

 <p>VISITING NURSE SERVICE OF ROCHESTER, NEW YORK</p>	Strong Home Care Group, Inc.	Corporate Compliance
	POLICY: Responsibilities	Policy #102A
	SECTION: 100A	
	Created: 9/1/98	Reviewed: 12/9/04 Revised:
	Approved by: Quality & Compliance Comm. Date: 12/14/06	Reg: COP:

Policy: Strong Home Care Group will designate a Corporate Compliance Officer who has responsibility for overseeing the Compliance Program.

Description:

Corporate Compliance Officer's Responsibilities:

These responsibilities include, at a minimum, the following duties:

1. Assuring that the Organization takes steps to effectively communicate its Standards of Conduct and the VNS Compliance Program to all affected employees and agents.
2. Assuring that the Organization takes all reasonable steps to achieve compliance with its standards by utilizing monitoring and auditing systems designed to detect misconduct by its employees and agents.
3. Investigating detected or reported incidents of possible misconduct with the direction and supervision of legal counsel, as appropriate.
4. Delegating appropriate levels of monitoring and review of systems to other staff to promote effectiveness, efficiency and to avoid any potential conflicts of interest.
5. Reporting compliance activity to the President/CEO and Administrative Team at least semiannually, and to the Board of Directors annually.
6. Documenting compliance activity, follow up and corrective actions taken. (*See attachment: Compliance Issue Report.*)

Responsibilities of All Employees:

The effectiveness of this Compliance Program depends upon each employee's willingness to bring all compliance issues forward either to their own supervisor or VP or directly to the attention of the Compliance Officer. If an employee is unsure of whether a particular situation raises a compliance issue, he or she should err on the side of caution by reporting it. In other words: ***WHEN IN DOUBT, POINT IT OUT!***

1. Training: (Refer to Communication & Education Policy)
2. Knowing and Following Policies:
All employees must know what is expected of them by the Organization as it relates to this Compliance Program. All employees must abide by these expectations and be sensitive to situations that could lead them or others to violate these expectations.
Failure to adhere to the obligations imposed by this Compliance Program may result in termination or other disciplinary action. Claims of ignorance or good intentions will not excuse non-compliance. It is essential, therefore, for all employees to know and adhere to their responsibilities under the Compliance Program.

Responsibilities of Management

All levels of Management, regardless of position, have the primary responsibility to set the standard for compliance. Managers serve as the primary example and the primary source of information to employees.

1. *Training:* Managers must informally and formally communicate the importance of compliance to every employee, and actively promote adherence to the Compliance Program. Managers must promote open communication about compliance, and must answer questions raised by employees, or obtain the answer from the Compliance Officer. Each manager is responsible to ensure that all employees receive compliance training at least annually, and more often as needed.
2. *Knowing and Following Compliance Policies:* Managers have a duty to fully understand the Compliance Program, and to ask any and all questions necessary to clarify their obligations and the obligations of their employees. Managers are responsible for adhering to and assuring that their employees adhere to the Compliance Program. No manager will be excused based on a claim of ignorance or good intentions. Managers who fail to comply with these obligations may be terminated or otherwise disciplined.
3. *Reporting Compliance Issues:* Managers have the responsibility to report all compliance issues (they are aware of or that they suspect) to the Compliance Officer. Managers also have the responsibility to ensure that no employee suffers from any form of retaliation for reporting a possible compliance issue.
4. *Accountability:* Managers are accountable for their own actions as well as the actions of the employees they supervise.

VISITING NURSE SERVICE OF ROCHESTER & MONROE COUNTY, INC.

COMPLIANCE ISSUE REPORT

(CONFIDENTIAL)

Report Date: _____

Received by:

Made by: _____

Position: _____ **Office:**

Method of Reporting: In Person Telephone Contact Letter Contact

Full description of Compliance Issue Raised: (Use back of form if necessary)

Action Taken by Corporate Compliance Officer:

- Not a compliance issue-redirect individual to appropriate manager. Discuss with the President.
- Begin investigative process (describe process below)
- Share on a need to know basis. List individuals who have knowledge of incident.
- Contact counsel.

Comments:

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Resolutions:

Re-education effort Disciplinary action Change in Policy/Procedure
 Disclosure to appropriate agency

Comments: