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Welcome to the Office of Compliance & Ethics

QUESTION OR CONCERN?



About Compliance and Ethics

The Office of Compliance and Ethics works in close cooperation with the various academic and administrative offices throughout the SOM and the various support units of SIU Medicine to develop, disseminate and enforce policies, procedures, and guidelines related to a broad range of compliance and regulatory issues.

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SIU SCHOOL *of* MEDICINE

Compliance Hotline Frequently Asked Questions

Source:

siumed.edu/compliance/frequently-asked-questions-about-compliance-hotline.html

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Frequently Asked Questions About the Compliance Hotline

What is the SOM Compliance Hotline?

The ***SOM Compliance Line is an external, toll-free, 24-hour / 7 day-a-week telephone resource*** that allows you to report workplace concerns, including suspected illegal or unethical behavior; non-compliance with laws, regulations and policies; fraud, waste or abuse; patient information privacy issues; criminal offenses; or other concerns. Callers may remain anonymous if they so choose.

Every member of the SIU School of Medicine has a duty and responsibility to report any known or suspected non-compliant behavior or violations with any regulatory mandates and/or local policies. The Compliance Hotline, (800) 910-6707, is designed to give you an avenue for reporting concerns and violations to SOM's management in a confidential manner, without fear of retaliation.

What types of concerns may I report to the SOM Compliance Hotline?

You can report a wide variety of issues, including but not limited to:

- **Conflicts of Interest**
- **Embezzlement or Fraud**
- **Kickbacks**
- **Ethical Standards Violations**
- **Medical Billing Irregularities**
 - **Billing for services not rendered or items not provided**
 - **Falsifying claim forms to receive overpayment for services provided**
 - **Falsifying certificates of medical necessity and billing documents for services not medically necessary**
 - **Inaccurate billing practices that could result in the SOM receiving reimbursement for which it is not entitled**
 - **Any event that would require the SOM to disclose wrongful activity to a governmental agency, including unallowable costs in any claims for reimbursement**
- **HIPAA**
- **Patient Care**

- **Patient Privacy Rights / Other Patient Rights**
- **Policy Violations**
- **Substance Abuse/Alcohol**
- **Risk and Safety**
- **Research-related Issues**

Report the matter to your supervisor, department chair or administrator, Office of Compliance and Ethics, SIU HC Administrative Office, or someone of authority that you feel comfortable speaking with regarding the matter. If you prefer to remain anonymous, you can call the ***SIU Compliance Line, an external, toll-free, 24-hour / 7 day-a-week telephone resource.***

How does the School of Medicine's Compliance Hotline work?

When you call, an external, 3rd-party representative will gather specific information from you related to the reported activity. You may be asked additional questions. If you wish to remain anonymous, the call representative will respect your wishes to the greatest degree possible. You may call back at any time to receive a status on your report.

If I make a report, can any adverse action be taken against me?

SOM staff members, including supervisors, managers or employees, are prohibited by federal and state statute as well as operating policies at both the SIU system level and SOM from engaging in retaliation or any form of harassment directed against an employee who reports any concern. Any staff member who engages in retaliation or harassment is subject to discipline, up to and including discharge. However, adverse action may be taken against reporters when investigation reveals reports were not made in good faith (i.e., someone reported a concern with no factual basis with the intent to embarrass or otherwise defame an employee or unit).

Can I be assured that my call(s) will remain anonymous and confidential?

Yes, if you choose to report anonymously, your call will remain anonymous and confidential.



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Compliance Incident Report

Source:

siumed.edu/sites/default/files/u1891/incident_form_5-2-17.pdf

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COMPLIANCE INCIDENT REPORT CONFIDENTIAL

Section I: Contact Information

You may make this report anonymously by leaving this section blank. Please ensure you give enough detail below that the Office of Compliance and Ethics can investigate the issue being reported.

<input type="text"/>	<input type="text"/>	<input type="text"/>
First Name	Last Name	Department
<input type="text"/>	<input type="text"/>	<input type="text"/>
Job Title	Office Phone Number	Today's Date

Section II: Description of Alleged Violation

Description of alleged violation (provide copies of any supporting documents that help explain the situation):

Date this Occurred:	<input type="text"/>	To	<input type="text"/>	Persons Involved:	<input type="text"/>
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How did you come to learn of the incident/practice described above?

