



Loudoun Medical Group, P.C.

Standards of Conduct &
Compliance Program

TABLE OF CONTENTS

CORPORATE COMPLIANCE PROGRAM INTRODUCTION

A Message from Loudoun Medical Group	3
--------------------------------------	---

STANDARDS OF CONDUCT

Quality of Care	4
-----------------	---

Compliance with Laws and Regulations	5
--------------------------------------	---

Health Insurance Portability and Accountability Act (HIPAA)	6
---	---

Billing and Coding	7
--------------------	---

Property, Equipment and Other Assets	8
--------------------------------------	---

Conflicts of Interest	9
-----------------------	---

Vendors and Contractors	10
-------------------------	----

Communication and Reporting Process	11
-------------------------------------	----

Responsibility of Employees and Management	12
--	----

CERTIFICATION AND ACKNOWLEDGEMENT	13
--	-----------

CORPORATE COMPLIANCE PLAN	14–17
----------------------------------	--------------

CORPORATE COMPLIANCE PROGRAM

INTRODUCTION

A Message from Loudoun Medical Group

Loudoun Medical Group (LMG) is committed to delivering quality patient care while conducting its business with integrity and in accordance with all applicable federal and state laws. LMG has developed this Standards of Conduct and Compliance Program to prevent the submission of erroneous claims or engage in unlawful conduct.

It is our goal, as a result of our compliance efforts, to prevent unlawful acts through education and training.

STANDARDS OF CONDUCT

Quality of Care: We are committed to providing high quality care and services. Our first priority is to the patients we serve.

- We have a responsibility at every level of organization to maintain integrity and quality in our job performance.
- We render services to patients without regard to their sex, age, disability, race, ethnicity, religion, national origin, sexual orientation, citizenship, or any other classification protected by law.
- We will employ appropriately licensed and properly credentialed health care providers possessing the required expertise and experience to care for our patients. Upon request, we inform patients or their authorized representative of the identity of all personnel who participate in their care.
- We maintain strict confidentiality regarding individually identifiable health information and prevent the unauthorized release of such information. Unless otherwise permitted by law, information contained in a medical record will not be released to anyone outside the organization without the individual's consent or authorization.
- We will make every effort to maintain complete, accurate and legible accounts of all care and treatment provided to patients.
- We will continually monitor and evaluate the delivery of care and related services to assure that appropriate quality of care standards are met.

STANDARDS OF CONDUCT

Compliance with Laws and Regulations: We are committed to ethical standards of business and professional ethics and integrity. We conduct our business activities and patient care operations in full compliance with all applicable federal, state, and local laws and regulations.

- We comply with all requirements of federal and state laws and regulations (i.e., The False Claims Act, Stark Law, Anti-Kickback Statute, Virginia Medicaid Fraud Control, etc.) and the role of such laws in preventing, detecting, reporting and correcting incidents of fraud, waste and abuse in government health care programs.
- We will not solicit, accept, give or offer anything of value for the referral of patients or services which may be paid by a federally funded healthcare program. Kickbacks, bribes, rebates, gifts or any kind of benefits intended to induce referrals or in return for referrals are strictly prohibited.
- We record all financial information in accordance with generally accepted accounting principles and established financial procedures and internal controls.
- We conduct our marketing efforts with truth, accuracy, fairness and responsibility to patients, the communities we serve, and the public at large. Marketing materials reflect only those services available, the level of licensure and accreditation, and comply with applicable laws and regulations dealing with truth in advertising, non-discrimination and confidentiality.
- We cooperate with all appropriate requests for information from government auditors, investigators or other officials. If an employee is contacted by an organization, the employee should contact their manager immediately.
- We will not employ, contract with or bill for services rendered by an individual or entity that is excluded or ineligible to participate in government health care programs. Employees have an affirmative duty to immediately report to their immediate supervisor, any potential adverse action taken by an authorized regulatory agency.

STANDARDS OF CONDUCT

Health Insurance Portability and Accountability Act (HIPAA): We are committed to protecting the privacy of our patients by preserving the confidentiality and security of individually identifiable patient health information, whether or not such information is maintained electronically, in writing, is spoken or in any other medium.

