



VHA Compliance Information Contractor Handout

What is Compliance and Business Integrity (CBI)?

The Compliance Program includes prevention, detection, and self-reporting of violations of law. Compliance is a process that ensures we are doing what we say we are doing. Compliance demonstrates that we are documenting, coding, and billing accurately for services provided, and only for services that are medically necessary.

Laws and Regulations: It is the responsibility of the Contractor to be familiar with all laws, regulations and VHA (Veterans Health Administration) Directives that are applicable to the VHA contract under which they are providing services and to adhere to them at all times. Where there are questions or uncertainty exists, the Contractor must seek guidance from the VHA Contracting Officer.

False Claims: A contractor is prohibited from knowingly and willfully defrauding or making improper claims to any entity.

Compliance Failure: This is any deviation from a standard, rule, policy regulation, or law that applies to VHA business-related matters, procedures, or practices.

Reporting Requirements: The Contractor is required to report any concerns related to compliance with applicable rules and regulations or potential fraud or abuse observed while performing duties under this contract. Reports will remain anonymous to the extent possible under applicable rules and regulations.

How do we report concerns or questions?

Ask yourself

- Is the action legal and ethical?
- Does it comply with law and regulations?
- Is it consistent with VHA policies, procedures and organizational values?
- Would you feel good about yourself if you did it?
- Would you be comfortable discussing this with your family, friends, patients and community?

IF the question is NO to any of the above – **Contact the Compliance Officer at the local VHA facility (List of VISN 23 VHA Compliance Officers, addresses, e-mail addresses and phone numbers is attached) or call the CBI HelpLine at 1-866-VHA-HELP (1-866-842-4357)**

HIPAA and Privacy Reminder

The following are reminders of how all of us can help ensure each patient's right to privacy:

- ❖ By avoiding using patients' names in public.
- ❖ By isolating or locking file cabinets or records rooms;
- ❖ By providing additional security, such as passwords, on computers maintaining personal information; and
- ❖ By making sure there are no patient records or documents containing patient information lying around in areas. All patient records should be covered or hidden from view of anyone not reviewing the record.

Important notice - Current VA policy explicitly **prohibits** sending confidential information regarding patients via e-mail, even at the patient's request. See *VHA Directive 2003-025: Confidential Communications*, May 23, 2003. Available at <http://vaww.va.gov/publ/direc/health/direct/12003025.pdf>. (Compliance to provide "external web site")

I acknowledge receipt of the letter and handout regarding the VHA Medical Center's Compliance Program. I certify that all current and new employees, involved with this contract, have/will complete our internal compliance training.

Signature

Date