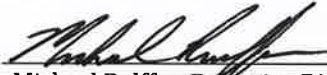


Policy Title:	Compliance Participation and Discipline
Policy Number:	100-11
Effective Date:	8/1/2019
Revised Date(s):	1/14/2022
Regulation Reference (if applicable):	NYS SSL §363d; 18 NYCRR Part 521; New York State Labor Law Section 740
Reviewed/Approved By:	
	
Michael Rulffes, Executive Director	2/15/22 Date

I. Policy:

It is the responsibility of every Crouse Medical Practice employee, Board of Directors, and others who provide services on behalf of the practice to abide by applicable laws and regulations, support the Practice's compliance efforts, and to participate in the corporate compliance program. Accordingly, each employee, Board member and others who provide services on behalf of the Practice must report his/her good faith or reasonable belief of any suspected or actual violation of applicable local, state or federal law or Practice policies and procedures, including, without limitation, the Practice's compliance program and code of conduct. A violation could be fraudulent billing suspicion, incorrect patterned claim activity, misrepresentation, stealing, breach of rules both internal and external, etc. In support of this principle, the Practice has also adopted a strict non-intimidation, non-retaliation stance prohibiting any intimidation and/or retaliation to anyone who reports a suspected or actual violation in good faith or that the individual reasonably believes is a violation of law, rule or regulation or that the employee reasonably believes poses a substantial and specific danger to the public health or safety.

II. Procedure:

A. Obligations to Participate in Compliance Program

1. All Practice employees and the Board of Directors are required to abide by applicable state and federal laws and regulations, and all policies and procedures of the Practice, including without limitation the compliance program and the code of conduct. Others who provide services on behalf of the Practice are also expected to abide by state/federal laws & regulations and applicable policies/procedures.
2. Employees, the Board, and others who provide services on behalf of the Practice shall report suspected, potential or actual violations of applicable law and regulations, the compliance program and/or code of conduct (Refer to *Whistleblower: Compliance Reporting Policy*).
3. Failure by an employee, the Board, or others who provide services on behalf of the Practice, to report possible improper conduct is itself a violation of Practice policy, the corporate

4. compliance program and the code of conduct and may be subject to discipline, up to and including termination; or may subject the contractor to sanctions.
5. Employees shall participate in compliance education and training during New Employee Orientation and at least annually thereafter, and shall participate in compliance activities and additional training as required by their respective departments.

B. Confidentiality

The Practice shall take reasonable and appropriate efforts to maximize a reporting employee's confidentiality and will honor all requests for confidentiality to the limit allowed by law. Staff, Board, and others who provide services on behalf of the Practice, are expected to assist in the resolution of the compliance issue. In the event the Practice must take a course of action that could reveal the identity of a reporting employee, the Practice shall, to the extent reasonably feasible, notify the employee of such intended course of action.

C. Disciplinary Action

Employees, Board, and others who provides services on behalf of the Practice actions (or inaction) that may result in discipline, include, but are not limited to the following:

1. Authorizing or participating directly in actions that are in violation of any applicable local, state or federal law/regulation or the compliance program, the code of conduct or other Practice policies and procedures.
2. Deliberately failing to report a violation or deliberately withholding relevant and material information concerning a violation.
3. Retaliating, directly or indirectly, or encouraging others to do so, against anyone who reports a violations;
4. Fabricating or knowingly misrepresenting facts concerning a compliance investigation.
5. Encouraging, directing, facilitating or permitting, either actively or passively, non-compliant behavior and;
6. Stealing

D. Fair Enforcement of Discipline

The Practice shall enforce sanctions and discipline resulting from a violation of this policy, in a fair and consistent manner, in accordance with applicable Human Resources policies and procedures.