

THE COMPLIANCE COMPASS

THE COMPLIANCE NEWSLETTER FOR EMPLOYEES OF PGBA, LLC

Volume 1, Issue 19

June, 2009

Compliance Hotline (888)263-2077

Questions?

Ask us! We're here to help!

Kathy Norton	x 36422 AG-A25
Lindsey Bible Columbia/Camden	x 36112 AG-375
Glenda Carter Surfside	x 17360 MB-128
Terri Warren Florence	x 68431 FC-DCC

Summer Ethics Refresher

As it heats up outside, our thoughts may turn to fun in the sun, taking a vacation, or various other summertime activities. It is easy to become distracted while at work. However, we must keep Our Values in mind, specifically, Integrity. Our company's commitment to integrity as expressed in Our Values is:

"Integrity: We will meet all our responsibilities in an honest and ethical manner. We will follow all laws, rules and regulations."

Most of us read that and don't think too much about it right away. We say to ourselves, "I'm an honest

person, I don't tell lies." But there is more to this value than you may realize at first. Integrity, in the spirit of Our Values, is about making the commitment to not only be honest, but to meet the daily responsibilities of our jobs in an honest AND ethical manner. This means that each decision we make during the course of the day should be based on what is right, and also ethical. Just because something may not be expressly forbidden in policy, doesn't mean it is ok. We must all remain aware of how the decisions we make affect not only ourselves, but others as well.

Some examples of the daily decisions we make that require a measure of

ethics are:

- Logging work start and stop times.
- When dealing with our co-workers and management.
- Deciding to report a known or suspected compliance violation.
- Not allowing anyone to piggy-back into the building behind you.
- What to do when we think we have more work than we can handle.

Please continue helping us meet our commitment to Integrity by making the best, and most ethical decisions. If you should encounter a situation you feel requires ethical guidance, feel free to contact your local PGBA Compliance Manager.

"Relativity applies to physics, not ethics."

- Albert Einstein

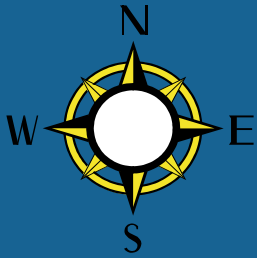
Compliance Survey and Certification

It may still be summer, but it's never too early for a reminder regarding the **annual Compliance Awareness Survey** and the **annual Certification of Compliance Statement**. Both of these important initiatives are administered via the LMS in the fall. To help

you keep them straight, here is some basic information about each. The survey asks for your feedback regarding how your management communicates about compliance. Keep in mind that **all survey responses are confidential**.

The Certification of Compliance Statement asks you to certify that you have reported any potential, known, or suspected compliance violations to the appropriate persons. Both of these initiatives are rolled out in the fall via the LMS.

More information regarding roll-out dates and due dates will be supplied later. Please contact your local PGBA Compliance Manager with any questions.



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Volume 1, Issue 23
December, 2010

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Don't Take a Holiday From Compliance

With all the hustle and bustle of the holiday season, it is all too easy to become distracted. PGBA Compliance would like to remind you all to make a little extra effort to remain vigilant for possible fraud and/or abuse. Also, please make an extra effort to ensure work is completed correctly and thoroughly. Typos on claims and correspondence can create incidental disclosures that must be reported to the government. Miskeying one digit of a claim number into an

ALGS letter can result in a provider receiving PII and/or PHI belonging to a beneficiary who is not their patient. Processing a claim with an incorrect provider number can result in a disclosure of PII and PHI when the remittance is sent to the wrong provider. Mistakes like these are easy enough to make when there aren't extra distractions, so please be extra diligent this holiday season when completing your work. Be mindful of not only the HIPAA regulation, but how you would feel

if your information were sent to a provider or other customer with whom you had no relationship. By keeping these things in mind and using additional caution each day, we can do our small part towards ensuring our customers have a stress-free holiday. Well, at least no stress caused by incidental disclosures, anyway. Now, if we could just find a way to make holiday shopping stress-free!

Warm Wishes from PGBA Compliance

The PGBA Compliance Team would like to extend a very special thank you to all of you for embracing and honoring the culture of compliance our company has become known for. While we all work as one team, we in the compliance department can't help but feel proud of our respective locations: Glenda Carter believes there isn't anything her Surfside crew can't accomplish and is proud to work with them every day. Terri Warren's roots run deep in Florence, and she is committed to supporting them in every way possible. Lindsey Bible is lucky to have both Columbia and Camden and loves being able to support them both. Last but certainly not least, Kathy Norton gets to claim us all, each and every one. She is thrilled to help any location every chance she gets. On behalf of all of us in PGBA Compliance, please have a safe, happy, and joyous holiday! And don't forget to be compliant.

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"Upon the conduct of each depends the fate of all."

- Alexander the Great

We've been, good.
We promise.





Happy Holidays from Seymour, the PGBA Compliance Seal!

