

LEON COUNTY E.M.S.

Standard Operating Guideline

Title: Divisional Compliance

Effective: January 2010

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Revision: 1

Pages: 2

I. PURPOSE:

The purpose of this Standard Operating Guideline is to assist employees in identifying policies and procedures related to compliance and to provide guidance on compliance specific to the EMS Division.

II. GUIDELINE:

Leon County Government strives to maintain the highest ethical standards in the way we serve our customers, conduct business and treat our employees. In doing so, Leon County has established standards of professional conduct and a Code of Ethics that must be adhered to by all employees at all times.

- The following list of County policies relates to employee conduct. It is provided for ease of reference and is not a comprehensive list of all County policies.
 - Policy No. 03-05 – Code of Ethics 1.02.1
 - Section II – Conduct - Leon County Policies and Procedures Manual
- Employees must undergo background checks as outlined in Policy No. 03-11 – Background Investigations 11.01.1. In addition, individuals who are found to have been listed as debarred, excluded or otherwise ineligible for participation in federal health care programs will not be allowed to work in the EMS Division.
- The County has established a compliance phone line (850-606-5304) that employees may use to report incidents of fraud, abuse or unethical conduct they are aware of within Leon County Government operations, such as those outlined within the policies listed. Calls made to this report line are not traced and callers may remain anonymous, and Leon County prohibits retaliatory actions against those who, in good faith, call this line or otherwise report such activities. However, there may be circumstances during the course of an investigation in which a caller's identity becomes apparent, and reports may be subject to public records requests. This compliance phone line is an additional tool to report fraudulent, abusive or unethical behavior and does not limit other reporting methods such as making a report to a supervisor or the Deputy Chief of Administration. Internal staff concerns and disciplinary actions should be addressed through County

management and/or human resources' grievance procedures and not this compliance phone line.

- Any supervisor who is made aware of incidents of fraud, abuse or unethical conduct must immediately report such information to the Chief of EMS. If the supervisor believes a conflict exists by doing so, they may report the incident to higher levels in the chain of command.
- In accordance with Section 12.06.8 of the Leon County Policies and Procedures Manual, an exit interview shall be conducted with all employees terminating employment with the County. Misconduct and incidents of fraud or abuse reported at this time will be treated the same as any other report of same.
- The Federal Anti-Kickback Statute provides criminal penalties for individuals or entities that knowingly and willfully offer, pay, solicit or receive remuneration in order to induce business reimbursed under the Federal and State health care programs. Employees are prohibited from such actions to gain business for the Division.
- The Federal False Claims Act prohibits anyone from knowingly presenting, or causing to be presented, a false or fraudulent claim in order to secure payment from the federal government. Employees are reminded that Standard Operating Guideline 119.00, Patient Care Records and Standard Operating Guideline 102, EMS Billing Process, specifically requires that all information presented in the documentation of the care and transportation of patients to be factual. No employee shall engage in making misleading statements or documentation for any reason, including the purpose of obtaining payments. Additionally, employees are required to accurately obtain appropriate patient signatures and information.

The County utilizes a third party for medical billing. The contract with the third party billing vendor requires that the billing vendor have a corporate compliance program in place and functioning. Additionally, an audit of compliance with OIG standards shall be periodically conducted.

All employees of the EMS Division shall be trained on the compliance standards of the County outlined herein. Initial training shall be conducted during the employee orientation program with each employee receiving annual training.