



Subject:	Effective Lines of Communication and Internal Reporting of Compliance-Related Matters
Endorsed By:	Compliance Committee
Approved By:	Compliance Committee, Board of Managers
DSRIP Implementation Deadline:	April 2015
Effective Date:	October 2015
Supersedes:	April 2015
Purpose:	<p>SI-PPS is committed to the timely identification and resolution of all issues that may adversely affect its participation in the DSRIP program. Therefore, SI-PPS has established communication channels to report problems and concerns, including a Compliance Help Line number and website. The Help Line is available 24 hours, seven days a week at (855-233-3138) or online at statenislandperformingprovidersystem.ethicspoint.com .</p> <p>Individuals are encouraged to report any problem or concern, either anonymously or in confidence via the Help Line, as they deem appropriate. Individuals also have the option of contacting the SI-PPS Compliance Officer directly via telephone at 917-830-1161 or in-person at One Edgewater Plaza, Suite 700, Staten Island, New York 10305.</p> <p>The Compliance Help Line is an avenue by which PPS Associates or other interested parties may report any issue or question associated with any of SI-PPS’ policies, conduct, practices or procedures believed by the individual to be a potential violation of criminal, civil or administrative law, or to constitute unethical conduct.</p>

All individuals are protected from non-intimidation and non-retaliation for good faith participation in SI-PPS' Compliance Program. Failure to report a compliance issue may be grounds for disciplinary action.

Examples of potential compliance issues include, but are not limited to:

- Overpayments
- Medical necessity issues
- False or fraudulent documentation issues
- HIPAA or Patient Privacy issues
- Failure to follow policies and procedures
- Failure to follow the Code of Conduct
- Participating Provider relationship issues such as potential violations of the Stark law or Anti-Kickback statute
- Potential violations of the Anti-Kickback statute related to vendors (e.g., inappropriate gifts)
- Maintaining relationships with PPS Associates excluded from the federal or state health Care Programs
- Inappropriate Conflict of Interest
- Retaliation or Intimidation

Policy:

1. SI-PPS will maintain a confidential Compliance Help Line that individuals may use to report problems and concerns, which is anonymously.

2. Individuals who report problems and concerns via the Compliance Help Line or to the SI-PPS Compliance Officer in good faith are protected from any form of retaliation, intimidation and/or retribution.

3. Information concerning the Compliance Help Line will be posted in prominent common areas of SI-PPS as applicable.

4. All individuals who receive compliance inquiries are expected to act with the utmost discretion and integrity in assuring that information received is acted upon in a reasonable and proper manner. Everyone who receives or is

	<p>assigned responsibilities for assisting with compliance inquiries shall keep the inquiries confidential to the extent possible.</p>
<p>Procedure:</p>	<ol style="list-style-type: none"> 1. The SI-PPS Compliance Officer will ensure that all compliance inquiries are addressed in an appropriate and timely manner, as well as in accordance with this and all related policies and procedures. No attempt will be made to identify a caller to the Compliance Help Line who requests anonymity. Whenever callers disclose their identity, it will be held in confidence to the fullest extent practical. 2. Upon receipt of the disclosure, the SI-PPS Compliance Officer, or his/her designee, shall gather all relevant information from the disclosing individual where practicable. The SI-PPS Compliance Officer or his/her designee shall make a preliminary, good faith inquiry into the allegations to ensure all the necessary information has been obtained and to determine whether a further review should be conducted. 3. SI- PPS shall conduct an internal review of the allegations and ensure that proper follow-up is conducted for any disclosure that is sufficiently specific, so that it reasonably permits a determination of the appropriateness of the alleged improper practice and provides an opportunity for taking corrective action. 4. Calls will be logged in to the Case tracking upon receipt and placed in the care and custody of the SI-PPS Compliance Officer. 5. The investigation and response process may involve other departments, as appropriate, for advice and/or further investigation. 6. The SI-PPS Compliance Officer will communicate matters deemed potentially unlawful to legal counsel for determination. 7. The SI- PPS Compliance Officer will periodically report on Compliance Help Line activity to the Governing Body.
<p>Scope:</p>	<p>SI-PPS Associates (SI-PPS Associates shall mean all individuals and entities that participate in or do business with SI-PPS, including but not limited to its employees, independent contractors, vendors, agents, suppliers,</p>

	executives and governing body members). Participating Providers (as applicable)
Project(s):	
Regulatory Alignment:	New York Social Services Law §363-d subd. 2 and 18 NYCRR §521.3(c),
Reference(s):	
Attachment(s):	none

Reviewed/Revised by Regina Bergren: April 2016

Approved by Compliance Committee: August 2016

Partner Organization	Responsible Staff Name & Title	Date Reviewed	Signature