



Contractor Education



Welcome

Welcome to McLaren Health Care!

- This presentation will provide you with an overview of your roles and responsibilities as an independent contractor (i.e., service provider, vendor or company) within the McLaren Health Care system and provides guidelines to help direct your actions and decisions while performing work on behalf of McLaren.
- It is intended to provide general information and is not intended to create any contractual rights or obligations.
- If you have questions regarding this education, please contact McLaren.

➤ McLaren Mission Statement

Mission Statement:

McLaren Health Care, through its subsidiaries, will be the best value in healthcare as defined by quality outcomes and cost.

➤ Objectives

After reviewing this presentation, the reader will be able to understand:

- Safety guidelines applicable to the role of the contractor;
- Emergency codes and appropriate actions required;
- Requirements for maintaining and protecting patient confidentiality and electronic security;
- HIPAA (Health Insurance Portability and Accountability Act) rights and breach notification requirements;
- MHC policies relating to mobile devices;
- The purpose of the McLaren Safety First reporting system;
- Patient rights and your role in upholding those rights;
- The importance of preventing fraud, waste and abuse;
- Other laws impacting health care;
- The importance of avoiding and reporting conflicts of interest; and
- Your duty to report known or suspected compliance violations.

➤ Environmental Health and Safety

It is essential that all McLaren contracted workforce members know and understand the safety laws, regulations and McLaren policies pertaining to their roles.

- Contracted workforce members are required to:
 - Wear safety equipment when using machines
 - Wear personal protective equipment as required
 - Adhere to proper handling of hazardous waste and alert leadership of improper handling or disposal of waste
 - Know your respective role for emergency preparedness
 - Adhere to standard precautions, environmental controls and sterile environments to reduce the risk of disease transmission.
 - Follow manufacturers' equipment handling procedures
 - Maintain refrigeration at required temperatures



➤ Emergency Preparedness

Know the emergency codes and appropriate actions to take at your facility!

- Understand what to do in the event of an emergency occurring within the facility, such as:
 - Fire
 - Bomb threat
 - Abduction
- Understand what to do in the event of an external disaster or weather-related emergency, such as a tornado warning, which may impact the facility.



➤ Confidentiality and Electronic Security



- Patients provide McLaren with sensitive protected health information (PHI) on a constant basis to allow us to care for them.
 - PHI refers to any information, whether oral or recorded in any form, that is created or received by a health care provider and relates to a past, present or future medical condition.
- HIPAA (Health Insurance Portability and Accountability Act) established the Privacy & Security Rules which provide guidance on using, sharing and storing PHI and electronic PHI.
- MHC’s contracted workforce members must abide by the “minimum necessary” standards outlined in the HIPAA laws. Release of PHI other than for treatment, payment or operations purposes requires patient authorization or a court order.

➤ Confidentiality and Electronic Security - Continued



Patient rights under HIPAA include the:

- Right to confidential communication of PHI
- Right to access or receive a copy of their medical record
- Right to receive a notice of the McLaren's uses and disclosures of PHI
- Right to request changes to their medical record
- Right to receive a list (accounting) of PHI disclosures made by McLaren during the prior six year period
- Right to request a restriction on how their PHI is used
- Right to pay in full, out of pocket for a service and request that their health insurer not be billed.

➤ Confidentiality and Electronic Security - Continued

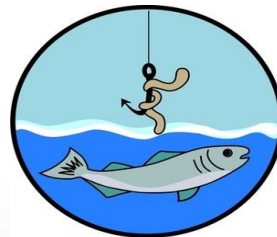


How to keep information secure

- Develop a complex password at least 8 characters long, with uppercase letters, lowercase letters, numeric digits and special characters i.e., Wizardofz1!
- Never share your password or post it on or around your workstation. Store it in a secure location such as a locked drawer.
- When you leave your workstation, log out of the application or system or lock it.
- Never copy PHI or McLaren business documents onto a personally owned device (phone, USB, etc.) without a supervisor's permission. All USB's must be encrypted.

