

ANNUAL REFRESHER R01

Compliance & Ethics Update

Annual Refresher Training

WHAT YOU'LL REVIEW

Learning Objectives

- 01 Recall the key elements of NobleCare's compliance program
- 02 Identify emerging compliance risks since your initial training
- 03 Apply the three-question compliance decision-making framework
- 04 State the current reporting channels and non-retaliation guarantee
- 05 Certify your understanding of conflict of interest and gift policies

WHY THIS MATTERS

Why Annual Refresher Training?

Healthcare regulations evolve. New enforcement priorities emerge. Staff turnover creates gaps in institutional knowledge.

This annual refresher ensures every employee remains current on the behaviors and standards that protect **patients, the agency, and you.**

Compliance is not a one-time event. It is a daily practice.

COMMON PITFALLS

Top Sources of Compliance Violations

- 01 **Documentation shortcuts** under time pressure
- 02 **Informal financial arrangements** with patients or families
- 03 **Working "off the books"** for agency patients
- 04 **Accepting gifts** valued above \$25 (and never cash or gift cards)
- 05 **Failing to report concerns** because "it probably won't happen again"

DECISION FRAMEWORK

The Three-Question Compliance Test

- 01 Is it **legal**?
- 02 Is it consistent with **NobleCare policy**?
- 03 Would I be comfortable if the **Administrator were watching**?

If any answer is "no" or "I'm not sure" — **STOP** and ask your supervisor.

NEW AND GROWING RISKS

Emerging Compliance Risks

SOCIAL MEDIA HIPAA VIOLATIONS

Employees are the #1 source of preventable breaches. Even vague posts can identify patients.

SCOPE CREEP

Gradually doing more than assigned because families ask and it "seems harmless."

INFORMAL PAYMENT ARRANGEMENTS

Accepting cash or gifts in exchange for "extra" services outside the agency.

REFERRAL RELATIONSHIPS

Accepting anything of value in exchange for referring patients or receiving referrals.

FEDERAL REQUIREMENTS

Exclusion Screening Reminder

NobleCare checks the **OIG exclusion list** and **SAM.gov** monthly for all employees.

Appearing on the exclusion list — for any conviction related to Medicare, Medicaid, patient abuse, or healthcare fraud — results in **immediate termination**.

If you are aware of any legal issue that may affect your eligibility, disclose it to the Administrator immediately.

YOUR REPORTING OPTIONS

How to Report a Concern

You are protected from retaliation for good-faith reports. Silence can make you appear complicit.

- **Your Supervisor:** Sahur Aser, RN BSN — (740) 262-9845
- **Compliance Officer:** Sahur Aser, RN BSN
- **Anonymous Reporting:** compliance@noblecareohio.com
- **Non-retaliation:** Retaliation against any reporter is itself a terminable offense

WHAT WOULD YOU DO?

Scenario

SITUATION

Dena, an experienced caregiver, is approached by the adult son of her patient: *"I know another family that needs help. If you refer them to NobleCare and mention my name, I'll give you \$100 as a thank-you."*

- A) Accept the offer — it's just connecting people who need help
- B) Accept but don't tell NobleCare about the payment
- C) Decline the \$100, explain she cannot accept payment for referrals, and report the offer to her supervisor**
- D) Accept the referral but donate the \$100 to charity

CORRECT ANSWER: C

No Payment for Referrals — Ever

Accepting payment for referrals is a potential violation of the **Anti-Kickback Statute** — even informally, even at the caregiver level, even in a private-pay context.

- It creates a **conflict of interest** and is prohibited by NobleCare policy
- Dena should **decline the \$100** politely
- She should **report the offer** to her supervisor
- The supervisor can follow up with the family through **proper channels**

SUMMARY

Key Takeaways

- Use the **three-question test** before any uncertain action
- Social media and scope creep are the **biggest emerging risks**
- **Never accept payment** for referrals — it's potentially a federal crime
- Gifts from patients: **\$25 max**, never cash or gift cards
- Report concerns in **good faith** — you are protected from retaliation
- **Exclusion screening** happens monthly for all employees

ANNUAL REFRESHER R01 COMPLETE

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Scroll down to complete the Knowledge Check.
5 questions — you need 80% to pass.