



City and County of San Francisco, Department of Public Health  
Office of Compliance and Privacy Affairs

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# COMPLIANCE TRAINING

For the DPH Health Commission

Compliance & Privacy Toll-Free Hotline: **1-855-729-6040**

# Topics

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1. DPH Compliance Program
2. DPH Code of Conduct
3. Health Commission Responsibilities
4. Healthcare Laws and Regulations (State & Federal)
5. Recognizing and Reporting Compliance Concerns

# DPH Compliance Program

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- DPH Mission, Goals, Program
- Elements of an Effective Compliance Program

# Mission, Goals, Program

1. **Mission:** To ensure integrity in DPH business and clinical operations.
2. **Goals:** To promote an understanding of and compliance with healthcare laws and regulations; to use education and training to improve compliance with coding, billing and documentation; and to work with providers, managers, and staff to integrate compliance into the daily operations of DPH.
3. **Program:** Is operated in accordance with State/Federal standards and regulations, and promotes an environment where potentially improper, fraudulent or abusive activities are prevented, detected and reported. DPH Compliance Program follows the Office of Inspector General's (OIG) recommended seven (7) elements of an effective compliance program.

# Elements of an Effective Compliance Program

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1. Designate a compliance officer and compliance committee
2. Implement written policies and procedures
3. Provide education and training
4. Open lines of communication
5. Conduct internal audits and monitoring
6. Enforcing standards through well-publicized disciplinary guidelines.
7. Prompt response to detected offenses including development of corrective action plans.

# DPH

## Code of Conduct

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The DPH Code of Conduct policy covers many of DPH's business practices and standards.

## About the DPH Code of Conduct:

- The Code helps support the mission of the DPH's Compliance Program.
- The Code describes our commitment to conduct business practices in compliance with all applicable laws and regulations.
- The Code addresses expected behaviors for all to follow, and, provides direction to all DPH employees, contractors, vendors, interns, volunteers, and, others who do business with or on behalf of DPH.

# Elements of the DPH Code of Conduct

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- Appropriate Documentation, Coding and Billing for Services
- Access to Care
- DPH Business Ethics
- Workplace Conduct
- Conflict of Interest



# Health Commission Responsibilities

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- Understand DPH's role and responsibilities in maintaining DPH's compliance program.
- Awareness of the regulations governing provision of care and reimbursement of services.
- Monitor fiduciary duty and advisory oversight for DPH.
- Evaluate structural and operational effectiveness of the DPH Compliance program.
- Ensure methods of encouraging enterprise-wide accountability for achievement of compliance goals and objectives.

# Healthcare Compliance Laws & Regulations (State & Federal)

- False Claims Acts (FCA)
- Deficit Reduction Act (DRA)
- Fraud and Enforcement Recovery Act (FERA)



# Recognizing & Reporting Compliance Concerns

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- Duty of DPH Appointed Officials and Staff
- What Happens if There is a Compliance Violation
- Potential Consequences of a Compliance Violation
- DPH Compliance & Privacy Hotline

# Duty of Appointed Officials and Staff

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- **Comply** with the laws, regulations, standards, DPH Code of Conduct, and other City/DPH policies that apply.
- **Understand** the scope of practice determined by professional licensure, including any restrictions determined by job description and DPH policies and procedures.
- **Avoid actions or activities** that may present as a conflict of interest, or promptly disclose those actions or activities.
- **Actively participate** in compliance activities (e.g., annual compliance training is mandatory).

# Duty of Appointed Officials and Staff (Cont'd)

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- **Build and maintain** a culture of compliance
- **Prevent, detect, and respond** to compliance problems
- **Prevent retaliation** against employees who report violations

DPH employees, contractors, vendors, interns, volunteers and other agents:

- **Have a duty and responsibility** to report misconduct, including actual or potential violations of laws, regulations, policies/procedures, or this organization's standards/code of conduct, as a potential compliance issue.

# What Happens if There is a Compliance Violation?

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- Potential compliance violations will be thoroughly investigated by the DPH Office of Compliance and Privacy Affairs.
- Once an investigation is completed, appropriate action to resolve the violation and prevent recurrence will be taken.
- Actions could include progressive or corrective discipline (suspension, termination, criminal charges, and/or civil penalties and fines).

# Potential Consequences of a Compliance Violation

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Compliance is not just about billing. It also covers quality of care and risk management. A compliance violation could lead to:

- Loss of eligibility to participate in the Medicare/Medicaid programs
- Loss of Medicaid contract
- Reduction in reimbursement rates
- Agency liability for significant paybacks
- Loss of organizational reputation.

**Compliance is everyone's  
responsibility!**



**DPH not only expects, but depends on you to share in this responsibility through the reporting of concerns which involve possible noncompliance with policy or misconduct.**

SAN FRANCISCO DEPARTMENT OF PUBLIC HEALTH  
COMPLIANCE AND PRIVACY

**ANONYMOUS AND CONFIDENTIAL HOTLINE**



**1-855-729-6040**

or

**[compliance.privacy@sfdph.org](mailto:compliance.privacy@sfdph.org)**

**What should be reported:**

- Privacy breaches (report immediately)
- Non-compliance with billing, coding, and documentation regulations
- Issues regarding Code of Conduct or Compliance with DPH Policies
- Suspected Health Care Fraud, Abuse and Waste
- Theft or Misuse of DPH and/or City resources
- Conflict of interest
- Misconduct: Research/Scientific, Workplace Harassment
- Retaliation against the informant

**Reporting Options:**

- Your supervisor/manager
- Your designated Compliance or Privacy Officer
- DPH Office of Compliance & Privacy Affairs Toll-Free Hotline: 855-729-6040 OR [compliance.privacy@sfdph.org](mailto:compliance.privacy@sfdph.org)
- Controller's Office Whistleblower Program, City and County of San Francisco: 415-701-2311 OR [whistleblower@sfgov.org](mailto:whistleblower@sfgov.org) OR you may file online at [www.sfgov.org/whistleblower](http://www.sfgov.org/whistleblower)

**SFDPH has a strict non-retaliation policy!**

**Your Privacy/Compliance Officer & Contact Info:**