

2. Information obtained through monitoring efforts will be retained in written form by the Corporate Compliance Officer, and if necessary or desirable, the office of the President/Chief Executive Officer.
3. The Corporate Compliance Officer will also evaluate, no less than annually, the effectiveness of the Corporate Compliance Workplan and other compliance policies and provide the results of such evaluation to the Board of Directors at regularly scheduled meetings of the Board on a quarterly basis.

Investigation:

1. Reports received through either the Compliance Hotline or by direct report to the Corporate Compliance Officer, or through some other monitoring mechanism shall be initially assessed by the Corporate Compliance Officer.

If the initial assessment indicates that there is a basis for concluding that the conduct reported constitutes noncompliance with the Corporate Compliance Plan, applicable state or federal law, or other corporate policy, the matter shall be referred to the Corporate Compliance Committee for review and investigation.

The Corporate Compliance Officer, in conjunction with the Corporation's legal counsel, will be responsible for directing the investigation and may solicit the support of internal and external resources to conduct the investigation.

2. The following steps should be undertaken when any report or activity giving rise to an investigation occurs:
 - Notify the President/Chief Executive Officer regarding the nature of the complaint.
 - Commence the investigation as soon as reasonably possible, but in no event more than thirty (30) days following the receipt of the report, information, or complaint regarding the potential noncompliance.
 - Interview the person or persons involved in or having knowledge of the potential noncompliance.
 - Review the statutes, regulations, and policies involved.
 - Prepare a summary report with recommendations on corrective actions, including recommended disciplinary measures to be taken against the person or persons whose activities or conduct is the subject of the investigation.
 - Correct the problem and initiate disciplinary action and appropriate education/training to prevent recurrence of the problems.
 - Repay any overpayments uncovered during an investigation (with interest, if appropriate).
 - Determine, in conjunction with legal counsel, whether any pattern of noncompliance exists that would require reporting to an appropriate government agency within 60 days of the discovery of the credible evidence of noncompliance or fraud.

- In the event of a reportable noncompliance and/or repayment event, follow the current guidelines for self-reporting as published by the Office of the Inspector General (HHS) or the Office of the Medicaid Inspector General (New York State).

References: OIG Compliance Program Guidance for Hospitals (1998)
OIG Supplemental Compliance Program Guidance for Hospitals (2005)
Final Compliance
Program Guidance for Individual and Small Group Physician Practices
(2000)

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Revised: 2/12, 9/12

POL:CORPCOMPL

Committee Approval: Corporate Compliance Committee

Distribution: Original – Administration; Copy – Via Meditech

Signature: Amy Dollard Date: 9/27/12