We would like to hear from you! Please let us know if there is an additional compliance topic that you would like more information or clarification about.

**COMPLIANCE DEPARTMENT:**
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**OTHER NUMBERS:**  
Covenant Hotline….989.583.4499  
Toll-Free Hotline…..888.421.5776

*Corporate Compliance is on the Covenant Intranet.*

Click on Department Pages and select Corporate Compliance to find our home page which contains information about Corporate Compliance and quick links to:  
- Staff contact information  
- Code of Conduct  
- Compliance Communicator  
- Compliance Info (HcPro)  
- Federal Register  
- Medicare (CMS)  
- Office of the Inspector General

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**Conflicts of Interest in Healthcare:**

A conflict of interest in healthcare can occur when a healthcare professional with a duty to others is influenced by financial or personal reasons involving self-interest. A healthcare professional can be influenced, consciously or unconsciously, creating a risk that professional judgment or actions regarding a primary interest will be unduly influenced by a secondary interest. Covenant HealthCare has several important policies relating to disclosure and management of conflicts of interest aimed at safeguarding our tax-exempt status and managing relationships governed by the Anti-Kickback Statute and Stark law.

**12.09 Conflicts of Interest and 12.12 Ethics of Business Conduct**

Policy 12.09 provides the procedure by which any member of Covenant HealthCare (Board members, Officers, Board Committee members, E-Team members and key employees) will identify and report any actual or potential Conflicts of Interest. Policy 12.09 is complementary to and supportive of Policy 12.12, which states that all Covenant colleagues should conduct his/her duties in a manner that meets the highest legal and ethical standards to protect Covenant’s integrity and welfare. In addition to general conduct expectations, Policy 12.12 contains an Annual Certification and Disclosure of Conflicting Interest form that is sent to all members of Covenant Leadership. It is the responsibility of covered employees to return these forms, and update them as any potential conflicts may arise throughout the year.

Potential conflicts of interest that must be reported include those held by immediate family members or members of your household.
In the News

Two South Florida physicians have agreed to settle allegations that they violated the False Claims Act when their wives accepted salaries from a home healthcare company in exchange for their referrals. One couple agreed to pay $1.047 million, and the other $90,000. It is alleged that A Plus Home Healthcare Inc. paid salaries to the wives for sham marketer positions in order to induce patient referrals from their husbands. According to the lawsuit, the wives had to perform very few, if any, job duties in order to receive their salary. It is also alleged that one of the physicians received payments under a sham medical director arrangement. The United States government previously settled with A Plus and its owner, as well as five other couples that allegedly accepted illegal payments from A Plus.

12.04 Business Courtesies/Gifts

Vendor relationships can be a high-risk area for conflicts of interest, and are subject to the guidelines of Policy 12.04. Gifts must never be accepted or used to improperly influence relationships or business outcomes, and colleagues may never accept a gift of any value during a decision-making process.

12.18 Honoraria

Honoraria for speeches and articles given or prepared by Covenant colleagues as part of their duties for Covenant are to be paid to Covenant unless:

- His/her speech or article is prepared totally outside of work
- There is documented approval from the individual’s Vice President and Corporate Compliance

Honoraria opportunities conducted on an individual’s own time must not conflict with an individual’s job responsibilities.

12.34 Outside Business Activities

Activities related to business outside of Covenant, including personal business, must be conducted on an employee’s own time and must not conflict with any job responsibilities including the use any of Covenant resources. A conflict of interest can occur if decisions pertaining to work at Covenant are influenced, or appear to be influenced, or if business is solicited for another organization while working at Covenant.