Are you willing to discuss the above allegations with the SOM Chief Compliance Officer?	<input type="checkbox"/>	Have you discussed allegations with anyone else?	<input type="checkbox"/>	If so, who?	<input type="text"/>
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Describe any further information you have to provide or any suggestions for verifying the allegations described above.

List any individuals you are aware of that may be able to provide further information.

Section III: Submit the Form

Submit the completed form and any attachments to:

By Mail:	By Campus Mail:	By Fax:	By Email:
Office of Compliance & Ethics 201 E. Madison Street PO Box 19683 Springfield, IL 62794-9683	Office of Compliance & Ethics MC9683	(217) 545-4410	Compliance_Hotline_Reporting@siumed.edu



SIU SCHOOL *of* MEDICINE

Fraud and Abuse Compliance and Reporting

Source:

siumed.edu/compliance/policies/fraud-and-abuse-compliance-and-reporting-policy.html

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**SIU School of Medicine
SIU HealthCare
POLICY**

FRAUD AND ABUSE COMPLIANCE AND REPORTING

Policy

It is the policy of SIU to consistently and fully comply with all laws and regulations pertaining to delivery of and billing for services which apply to SIU on account of their participation in Medicare, Medicaid and other government programs. SIU collectively applies to the SIU School of Medicine (SIU SOM), (including the Federally Qualified Health Center (FQHC)), and the SIU HealthCare (SIUHC).

I. Background

SIU has developed a fraud and abuse compliance program that is a comprehensive statement of the responsibilities and obligations of all employees of SIU and regarding submissions for reimbursement to Medicare, Medicaid, and other government payers. In addition, this policy is intended to apply to business arrangements with physicians, vendors, hospitals and other persons which may be impacted by federal or state laws relating to fraud and abuse.

II. Policy

A. Compliance Standards/Manuals

Compliance standards and manuals specific to affected areas of SIU SOM and SIU HC shall be developed and kept current with applicable laws and regulations.

The compliance standards for each clinical department and other SOM departments that manage delivery of and/or billing services shall contain a statement of compliance and shall define and assign responsibility for the timely and comprehensive updating of both the compliance standards and the compliance manual, necessary training and education, record keeping, and the completion of audits as designated by the Compliance Officer¹.

The compliance manual shall be a resource for the employees of each department designed to enhance the ability of employees to perform their responsibilities in compliance with the SIU SOM compliance policy and applicable laws and regulations. The CEO of SIU HC and the Department Chair, the Clinical Administrator, and/or the Manager in each affected department is responsible for ensuring that the compliance standards and manuals as required by this program and as designated by the Compliance Officer are developed and maintained in accordance with this policy.

It is the responsibility of every employee in the organization to abide by applicable laws and regulations and support SIU SOM's and SIU HC's compliance efforts.

B. Confidential Disclosure System

All employees are required to report their good faith belief of any violation of the compliance program or applicable law. The Compliance Officer or designee at the request of the employee(s), will provide such anonymity as practical to the employee(s) who report. Under certain circumstances, however, in the judgment of the Compliance Officer it may be

¹Compliance Officer also refers to the Compliance Officer's designee

necessary for disclosure consistent with the Compliance Officer's obligations to investigate employee concerns and take necessary corrective action. SIU SOM and SIU HC shall not retaliate against an employee as a result of such reporting. Compliance questions or matters can be reported using any of the following:

a. Oral Reports

Employees may report their good faith belief or violations of the compliance program or applicable laws orally by calling a dedicated hotline telephone number established for this purpose.