➤ Confidentiality and Electronic Security - Continued

- Cameras or other video/audio recording devices are not permitted to be used on McLaren premises. This includes personal telephone cameras.
- When using e-mail to send PHI outside of the McLaren network, the e-mail must be encrypted as specified in the *McLaren Email Communications and Collaboration Policy (MHC_IS2020)*.
- Beware of “phishing” scams which require you to click on a link or enter data such as a bank account number. These links can launch computer viruses into the McLaren network. Notify the I.T. Service Desk if you notice any unusual e-mails.



➤ Confidentiality and Electronic Security - Continued

- Always use shred bins to dispose of PHI on paper, CD's, USB's and films.
- Each McLaren subsidiary has a designated HIPAA Privacy/Security Officer to oversee compliance with the HIPAA regulations. Suspected violations should be reported to the HIPAA Privacy/Security Officer, or to the MHC Compliance Hotline (1-866-MHC Comply)



➤ Mobile Devices and Removable Media

- Never text confidential or proprietary information, including PHI, on a mobile device.
- Never remove any records, files or work product from MHC's premises without supervisory approval.
- Supervisory approval is required in order to obtain access to McLaren e-mail from a mobile device.
- All removable media containing PHI, such as a USB drive or CD, must be stored in a locked cabinet and transported using a secure envelope or box.
- Contact the I.T. Service Desk immediately if you suspect that a mobile device with access to MHC data has been lost, stolen or compromised in any way.



➤ HIPAA Breach Notification Requirements



Reporting improper access, use or disclosure of patient information

- If you become aware that a patient's protected health information has been accessed, used or disclosed improperly, you are required to report this to the subsidiary HIPAA Privacy Officer.
- The Privacy Officer will conduct a risk assessment to determine whether the improper use constitutes a "breach".
- All breaches must be reported by the Privacy Officer to the patient and to the U.S. Department of Health and Human Services, and in some cases, to local media.

➤ Safety First Reporting System



SAFETY FIRST electronic incident reporting system is used to help capture, identify and address safety risks while promoting a culture of transparency and patient safety. Events can be reported anonymously.

Example of events and concerns that should be reported:

- Near Misses/Other Safety Concerns
- Equipment Issues or Failures
- Security/Safety Issues
- Medication dispensing errors
- Patient Identification and/or Consent Issues
- Patient falls when McLaren staff are present
- Employee/Staff Injuries
- Patient Feedback (Compliments, Complaints, Grievances)

Our Commitment to Providing Patient Care



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- McLaren Health Care strives to provide excellent results in every situation and expects its contracted workforce members to treat all patients and their families with care, respect and dignity.
- This commitment to excellence includes the physical, emotional, psychological and spiritual care of each person.
- Every patient shall have impartial access to treatment, and be free of coercion, discrimination or retaliation, regardless of race, religion, culture, language, socioeconomic status, sex, sexual orientation, gender identity or expression, ethnic background, height, weight, age or disability.
- If quality or safety concerns are not being met, it is your responsibility to raise the concern through appropriate channels.

➤ Our Commitment to Providing Patient Care - Continued



- All McLaren contracted workforce members are expected to create a proper atmosphere for patients and visitors through:
 - Attention to both facility and personal appearance
 - Individual professionalism – being responsible for your actions and taking pride in your work
 - Effective communication – using plain language, making eye contact, using proper phone etiquette, smiling and greeting patients and family members
 - Exceeding the expectations of patients, patient family members, and co-workers
- If a patient or family member expresses concern about the care received at McLaren, contracted workforce members are individually responsible to address the issue or refer it to the appropriate person in the organization.

➤ Patient Rights



- McLaren Health Care will ensure that patients have the right to make informed decisions for the proposed course or choices of treatment based on information about their medical conditions, presented in a manner that the patient can easily understand.
- Patients are entitled to refuse treatment to the extent provided by law and to be informed of the consequences of that refusal.
- Patients are entitled to receive information about designating another person to make decisions about their medical care (Advance Directives) in the event they are not capable to making their own decisions.
- McLaren providers will comply with a patient's Advance Directives within the guidelines of the law and medical ethics.

