



Promoting a culture of integrity and ethical behavior

What is the Corporate Compliance Program?

It is a formal, established program that supports Cleveland Clinic's commitment to following policies and standards of conduct to ensure we are in compliance with applicable federal, state and local laws and regulations. Under the direction of Donald A. Sinko, Chief Integrity Officer, the Office of Corporate Compliance:

- Identifies federal, state and local requirements that affect Cleveland Clinic operations
- Develops policies and standards of conduct
- Establishes procedures to prevent, detect and correct non-compliance
- Serves as a resource to resolve compliance issues

How do I recognize compliance issues in the workplace?

Here are some common examples of compliance issues/behaviors that all employees should know:

- Never read another employee's medical records without permission
- Never use another person's password to access confidential information
- Only discuss a patient's condition with those involved in the patient's care
- Only bill for tests performed
- Always provide complete medical documentation for services performed

Why is compliance important to me?

Compliance affects everyone. As a Cleveland Clinic employee, you are expected to:

- Carry out your job duties with integrity and honesty
- Learn and understand what laws and regulations apply to your position and to comply with those requirements
- Exercise good judgment and do the right thing when performing your job duties
- Report suspected compliance violations or errors to the Office of Corporate Compliance or the Office of General Counsel

How do I report concerns?

If you are aware of a suspected violation of any policy, regulation or law, bring it to the attention of your supervisor or department administrator. If you do not feel comfortable contacting your departmental representatives, please contact your hospital's Office of Compliance, or call the confidential reporting line. You do not have to identify yourself when you call any of the confidential reporting lines. When you call one of these lines, you will be asked to leave a voice-mail message that provides enough information to initiate an investigation. Specific names, dates, times, locations, and issue-specific facts will allow for a full investigation of issues. All reports will be investigated. Cleveland Clinic is committed to maintaining the confidentiality of callers to the reporting line. Maintaining confidentiality is consistent with Cleveland Clinic's policy of completing a thorough investigation of reports, which is required by law.

How do I learn more about the Corporate Compliance Program?

Please visit the Office of Corporate Compliance Web site, <http://intranet.ccf.org/corporatecompliance>, which includes links to regional Compliance Offices. Go to: <http://intranet.ccf.org/corporatecompliance>. Topic-specific education is available on COMET and is offered throughout the year. Check with your administrator or manager. Additional information is also available through the Department of Health and Human Services (DHHS), Centers for Medicare and Medicaid Services (CMS) and other regulatory agencies. Cleveland Clinic supports issue reporting and employee involvement through non-retaliation policies. No one who makes a call to the reporting line in good faith will be subjected to reprisal, discipline or discrimination based on having made a report.

The Office of Corporate Compliance and the Office of General Counsel encourage employees and others to raise issues of serious concern internally prior to seeking resolution outside Cleveland Clinic. An employee who feels the issue has not been addressed by the Cleveland Clinic issue resolution process may file concerns with governmental agencies under the False Claims Act. This act allows citizens with evidence of fraud by the institution to sue that institution on behalf of the government. A percentage of the recovery of funds from wrongful actions may be granted. The False Claims Act prohibits retaliation against an employee if: 1) an employee filed a claim against the institution, 2) the employer knew that the employee filed the claim, and 3) the employer's actions were a result of the employee's filing of the claim.

Corporate Compliance Resources

Office of Corporate Compliance..... 216.444.1709
Office of General Counsel 216.297.7000

To Report Compliance Concerns Confidentially

All Areas 1.800.826.9294
Cleveland Clinic Main Campus..... 216.444.4722
Euclid, Hillcrest, Huron, and 216.430.8006
South Pointe Hospitals
Fairview, Lakewood and Lutheran 216.521.2947
Hospitals
Marymount Hospital..... 216.518.1744
Florida 1.800.826.9294
Cleveland Clinic's Children's Hospital 216.721.7160
for Rehabilitation

Cleveland Clinic's Home Care Services 216.636.8739
Family Health Centers and 216.444.4722
Ambulatory Surgery Centers:
Beachwood, Brunswick, Chagrin Falls, Creston, Elyria,
Independence, Lakewood, Lorain, Solon, Strongsville,
Westlake, Willoughby Hills, and Wooster

Affiliated Facilities

Ashtabula County Medical Center, Glenbeigh
Hospital and Outpatients Centers, and Ashtabula
Regional Home Health in Ohio..... 440.997.6502