- Call the help and reporting hotline number (217) 545-7479 (forwards to Chief Compliance Officer's voicemail after hours).
- The Office of Compliance & Ethics will answer the phone or you will be connected to an automated voicemail messaging system. Callers will be interviewed regarding the incident or situation that prompted the call.
- Leave your name, contact information, and applicable message with as many details regarding the matter as you can provide. You may at your option make the call anonymously. Callers will have confidence that the information provided will not be used against them. The caller will not be required to identify himself or herself, and reports will contain no gender-specific or other identifying information regarding the caller.
- Only the Office of Compliance & Ethics will receive these messages through password protected access to the voicemail messaging system.
- Calls are treated confidentially.

b. Written Reports

Employees may report suspected improper conduct, illegal actions, good faith belief of violations of the compliance program or applicable laws by completing the Compliance Incident Report Form or through a secure email system noted below.

- Compliance Incident Report available for download in PDF format: [Compliance Incident Report Form](#)
- SIU e-mail: Compliance_Hotline_Reporting@siumed.edu
- SIU Ethics email: ethics@siumed.edu
- Send information by mail to:
Office of Compliance & Ethics
201 E. Madison Street – Room 342
PO Box 19683
Springfield, IL 62794-9683
- Written complaints or reports to the Compliance email or Compliance Incident report will be handled in the same confidential manner as oral reports.

c. Other Access

Other means of access to the Office of Compliance & Ethics are available that may or may not protect the identity of the person making the report. These means may be used at the discretion of the reporting party and include the following:

- Walk-in or scheduled appointment.
- Written complaints or reports marked "Confidential" may be delivered to:

Office of Compliance & Ethics (either by delivery, campus mail or postal service).
 201 E. Madison Street – Room 342
 PO Box 19683
 Springfield, IL 62794-9683

- Phone or electronic mail.

C. RESPONSIBLE OFFICER

SIU SOM has designated the Compliance Officer as the individual responsible for providing the overall direction and supervision of the compliance program. The implementation of the compliance program will be the responsibility of the Dean and Provost of the SOM/CEO of SIU HC who reports issues of noncompliance to the Compliance Officer. The Dean and CEO of SIU HC in coordination with the Compliance Officer shall be responsible to ensure that:

- Standards and manuals are reviewed and updated as necessary;
- Employee and vendor screening mechanisms are in place and are operating properly;
- Employees are receiving adequate education and training and that such education and training is documented;
- Audit procedures are implemented in accordance with the SIU SOM audit policies;
- Employee complaints and other concerns regarding compliance are promptly investigated; and
- Adequate steps are taken to correct any identified problems and prevent the reoccurrence of such problems.

D. REPORT TO THE BOARD

The Compliance Officer shall report in writing annually to the Board of Trustees of Southern Illinois University, the Board of Directors of SIU HC, and the Dean and Provost of SOM on the status of compliance within SIU SOM and SIU HC.

<p>Adopted: January 20, 1999</p>	<p>Contact: Compliance Officer</p>
<p><u>Revision:</u> Approved by OCP: 1/11/2017 Approved by Quality and Safety: 2/21/2017</p>	<p><u>References:</u></p> <ul style="list-style-type: none"> • Department of Health and Human Services, Office of Inspector General OIG Compliance Program for Individual and Small Group Physician Practices (65 CFR 194) • Patient Protection and Affordable Care Act of 2010 , Section 6401 of the Affordable Care Act provides that a “provider of medical or other items or services or supplier within a particular industry sector or category” shall establish a compliance program as a Condition of enrollment in Medicare, Medicaid, or the Children’s Health Insurance Program (CHIP)

¹Compliance Officer also refers to the Compliance Officer’s designee



Office of Compliance and Ethics Intranet

Home Help / Hotline Conflict of Interest Ethics Clinical Compliance HIPAA



SIU School of Medicine Campus Administrator for Ethics

Email Print

The School of Medicine's Chief Compliance Officer serves as the Ethics Administrator for the School of Medicine. As the School of Medicine's Ethics Administrator this position is the primary contact for ethics-related questions specific to the School of Medicine, including but not limited to gift ban, prohibited political activities, annual Statements of Economic Interests, and ethics training requirements for all employees.