- We will use and disclose individually identifiable health information for purposes of treatment, payment or healthcare operations in accordance with federal and state law.
- We will provide written notices of our privacy practices (NPP), including descriptions of individual rights with respect to protected health information (such as the right to inspect, copy, amend, or correct their health records) and the anticipated uses and disclosures of this information that may be made without the patient's written authorization.
- We will only view a patient's personal health information on a need to know basis. Whenever using, disclosing, or requesting protected health information, we will use reasonable efforts to limit the amount of individually identifiable information we use, disclose, or request to the minimum necessary to accomplish the purpose for which the use, disclosure or request is made.
- We will ensure, to the best extent possible, that our business associates provide us with satisfactory assurance that they will safeguard and keep confidential, our patient's individually identifiable health information in the form of HIPAA compliant business associate agreements.
- By law, we treat designated patient information, such as mental health notes, substance abuse and HIV/AIDS, with the strictest of confidence and will not release or disclose such information without the patient's prior written consent or by valid court order or as otherwise permitted by law.

STANDARDS OF CONDUCT

Billing and Coding: We are committed to properly coding and billing for the services we render in accordance with all federal, state, and local laws and regulations.

- We bill only for those services and care, which are actually provided, medically necessary, appropriately authorized and properly documented. We will not knowingly submit an incorrect claim for payment or reimbursement.
- We will assign billing codes that most accurately reflect the services and care provided. Upcoding, unbundling or any other means of artificially enhancing reimbursement is unlawful and strictly prohibited.
- We will prepare and maintain all billing records accurately, reliably, honestly, and in accordance with both established billing policies and practices and that are consistent with all applicable federal, state and private payor health care program requirements.
- We will regularly review our records for patient credit balances and promptly refund any overpayments.
- We do not routinely waive insurance co-payments or deductibles.
- We will maintain all records in a secure location for the period of time required by law. The premature destruction or alteration of any document in response to, or in anticipation of, a request for those documents by any government agency or court is strictly prohibited.
- We will respond in a direct, timely and honest manner to all questions and complaints related to patients' billing.
- We will conduct internal and/or external audits to ensure compliance with coding and billing regulations.

STANDARDS OF CONDUCT

Property, Equipment and other Assets: We are committed to protecting Loudoun Medical Group's property, equipment and other assets against loss, theft, destruction or misuse.

- We are responsible and accountable to ensure, including the access and security of our systems and our practices, the proper business use of all Loudoun Medical Group assets, property, and equipment in general. All users of the computer system acknowledge the proper use each time the computer is accessed.
- We will follow established internal control procedures when handling and recording Loudoun Medical Group's assets, property and equipment. The responsibility for physical security of laptops and portable computing devices and information contained within resides with the individual to whom the device is allocated. Prior to leaving employment, individuals must return all Loudoun Medical Group owned property.
- We strictly prohibit making unauthorized copies of any computer software licensed to Loudoun Medical Group, including downloads or executables from the internet. Executable software must be validated, approved and installed by Information Services (IS). Unmanaged installations can compromise the operating environment and also constitute a security risk, including the intentional or unintentional spreading of software viruses and other malicious software.
- We protect confidential corporate information and not use or reveal information except in the proper performance of duties. We respect and protect the intellectual property rights of individuals and companies with which we do business. We do not make copies or use property without advance written permission.

STANDARDS OF CONDUCT

Conflicts of Interest: We are committed to acting in good faith in all aspects of our work. We will take all reasonable precautions to avoid conflicts, or the appearance of conflicts, between our private interests and the performance of our official duties and responsibilities.

- We will not tolerate any business or financial opportunity, which might conflict with the interests of Loudoun Medical Group or those we serve.
- We will report any conflicts or perceived conflicts of interest concerning ourselves, family members or business interests when known to management immediately.
- We do not permit family members to be in direct reporting relationship to each other unless the situation is warranted by special circumstances. In such situations, special oversight will be arranged so that the conflict of interest does not occur between family members with respect to their Loudoun Medical Group duties. We will review all employment situations involving family members, and reserve the right to transfer employees if a conflict does exist.
- We do not solicit or accept gifts, payments, fees, services, valued privileges or other favors where they would, or might appear to, improperly influence the performance of our official duties.
- We do not use our position with Loudoun Medical Group for personal gain or to influence personal decisions of our staff.
- We will not accept outside employment or contracting arrangements that conflict with the interests of Loudoun Medical Group.
- We will ensure that employees, providers, and vendors are not disturbed, interfered with or solicited while carrying out their job duties. Solicitation of patients and visitors are strictly prohibited.

