

# CORPORATE COMPLIANCE MATTERS

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*EVERCARE: SUCCESS THROUGH COMPLIANCE*

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## Q & A:

When may I email PHI and include the word “exempt” in the subject line of the email?

Never ever! Not allowed! You must never use “exempt” in the subject line of your EverCare email if it includes PHI. It becomes unprotected and can end up in the public domain.

See related article -->

## Q & A:

Why must I send faxes and stamp pages “confidential?”

The purpose is to help make sure we are using reasonable safeguards in accordance to the HIPAA Privacy Rule and protect one’s protected information.

## WHAT IS PROTECTED HEALTH INFORMATION?

Protected Health Information (PHI) refers to an individual’s demographic information such as name, date of birth, address, Social Security, medical history, insurance ID, medications and other data collected by healthcare providers, etc. to identify an individual and determine appropriate care.

**PHI IS EXTREMELY SENSITIVE INFORMATION AND** must be kept private and not disclosed except with proper authorization from the patient or their representative OR we can use PHI without authorization when it is for the **treatment of our members and patients and/or for payment and health care operations**. These include providing it when needed to our providers who are treating our members and patients. We use an encrypted e-mail system so when you send information to our providers it is encrypted and they must use a password to open the document containing PHI. It is critical that this encryption be used and staff are prohibited from going around the encryption software by using the term “EXEMPT”. If there are special circumstances and low risk (e.g., no PHI) you can seek permission from your supervisor or leadership to use “EXEMPT”. However, it should NEVER be used with PHI or any corporate proprietary information. It is best that you consult with your supervisor and/or leadership before using it. Your help and attention to this very important detail keeps our Compliance Program on target and to meet regulatory requirements. (Contributed by Ilana Charette)

**TODAY’S COMPLIANCE PROGRAM ELEMENT** is training and education. It is the 7th of 8 core compliance program elements. It is for all employees, department heads, management, board of trustees and vendors. The purpose is to educate and identify, through examples, the goals of reducing risk, errors and any unethical behavior so as to prevent sanctions, penalties and fines but also to make sure we are all doing the right thing.

**MEDICAID: AS A LAST RESORT** for people who need long term care service and support, is the subject of an AARP Public Policy Institute article: <http://www.aarp.org/content/dam/aarp/ppi/2017-01/Medicaid-A-Last-Resort-for-People-Needing-Long-Term-Services-and-Supports.pdf>

**DID YOU KNOW** your compliance office provides Notary Public services.

**COMPLIANCE CROSSWORD PUZZLE** – see attached. Complete the puzzle. See how you do and have some fun with it! Good luck. (Idea by Janet Gonzalez)

## TODAY’S TOP 5 ACRONYMS:

1. CPR: Cardiopulmonary Resuscitation
2. DSRIP: Delivery System Reform Incentive Payment
3. IBNR: Incurred but not yet received (estimated claims)
4. MLTSS: Managed Long Term Care Services & Support
5. RFP: Request for Proposal