Candice Long, CPA, CIA, CHC
Chief Compliance Officer/SOM Ethics Administrator
SIU School of Medicine
201 E. Madison, P.O. 19683
Springfield, IL. 62794-9683
Phone: (217) 545-8532
clong@siumed.edu

Hotline: 217-545-7479

Email: ethics@siumed.edu

Mail: University Compliance and Ethics Office
201 E. Madison, PO Box 9683
Springfield, IL 62794-9683

In Person: SIU HealthCare Administration, Room 342
201 East Madison
Springfield, IL 62794

Ethics Training

All employees are required by State Officials and Employees Ethics Act to complete ethics training. Different levels of training are required for permanent and temporary employees.

- **2016**

2016 Ethics Public University Employee Training Program [PDF](#)

This document is only for employees *not registered* for on-line training by Human Resources.

- **2015**

2015 Ethics Training Notice

Annual on-line ethics training is mandatory for all permanent SIU-SOM faculty, staff, student employees and graduate assistants. The 2015 on-line ethics training period for SIUC (and SIU School of Medicine) is October 15, 2015 through November 6, 2015.

Training Website: www.workplaceanswers.com/uillinois (do not log in until October 15)

Southern Illinois University Compliance and Ethics Office

Southern Illinois University has an established system-wide Ethics Office which serves to provide leadership on ethics related matters and ethical behavior in the workplace on the Carbondale, Edwardsville, Springfield, Alton, and East St. Louis campuses as well as the many outreach programs. The goal of the office is to advance and protect the University's mission and to foster an ethical working and learning environment for all. The SIU Ethics Office and Ethics Officer are located on the Carbondale campus and the web site link for this office can be found at: www.ethics.siu.edu

[SIU Ethics Officer Contact Information](#)

Michelle Taylor, Ethics Officer

Hotline: 844-597-6463

- Hotline Details
- Hotline Flyer

Email: ethics1@siu.edu

Mail: University Compliance and Ethics Office
1202 Douglas Dr. East, MC 6810
Carbondale, IL 62901

In Person: Thalman Hall, Room 203

Fax: 618-536-3456

Additional ethics contact information can be found on the [University Ethics Office website](#).



SIU SCHOOL *of* MEDICINE

Ethics Travel Form

Source:

siumed.edu/sites/default/files/u174/2016_ethics_travel_form.pdf

Downloaded: 6/17/19

Request for Approval of Educational Materials and Missions and/or Business Travel Exceptions to the Gift Ban and Executive Order 15-9

Agencies and employees subject to Executive Order 15-09 may not claim Gift Ban exceptions #4 (Educational Materials and Missions) or #5 (Travel Expenses to Discuss State Business) unless the exceptions comply with the provisions of 2 Ill. Admin. Code 1620.700 and the trip is approved in advance by the Executive Director of the Executive Ethics Commission or its delegate. The Executive Ethics Commission has delegated this authority to the SIU Ethics Officer.

Department Seeking Waiver:

Industry Sponsor/Prohibited Source:

Employee (s) Traveling:

Dates of Travel: Travel Started Travel Ended

Destination of travel:

Travel-related expenses to be paid by Sponsor/Prohibited source:

Approximate value of sponsored travel:

Additional information to explain why travel should be granted:

(Attach additional pages if necessary)

I confirm that the request identified above:

- 1) has a close connection to my State employment or the mission of the University;
- 2) predominately benefits the public and not myself;
- 3) is for travel in a style and manner in character with the conduct of University business; and

I further confirm that the Sponsor or Prohibited source has made or arranged payment or reimbursement of such costs:

- a) directly to the vendor hotel, airline, car rental, etc.;
- b) directly to the University for employee reimbursement; or
- c) directly to the employee after expenses have been incurred, but only if I have provided copies of receipts and documentation to my University Department or Unit.

Employee Signature _____ Date _____

Based upon the confirmation above, I approve this travel exception pursuant to Executive Order 15-9 as delegated to me by the Executive Ethics Commission.

Ethics Officer Signature _____ Date _____

The completed form should be emailed to ethics@siumed.edu or mailed to the address below for review and approval prior to the acceptance of any gifts or reimbursements: **SIU School of Medicine Ethics Administrator, 201 East Madison, Room 342, P.O. Box 19683, Springfield, IL 62794-9683.**



SIU SCHOOL *of* MEDICINE

Fraud and Abuse Compliance and Reporting

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SIU School of Medicine SIU HealthCare POLICY

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