STANDARDS OF CONDUCT

Vendors and Contractors: We are committed to providing all health care services in full compliance with all applicable laws, regulations and guidelines, as well as with its own policies and procedures. Loudoun Medical Group is particularly sensitive to requirements applicable to federal and state health care programs and the submission of accurate bills for all services provided. Compliance by vendors, contractors, consultants, suppliers and agents conducting business on behalf of Loudoun Medical Group or in the Loudoun Medical Group work environment is important to our overall compliance efforts.

- We will make available the Standards of Conduct to all vendors, contractors, consultants, suppliers and agents with whom Loudoun Medical Group conducts business with upon request.
- We will provide access to written compliance policies for any specific risk areas associated with work provided by vendor/contractor services. All vendors, contractors, consultants, suppliers, agents and others doing business with Loudoun Medical Group will be responsible for understanding and fully complying with policies applicable to their activities.
- We will promptly and thoroughly investigate alleged misconduct by vendors, contractors, suppliers and agents performing services for or on behalf of Loudoun Medical Group.
- We will strive, through our compliance efforts, to review all pertinent documents and other information relevant to compliance investigations, including those of or pertaining to outside individuals and entities.
- We will have all vendors doing business on behalf of Loudoun Medical Group screened for exclusion, debarment or other ineligible status utilizing the federal Office of Inspector General and Virginia Office of the Attorney General's list of excluded and ineligible persons.

STANDARDS OF CONDUCT

Communication and Reporting Process: We are committed to creating an open environment for communication for all employees, trustees or agents to be able to address compliance related questions or concerns. A clear process for reporting potential compliance violations is an important part of the Loudoun Medical Group Corporate Compliance Program.

If you have a question or concern about an activity being unethical, illegal, or wrong, or suspect a violation, use the following process to get answers to your questions and to report concerns. Throughout this process, your identity will be kept as confidential as possible.

- Talk to your immediate supervisor first, as he or she should be familiar with the laws, regulations and policies that relate to your work. If your question or concern involves a human resources related matter, you may also speak directly with the Loudoun Medical Group Human Resources representative, tel., (703) 737-6010.
- If you are not comfortable contacting your supervisor, or if you don't receive a satisfactory response, talk to another member of your management team.
- If for any reason you feel you cannot follow the above steps, or if you want to remain anonymous, you may call the Loudoun Medical Group Administration department tel., (703) 737-6003.

Employees have a responsibility to immediately report misconduct, including actual or potential violations of laws, regulations, guidelines, policies, procedures or the Standards of Conduct. No disciplinary action or retaliation will be taken against you when you report a compliance issue in good faith, meaning you believe the information you are reporting is true.

STANDARDS OF CONDUCT

Employee Responsibility: We are committed to demonstrating and promoting a commitment to ethical and legal behavior that is consistent with Loudoun Medical Group's mission and values. All employees are expected to follow all federal, state and local laws, regulations and Loudoun Medical Group policies and procedures. Anyone who has knowledge of a violation must follow the reporting process and report this information. If you do not report a violation, you may be subject to disciplinary action even if you were not directly involved. Reporting does not protect from disciplinary action regarding your own performance or conduct, but should you be directly involved, your honesty will be considered in evaluating appropriate corrective action.

Management: As a leader, you have an obligation to ensure that employees under your supervision:

- Comply with the Loudoun Medical Group Standards of Conduct;
- Know and follow all federal, state and local laws, regulations, guidelines and Loudoun Medical Group policies within the scope of their responsibilities;
- Know the procedure for reporting suspected or actual violations;
- Are encouraged and encourage others to ask questions and report actual or suspected violations without fear of retaliation; and complete all required compliance training.

If an employee comes to you with a question or concern regarding compliance with a federal, state or local law, regulation, or Loudoun Medical Group policy, you are responsible for:

- Taking steps to ensure the employee does not experience retaliation;
- Maintaining the employee's confidentiality to the extent practical;
- Collecting accurate and complete information regarding the employee's report;
- Pursuing the right process so that reports of violations or suspected violations can be further investigated; and
- Informing the employee that you have followed through on his or her report.

CERTIFICATION AND ACKNOWLEDGEMENT

I have received and reviewed the Loudoun Medical Group Standards of Conduct. I understand that the Standards of Conduct apply to my employment and/or contractual relationship and that following all laws, regulations, policies and procedures are a condition of that relationship. I will seek advise from my supervisor, another manager, a Human Resources or Compliance representative with any compliance questions or issues.