December, 2010

Seymour's getting ready for a hectic holiday season! He's making his list and checking it twice to make sure we all remember these important tips during the craziness of the holidays:

- **Be mindful of safeguarding our customers' personal information.**
- **Remember the non-solicitation policy.**
- **Stay alert for any signs of possible fraud or abuse.**
- **Maintain the exceptional level of customer service our company is known for!**
- **Contact your manager first, if you can, when possible issues arise.**

**Have a safe and wonderful holiday!
And of course, call these guys if you have any questions!**

Your PGBA Compliance Team

Kathy Norton, AVP, PGBA Compliance Officer
Lindsey Bible, PGBA Compliance Manager—Columbia, Camden
Glenda Carter, PGBA Compliance Manager—Surfside
Terri Warren, PGBA Compliance Manager—Florence

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It's May! Seymour has spring fever!

May 2011

Team D in the South Region wanted to place a visual emphasis on Compliance as a daily reminder of their commitment to the Compliance Program. To do this, they used the bulletin boards along the walls of the middle aisle of the building and updated them with Compliance themes.

Other teams throughout Florence have also gotten into the act and created boards that have Compliance themes. Check them out and enjoy!

If your team has done something unique and fun to promote compliance, please let us know!



You can contact these guys if you have any questions:

Your PGBA/InStil Health Compliance Team

Kathy Norton, AVP, PGBA/InStil Health Compliance Officer x36422
Lindsey Bible, PGBA/InStil Health Compliance Manager—Columbia, Camden x36112
Glenda Carter, PGBA/InStil Health Compliance Manager—Surfside x17360
Terri Warren, PGBA/InStil Health Compliance Manager—Florence x68431

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PGBA QUEST CHALLENGE

THE FUN GAME THAT EXPLORES YOUR COMPLIANCE KNOWLEDGE

PGBA Quest Challenge responses are used only for tracking divisional training needs and are not used to identify individual associates' performances.

- Quest Home
- This Week's Challenge
- Previous Challenges
- Previous Quest Challenge Winners



You are here: [iZON Home](#) > [PGBA Quest Challenge Home](#) > [Previous Challenges](#) > **ID, Please!**

ID, Please!

Question While arriving for work one day, as you approach the entrance to the building, you notice a man standing near the doorway. You have seen him around the office and know him to be an employee. When you swipe your badge and open the door, the employee begins to walk in behind you. You notice he does not swipe an ID badge before entering the building. What should you do?

- Responses**
- A. Scream at the top of your lungs until he leaves.
 - B. Tell him he needs to swipe his ID badge, if he refuses report the incident to security immediately.
 - C. Allow the employee to enter, and immediately report the incident to your manager.
 - D. "Piggy Backing" makes you crave BBQ, so you invite him to lunch.

Answer B. Tell him he needs to swipe his ID badge, if he refuses report the incident to security immediately.

Comment Corporate policy prohibits employees from entering the building without swiping his/her ID badge. Policy # 65287 - Corporate Access Control, 2.1 "Each employee must use his or her personal badge to enter a facility or restricted area. No employee or visitor may enter or leave a facility by following another employee or getting another employee to open the door. Each must present his or her badge to the access control card reader (or security officer/receptionist). It is a violation of this policy for an employee to use another employee's badge."

In the News

HIPAA, Privacy and Fraud Violations

The following information is from press releases from the Office of the Inspector General, the Department of Justice and the Department of Health and Human Services.

February 25, 2011—The US Justice Department announced that BlueCross BlueShield of Illinois, a division of Health Care Service Corporation, had agreed to pay the United States and the state of Illinois \$25 million to settle False Claims Act allegations. The settlement resolves claims by the United States that BlueCross BlueShield of Illinois wrongly terminated insurance coverage for private duty skilled nursing care for medically fragile, technologically dependent children, in order to shift the costs of such care to the Medicaid program. Medicaid funds a special program designed to provide home care for children at risk of institutionalization.

http://oig.hhs.gov/o8/USDOJ_News_Release_02242011.pdf

February 22, 2011—The U.S. Department of Health and Human Services' (HHS) Office for Civil Rights (OCR) has issued a Notice of Final Determination finding that Cignet Health of Prince George's County, Md., (Cignet) violated the Privacy Rule of the Health Insurance Portability and Accountability Act of 1996 (HIPAA). HHS has imposed a civil money penalty (CMP) of \$4.3 million for the violations, representing the first CMP issued by the Department for a covered entity's violations of the HIPAA Privacy Rule. In a Notice of Proposed Determination issued Oct. 20, 2010, OCR found that Cignet violated 41 patients' rights by denying them access to their medical records when requested between September 2008 and October 2009. These patients individually filed complaints with OCR, initiating investigations of each complaint. The HIPAA Privacy Rule requires that a covered entity provide a patient with a copy of their medical records within 30 (and no later than 60) days of the patient's request. The CMP for these violations is \$1.3 million.