➤ Fraud, Waste and Abuse Laws

- The laws surrounding health care are numerous and complex. All MHC contracted workforce members must be familiar with laws applicable to their specific roles.
 - Federal and State False Claims Acts prohibit an entity or individual from submitting a false or fraudulent claim to Medicare or Medicaid for payment. Examples include:
 - Billing for services not provided
 - Billing for medically unnecessary services
 - Upcoding
 - Stark Laws prohibit a physician from making referrals for certain health services to an entity which the physician or his/her family member has a financial relationship with.
 - Anti-Kickback Statue prohibits the offering, paying, soliciting or receiving remuneration in order to induce or reward referrals of Medicare/Medicaid business.



➤ Whistleblowers and MHC's Non-Retaliation Policy

- Both federal and state laws protect individuals who investigate or report possible false claims made by their employer against discharge or employment discrimination based on such investigation.
- Whistleblowers who experience these types of retaliation may sue in court for damages.
- MHC's Non-Retaliation Policy protects individuals who report a suspected or known violation in good faith.



➤ Avoiding and Reporting Conflicts of Interest



- MHC contractors are expected to act in McLaren's best interest and conduct all activities on behalf of MHC in good faith, being careful to avoid the appearance of a conflict of interest.
- Contractors may not solicit or accept anything of more than de minimus value, including a loan, reward, material or property, from a patient, patient's family, visitor, contractor, supplier or competitor. Accepting cash or a cash equivalent is strictly forbidden. Small tokens of appreciation from a patient, such as candy or cookies are permitted.
- Contractors may not use any information received through MHC to obtain financial gain for themselves, their family, or their businesses.
- Contractors who have been excluded from participating in federal or state health care programs must immediately notify the local or MHC Compliance Officer.
- Any situation that may be considered a conflict of interest must be reported to the local or MHC Compliance Officer, or via the MHC anonymous hotline.

➤ Ensuring Accurate Coding, Billing and Collections

- All billing, coding and collections contractors must follow applicable laws, policies and procedures to ensure accurate, timely and complete coding, billing and collection activities to governmental payers, commercial insurances and patients, including:
 - Billing only for services that were reasonable and necessary
 - Billing for services at levels that are supported by medical record documentation
 - Bundling or unbundling charges appropriately
 - Attempting to collect outstanding balances from Medicare patients only when Advance Beneficiary Notices (ABN's) were provided prior to service when indicated
 - Preventing duplicate billing
 - Ensuring the accuracy of diagnostic and procedure codes

➤ Proper Employment Practices



- McLaren Health Care takes precautions to ensure the work environment is free of discrimination or harassment in compliance with federal and state laws.
- Contractors must treat all individuals fairly, regardless of race, age, sex, religion, national origin, culture, language, socioeconomic status, sexual orientation, gender identity or expression, ethnic background, height, weight, marital status or disability.
- Each person has the right to work in an atmosphere free from discriminatory practices and unlawful harassment.
- Anyone who believes he/she has been a subject of discrimination or harassment, or who has witnessed such conduct, should immediately report it to management.

➤ McLaren is Federal Contractor

McLaren is therefore required to comply with federal requirements which:

- Prohibit discrimination against qualified individuals based on their status as protected veterans or individuals with disabilities, and prohibit discrimination against all individuals based on their race, color, religion, sex, sexual orientation, gender identity, or national origin.

These regulations also require that covered prime contractors and subcontractors of McLaren take affirmative action to employ and advance in employment individuals without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, protected veteran status or disability.

➤ Safety and Security



McLaren Health Care is committed to the safety and security of all employees and visitors.

- Contracted workforce staff are responsible to:
 - Wear appropriately displayed name badges at all times
 - Sign into the appropriate vendor management system, such as PremierPro, as required
 - Report suspicious persons or situations immediately
 - Avoid intimidating and disruptive behaviors that may jeopardize patient care and other work. Examples include verbal outbursts and physical threats, using condescending language or tone, refusing to perform assigned tasks, etc.

➤ Compliance Reporting

- As a McLaren contractor, if you become aware of any situation that could lead you or others to engage in actions that could result, or have resulted in a compliance violation, you should notify the subsidiary Compliance Officer. (Consult the subsidiary telephone directory for the number.)
- You may also contact the MHC Compliance Officer at 1-866-MHC-COMPLY.
- Anything you report to the Compliance Officer is strictly confidential and will not result in retaliation of any kind.

