

ADDENDUM

REFUAH COMMUNITY HEALTH COLLABORATIVE

**New York State Delivery System Reform Incentive
Payment (“DSRIP”) Program**

Performing Provider System Standards of Conduct

Manual Section: Compliance-DSRIP	DSRIP-COMP-01
Subject: Standards of Conduct	Page: 1 of 4

POLICY: RCHC Personnel and PPS Providers are responsible for ensuring that their conduct and those that perform DSRIP Program-related activities on their behalf (including employees, agents, and contractors) (collectively “Personnel”) are consistent with (1) these Standards of Conduct (“Standards”), (2) RCHC’s Compliance Program and policies and procedures, (3) the DSRIP program, and (4) generally accepted standards of professionalism, courtesy, and respect. All Personnel are required to agree to abide by these Standards of Conduct by signing and returning the certification attached to these Standards as Exhibit A.

I. COMMITMENT TO LAWS AND REGULATIONS

A. Compliance with Standards of Conduct

All Personnel are responsible for maintaining an ethical and compliant environment in the implementation and operation of the DSRIP Program and are expected to be familiar with federal and state laws and regulations relating to the DSRIP program. Personnel may not engage in any illegal conduct and must never use their position for purposes that are, or appear to be, motivated by a desire for private financial gain for themselves or others. If any Personnel are unsure whether an activity is considered unlawful, they should check with their supervisor or the Chief Compliance Officer.

These Standards impose an affirmative duty on all Personnel to report any actual or perceived violations and RCHC will devote sufficient resources to investigate any alleged violation of these Standards. No adverse action or retribution will be taken against any individual who reports in good faith a suspected violation. Activity violative of these Standards of Conduct will be subject to corrective action up to and including expulsion from RCHC.

B. RCHC Policies and Procedures

Personnel are expected to be familiar with and abide by RCHC’s Compliance Program and policies and procedures.

C. Recordkeeping

Personnel must not knowingly present or cause to be presented documents or claims for DSRIP program payments that are false or fraudulent based on inaccurate information. All Personnel are expected to appropriately and accurately record and report DSRIP-related information, transactions and activities, including records related to patients and their care, in a timely manner. All reports

submitted for DSRIP program payments and governmental agencies must contain accurate and complete information.

D. Excluded Individuals

RCHC and PPS Providers shall not knowingly include in its network any individual or entity that is listed as excluded, debarred, or as otherwise prohibited from participation in federal or state health care programs. The Chief Compliance Officer shall ensure the routine screening of such lists of excluded and ineligible persons to ensure that any changes in status are identified. Personnel who are disbarred, excluded, or otherwise rendered ineligible for federal or state health care programs must immediately report that information to his/her organization or the Chief Compliance Officer or his/her delegate.

II. CONFIDENTIALITY

A. Confidential Information- Patient

All Personnel must abide by the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”) as well as other federal and state statutes regarding privacy standards that protect patient health information. Personnel must treat patient information with the utmost confidentiality at all times and have a duty to report to their supervisor or the Chief Compliance officer any allegation or improper disclosure of protected health information for further investigation.

B. Confidential Information- Business

Personnel may gain access to confidential (i.e., non-public) information by virtue of his/her participation in or position within their respective organization.

Personnel may not communicate confidential information about its organization, partners, or any patients covered by the DSRIP program as it pertains to RCHC, including information of or about another RCHC participating entity or its patients, to anyone and may not be used as a basis for personal or family gain. The term “confidential or proprietary information” shall mean any and all information (whether written, oral, or contained on audio tapes, video, computer discs, email, other electronic format, etc.), relating to the business operation, financial condition, clinical care, or medical status of RCHC and any of its participants and patients.

III. COMMITMENT TO COMPLIANCE

A. Violations of the Standards of Conduct

Suspected violations of these Standards of Conduct should be reported immediately to an individual’s organization or the Chief Compliance Officer.

B. Concerns

Should you have any questions or concerns regarding any RCHC or DSRIP Program-related issue, especially those related to these Standards of Conduct, you are encouraged to first speak with your immediate supervisor or other authorized person within your organization. If, however, you feel that your organization has not reasonably resolved a particular issue, Personnel may contact the Chief Compliance Officer directly or through the Compliance Hotline at (844) 280-0009. All calls received will be kept confidential and, if you desire, your anonymity will be protected to the extent

permitted by law. However, the desire to preserve anonymity may hinder the completion of a thorough investigation.

Responsible Party: Azizza Graziul, Esq., Chief Compliance Officer

Approved: 2/2016

Reviewed: 2/2016, 4/2017

Revised:

This policy and procedure shall be periodically reviewed and updated consistent with the requirements and standards established by the Executive Governing Body and Federal and State law and regulations.

Exhibit A

Certification of Commitment to Comply with Standards of Conduct

I hereby acknowledge and certify that I have received and reviewed a copy of RCHC's Standards of Conduct and I understand that they represent mandatory policies of the RCHC.

By signing this form below, I agree to abide by these Standards of Conduct during the term of my association with RCHC or while otherwise authorized to serve on RCHC's behalf. In addition, I acknowledge that I have a duty to report any suspected or known violation of the Standards of Conduct or any RCHC policy or procedure to my organization or the RCHC Chief Compliance Officer.

Please return this completed, signed Certificate of Commitment to the RCHC Project Management Office.

Date

Signature

Printed Name

Position / Title