

## **Finger Lakes Community Health Corporate Compliance Plan**

Since 1989, Finger Lakes Community Health\* has been providing high quality primary medical care, dental, behavioral health and telehealth services to migrant and seasonal farmworkers and community members throughout the Finger Lakes region and CNY as well as in Upstate NY with the migrant voucher program. To enhance as well as preserve our well-deserved positive reputation as providers of these services, everyone associated with Finger Lakes Community Health (FLCH) must share a commitment not only to our patients and our work but also to compliance with the numerous federal, state and local laws, regulations and policies that govern our conduct. To assist us in maintaining fidelity with our compliance goals, we have developed the FLCH Compliance Plan that briefly summarizes the various legal and ethical requirements that we must meet. Here is our Compliance Plan.

The FLCH Corporate Compliance Program (CC) demonstrates the health center's strong commitment to honest and responsible conduct; improves the quality, efficiency, and consistency of health care services and operational/administrative activities while reducing related cost; and improves the efficiency and effectiveness of employees' and contractors' performance. The CC is designed to ensure the health center is compliant with all laws, regulations and policies that apply to our organization. FLCH:

- Has designated a Chief Compliance Officer and Program Development Officer as their chief compliance officer;
- Has designated a Compliance Committee comprised of a minimum of one (1) Board member; Chief Executive Officer (CEO); Chief Financial Officer (CFO); Chief Medical Officer (CMO); Dental Director; Director Of Operations; IT Coordinator; Chief Compliance Officer; Director of Clinical Services; and Director of Human Resources;
- Conducts internal audits and monitoring processes;
- Has developed written CC policies and procedures (available for inspection);
- Conducts appropriate and regular training and education for Board and FLCH employees alike;
- Develops effective lines of communication in accordance with the FLCH organizational chart;
- Investigates detected problems and develops corrective action plans;
- Promotes the CC Hot Line (315.220.0076) through internal communications and as part of orientation and ongoing training provided to FLCH Board and employees alike;
- Enforces disciplinary standards through well publicized guidelines including policies governing compliance training/education, compliance communications, intimidation/retaliation, and identification of risk areas, in accordance with the existing FLCH employee handbook and through regular all staff meetings and staff newsletter when published;
- Created a Compliance Hot Line for anonymous calls to report concerns about compliance-related concerns at 315.220.0076.

All FLCH employees, board members, and independent contractors and vendors are strongly encouraged to bring concerns to the attention of the Compliance Officer (607-403-0065) or to use the Hot Line number that appears above. Reports may be made in writing, in person or via the telephone. Written communications should be marked "CONFIDENTIAL DO NOT OPEN" to the attention of: James X. Kennedy, Chief Compliance Officer, c/o Ovid Community Health Center, PO Box 902, 7150 N. Main St.,

Ovid NY 14521. All reports and communications will be confidential and privileged to the extent permitted by law.

\*legal entity Finger Lakes Migrant Health Care Project, Inc.