



CORPORATE COMPLIANCE

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Associate Administrator
Corporate Compliance Officer

Why Corporate Compliance?

- ▣ Fort Hudson Health System, Inc. (FHHS) is dedicated & committed to meeting high ethical standards of compliance with all applicable laws in all activities regarding the operation of all our affiliated Corporations.
- ▣ The federal government & NYS have enacted laws to combat fraud, waste and abuse of the Medicare & Medicaid programs by providers.
- ▣ The laws require FHHS to implement policies and procedures to ensure compliance with regulations.

Code of Conduct

- ▣ All FHHS employees & independent professional staff, business partners, vendors, & contractors must comply with all the applicable laws & appropriate ethical standards contained in the “Corporate Compliance Manual”.
- ▣ Any violation or deviation may subject to progressive disciplinary action according to the existing FHHS policies which may include suspension, demotion, dismissal from employment or revocation of privileges.

Code of Conduct

- ▣ At any time, a person become aware of any violation of FHHS policies, you **must** report it.
- ▣ All persons making such report are assured that such reports will be treated as confidential to the extent permissible with the FHHS existing policies.
- ▣ FHHS will take **no** adverse action against the persons making such report in good faith and without malicious intent whether or not the report proves to be well founded.
- ▣ If a person does **not** report conduct violating FHHS policies, he/she maybe subjected to disciplinary action.

Standards of Conduct

1. *Resident Care & Rights* – Adhere to all FHHS policies and procedure with regard to resident care & rights.
2. *Referrals* – Federal & State laws prohibits FHHS & its employees from soliciting or accepting or paying in exchange for referrals/ purchasing/ leasing/ services, etc.
3. *Billing & Claims; Cost Reports* – **False billing** is a serious offense. All persons responsible for entering charges and procedure codes are expected to monitor **compliance**. Any false, or questionable claims should be reported immediately to the supervisor, CFO or CCO.

Standards of Conduct

Cost Reports are prepared utilizing generally accepted accounting principles & must document **ONLY** those costs which FHHS employees & or agents believe is in good faith allowable.

4. *Non-Discrimination in Resident/Client Services & Charges* – based on race, color, blindness, national origin, sex, sexual preference, religion, sponsorship or source of payment.
 - **Nothing** of value shall be offered to residents/clients or prospective residents/clients to induce them to utilize FHHS services.

Standards of Conduct

- Any financial accommodation to resident/client based on their “*Financial hardship*” must be documented in writing and approved by CFO & CCO.
 - All discounts, credits, charity care or other arrangement must be approved by CCO in writing.
5. *Confidentiality* – FHHS is committed to maintaining residents/clients sensitive, privileged information. Disciplinary action will be taken against any person violating FHHS existing policies regarding confidentiality.

Standards of Conduct

6. *Business Entertainment or Gifts* – FHHS policy prohibits receiving or giving gifts under circumstances that could be construed as an improper attempt to influence decisions or actions. Gifts may be received or given when they are of nominal value.
7. *Conflicts of Interest* – Do not place yourself in a situation where your personal interests might conflict with the interests of FHHS. For e.g., do not purchase services or products for FHHS from family members or from a personal business.

Standards of Conduct

8. *Credentialing/Exclusion Screening* – Professional staff is subjected to all credentialing requirements based on FHHS existing policies. **Exclusion screening** will be done every 30 days for all FHHS staff, professional staff, vendors, contractors & board of directors.
9. *Political Contributions/Activities* – FHHS is prohibited from directly or indirectly making political contributions or otherwise intervening in any political campaign.

Education and Training

- ▣ All employees, professional staff members , executives and directors are required to participated in **Initial & Annual Training Sessions**. Additionally, periodic training sessions maybe required as per needed.
- ▣ Failure to attend a training session may result in disciplinary action.
- ▣ Any modifications to the Compliance Manual will be distributed by the CCO.

Reporting

- ▣ *How do I report concerns?*
 - ▣ Report the following suspected compliance violations...(but not limited to) : improper coding/ billing, theft, or abuse by an employee, contractor, or agent of FHHS to your immediate supervisor. If you do not feel comfortable contacting your supervisor, please contact:
 - ▣ **Nasar Islam, Corporate Compliance Officer**
- ▣ Call the confidential reporting hotline 518-747-2811 Ext. 261
- ▣ “Click & Report” via online form at www.forthudson.com

Reporting

- ▣ You do not have to identify yourself when you contact us. Please provide us enough information to initiate an investigation. **Specific names, dates, times, locations, and issue-specific facts** will allow us to conduct a full investigation.
- ▣ *Confidentiality* – FHHS is committed to maintaining the confidentiality which is consistent with the existing policy.

Reporting

- ▣ *Investigation* – FHHS will promptly and thoroughly investigate any suspected violation. Investigations will be conducted **internally** by CCO or **externally** by accountants or lawyers. Failure to cooperate during an investigation may result in disciplinary action.
- ▣ *Non-Retaliation* – FHHS will **not** take any retaliatory action or retribution against any individual who has submitted a report of a suspected violation or who has participated in an investigation of a suspected violation.

Disciplinary Procedures

- ▣ **“Progressive disciplinary action”** will be taken against any person found in violation of foregoing Standards which may result in suspension or termination.
 - Deliberately fails to report or withholds relevant information concerning a violation of a Standard.
 - Retaliates against any individual who has either reported or participated in an investigation of a suspected violation of a Standard.
 - Encourages, directs, facilitates or permits either actively or passively non-compliant behavior.

Monitoring & Auditing

- ▣ FHHS will routinely identify compliance risk areas and practice self evaluation including **internal & external audits** as needed.
- ▣ Everyone is required to cooperate with the compliance responsibilities and activities of FHHS.
- ▣ **Being in compliance is everyone's responsibility.**

Why is Compliance important to me?

- ▣ Compliance affects everyone. You are expected to:
 - Carry out your job duties with honesty and integrity.
 - “Do the right thing” when carrying out your job duties.
 - Learn and understand the laws and regulations that apply to your position in order to follow those requirements.
 - **FHHS Corporate Compliance Manual** is available online at **www.forthudson.com**

(Review all applicable “FEDERAL FALSE CLAIMS ACT”, “NYS FALSE CLAIMS LAWS” & “WHISTLEBLOWERS PROTECTION” available on www.forthudson.com - Contact CCO if you have any questions)

Questions?



T ogether

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A chieves

M ission