Attachment A

San Francisco Department of Public Health
Compliance Program
Code of Conduct

DPH Compliance Program Mission and Goals

The mission of the DPH Compliance Program is to ensure integrity in DPH clinical and business activities. This mission is carried out through a Compliance Office that is dedicated to the following goals:

- To promote an understanding of and compliance with Medicare, Medi-Cal, and other applicable federal and state laws and regulations;
- To use education and training to improve compliance with billing and reimbursement rules and regulations; and
- To work with providers, managers, and staff to integrate compliance into the daily operations of DPH.

Business Ethics

All employees, contractors, and agents must demonstrate integrity in their business practices in order to instill and preserve trust on the part of our patients. Actions which may be construed as violations of our business ethics include the personal possession and/or use of goods or services that were purchased solely for the Department or its divisions.

Conflict of Interest

Employees, contractors, and agents must not engage in decisions which may result in a personal or financial interest. All business with patients, payers, vendors, contractors, and customers must be conducted without accepting offers, gifts, favors or other improper invitations in exchange for their influence or assistance. Employees, contractors, and agents must consider and avoid actual conflicts, as well as the appearance of conflicts of interest.

Reimbursement Claiming Practices and the False Claims Act

The mission of the San Francisco Department of Public Health is to protect and promote the health of all San Franciscans.

We shall ~ Assess and research the health of the community ~ Develop and enforce health policy ~ Prevent disease and injury ~

~ Educate the public and train health care providers ~ Provide quality, comprehensive, culturally-proficient health services ~ Ensure equal access to all ~
The purpose of documentation is to accurately reflect clinical effort, demonstrate medical necessity, and obtain appropriate reimbursement. Failure to abide by these procedures can lead to criminal and civil liability for the City. As a recipient of Medicare and Medi-Cal funds, and federal and state grants and subventions, DPH has an obligation to comply with all federal and state laws, rules, and regulations.

The principal statute impacting our billing and cost claiming practices is the federal False Claims Act (FCA). Under the Act, it is a felony to make or present a claim for payment, to any United States agency, that is knowingly false, fictitious, or fraudulent.

Actions which may be construed as violations of the FCA, include:
- The refusal to return/refund money to which DPH or City is not entitled;
- The submission of a claim, invoice, or cost report, for reimbursement for goods or services that were not delivered to the Department, were previously reimbursed under a separate program, or that were expended in violation of applicable federal, state, or private foundation grants, or state subventions awarded to the City.

Privacy and Security

All employees, contractors, and agents are required to protect patient health information at all times. Availability to a patient’s electronic health record is limited to those who duties require access. Under no circumstances should electronic health record passwords be shared.

Compliance Hotline

Every Compliance Program needs to have a method, outside of the line of command, for those times when a person prefers not to, or is unable to approach a supervisor, with a question concerning a policy or activity. For this reason, DPH has established a Compliance Hotline. This hotline is intended to be used to report activity and/or conduct that may be in violation of the Code of Conduct, including but not limited to:
- Billing or reimbursement regulations, fraudulent transactions
- Misuse of federal or state grant funds
- Patient Confidentiality
- Conflict of interest
- Falsification of documents
- Sharing passwords to access Electronic Health Record
- Misuse of DPH funded or supported property, facilities and equipment

The number for the DPH Compliance Hotline is 1 (855) 729-6040.

Acknowledgement of the Code of Conduct

My signature on this Code acknowledges that I have read and understand the standards that are included in this Code. I agree to comply fully with these standards. I understand that
violations of the principles embodied in this Code may result in disciplinary action, up to and including discharge.

Name: ________________________________________________________

Class # & Job Title: _______________________________________________

Division: _______________________________________________________

Signature & Date: ________________________________________________