Signature

Printed Name

Position and Department/Division

Date

CORPORATE COMPLIANCE PLAN

PURPOSE: To demonstrate our commitment to honest and responsible conduct, decrease the likelihood of unlawful and unethical behavior at an early stage, and to encourage employees to report potential problems to allow for appropriate internal inquiry and corrective action.

Written Policies and Procedures

- Employees are expected to follow the **Standards of Conduct** set forth in this Compliance Program, as well as all applicable laws.
- Employees will conduct business and personal activities with the highest level of integrity.
- No employee shall make, file, or use any false, fictitious, or fraudulent statements or documents in connection with the delivery of, or payment for, health care benefits, items, or services.
- Employees will follow all written Loudoun Medical Group policies and procedures, and service specific guidelines.
- Each employee will be responsible for reporting any violations of this plan per the Loudoun Medical Group communication and reporting process set forth in this compliance program.

Compliance Officer and Compliance Committee

- The Compliance Officer will oversee and monitor implementation of the Corporate Compliance Program. As well as review the program to ensure relevance and compliance with current Federal, state and local laws regulations, guidelines and Loudoun Medical Group policies and procedures.
- The Compliance Committee will advise the Compliance Officer and assist in the implementation of the corporate compliance program.

CORPORATE COMPLIANCE PLAN

Training and Education

- **Initial Compliance Training.** All new employees will receive an initial training session that will cover the topics and guidance set forth in this plan before they begin their assigned duties. Statement acknowledging employee's commitment to and receipt of the compliance plan and standards of conduct will be signed and dated, and retained in the employee's personnel file.
- **Annual Compliance Training.** All personnel will receive training on an annual basis, including appropriate training for those involved in the coding and billing process in Federal , State and Local statutes, regulations and guidelines, and ethics. Sessions will emphasize the organization's commitment to compliance with these legal requirements and policies, compliance program, summarizing fraud and abuse statutes and regulations, Federal, State, coding requirements, claim submission processes, and Standards of Conduct. Statement acknowledging employee's commitment to the standards of conduct will be signed and dated, updated as needed, and retained in the employee's personnel file.

Lines of Communication

- Employees are expected to follow the Communication and Reporting process as outlined in the **Standards of Conduct** set forth in this Compliance Program.
- Loudoun Medical Group encourages an open line of communication between all staff and believes it is critical to the success of our compliance programs.

Internal Monitoring and Auditing

- Employees are expected to follow the **LMG Internal Audit Plan (Attached)** as set forth in this Compliance Program.

CORPORATE COMPLIANCE PLAN

Enforcing Standards through well-publicized disciplinary guidelines

- Disciplinary action will be applicable to all individuals within the Loudoun Medical Group who fail to comply with their obligations. When there is information of potential violations or misconduct, we have the responsibility of conducting an investigation.
- An internal investigation would include interviews and a reviews of medical record, billing and other relevant documents. To assure protections from coerced disclosure of information gained through investigative interviews, the investigation maybe referred to qualified legal counsel.
- The attorney/client privilege will afford a level of protection in the event that the Office of Inspector General or state Attorney General's office requests information developed in the course of an internal investigation.

Responding to Detected Offenses & Undertaking Corrective Action

- Detected Offenses include involvement in non-compliant conduct and/or activity, as well as failure to report known non-compliant conduct and/or activity. This also includes management who are aware or should have been aware of non-compliant conduct or activity and failed to correct deficiencies.
- All violations will be assessed by the Loudoun Medical Group Compliance Committee to determine whether a violation of the Corporate Compliance Program actually exists. If so and the individuals involved are Loudoun Medical Group employees or providers, then a determination that the conduct was negligence and/or inadvertent or willful and/or knowingly conducted should be determined. If the individuals involved are not part of Loudoun Medical Group, the Compliance Committee will forward their findings to the appropriate external source.
- Appropriate corrective action measures shall be determined on a case by-case basis.

CORPORATE COMPLIANCE PLAN

Summary:

Loudoun Medical Group's compliance plan as presented in this document establishes a framework for effective and legal compliance. It does not set forth all of Loudoun Medical Group's programs and policies that are designed to achieve compliance. Those and future policies will be part of the overall compliance enforcement efforts. It is our hope that everyone within Loudoun Medical Group's corporate structure will adhere to the highest standards of ethical conduct in all activities.