<http://www.hhs.gov/news/press/2011pres/02/20110222a.html>

February 17, 2011—The Medicare Fraud Strike Force today charged 111 defendants in nine cities, including doctors, nurses, health care company owners and executives, and others, for their alleged participation in Medicare fraud schemes involving more than \$225 million in false billing, announced Attorney General Eric Holder, Health and Human Services (HHS) Secretary Kathleen Sebelius, FBI Executive Assistant Director Shawn Henry, Assistant Attorney General Lanny A. Breuer of the Criminal Division and HHS Inspector General Daniel Levinson. Also today, the Department of Justice (DOJ) and HHS announced the expansion of Medicare Fraud Strike Force operations to two additional cities – Dallas and Chicago. Today's operation is the largest-ever federal health care fraud takedown.

<http://www.justice.gov/opa/pr/2011/February/11-ag-202.html>

The U.S. Department of Health and Human Services, Office of Inspector General also has a list of the top 10 most-wanted health care fugitives. These 10 individuals have allegedly defrauded taxpayers of more than \$124 millions. See <http://oig.hhs.gov/fugitives/>

If you have any questions, please feel free to contact any member of your PGBA/InStil Health Compliance Team

Kathy Norton, AVP, PGBA/InStil Health Compliance Officer , x36422

Lindsey Bible, PGBA/InStil Health Compliance Manager—Columbia, Camden, x36112

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Terri Warren, PGBA/InStil Health Compliance Manager—Florence, x68431



COMPLIANCE 2.0!

(Education and awareness initiatives management can undertake at PGBA)

Compliance Awareness Survey result are in! Questions on the survey:

1. The company's compliance program is actively supported by my immediate management.
2. Compliance-related topics such as the quiz question, the Compliance newsletter, compliance with policies and/or procedures, government requirements, and/or the Privacy Act/HIPAA are discussed by my immediate management.
3. The different methods to report a compliance concern are discussed with my team and/or others by my immediate management.
4. My immediate management makes it clear that compliance issues are to be raised and addressed without fear of retaliation.
5. I feel comfortable discussing any compliance problems that might come up with my immediate management.
6. If I become aware of a compliance concern, I will report it.
7. I am comfortable in going to the Compliance Department with compliance issues.

What are some easy ways YOU can show support of the compliance program?

Compliance Common – a joint Government Programs Compliance newsletter aimed at making compliance a common ideal for government programs employees

- when the notice with newsletter comes out, print off a copy of the newsletter and take it to your staff meeting and discuss one of the issues in the Compliance Beat column
- pin the newsletter on your office wall for all to see.

Send proactive informational e-mails to your staff (your compliance officer can help draft it, but you get to send it)

- what type of gifts you can/cannot accept at holiday time
- part-time jobs and conflicts of interest with their jobs at PGBA
- confidentiality of our systems and facilities
- how and to whom to report compliance-related issues
- (see the Government Programs Compliance Handbook for more ideas)

Quest – do you guys have access to it? Do you take the quiz? Do you encourage your staff to take the quiz? You could print off the quiz question and discuss it at a team meeting.

Team meetings-invite your Compliance Officer.

And on IZON, the Compliance Team Builder Bank is available for your use to support Compliance awareness.

What's a Compliance Rebus?

Summary:

Two weeks before the scheduled team builder, participants will be organized into small teams and given the task of developing two Compliance pictograms (also defined as a "rebus"). During a team builder session the participants will have to guess the meaning of each pictogram. The team who correctly decodes the most pictograms will win. (approximately 30 minutes of participant preparation and 30 minutes of decoding).

Prior to the session:

- Send an e-mail to the team with pertinent information (see sample below):

Please reserve the following date and time for our next exciting Compliance Team Builder:

Monday, December XX
11:30 - 12:00
Training Room X

For this team builder you'll be working in assigned teams to create two pictograms depicting a compliance phrase or concept. Please save each pictogram on a separate PowerPoint slide (or on paper) and submit to me no later than Friday, December XX. Please do not share your pictograms with other teams, as we will be trying to decode them during the team builder session. I have attached two examples to give you an idea of what I'm envisioning - but I know you'll be even more creative!

Let us know if you have any questions.

Teams:

Selena and Horton
Melanie, Charlotte and Tony
Brenda, Denise and Beth
Melissa and Teresa C.
Kim and Gloria
Michelle and Pat
Teresa F. and Diane

Good luck and have fun!

- The facilitator will need to compile the pictograms so that they can be displayed during the team builder session, and develop a key with the correct answers.

Determine Awards/Prizes

- Based on your resources obtain prizes for the winning team or everyone. If you bring in a prize for everyone, be sure the winning team gets first pick.
- A variety of candy and snacks works well.

What's a Compliance Rebus?

Facilitate the session:

- As participants enter the room, have them sit with their assigned team members.
- Give each team a paper to record their answers.
- Display each pictogram for no more than two minutes and have the teams write down their answers.
- After the final pictogram is displayed ask each team to reveal their answers and then have the developers tell the correct answer. Each team will give themselves one point for each correct answer.
- The team with the most points wins.

What's a Compliance Rebus?



The correct answer is “NO PIGGYBACKING”