



Finger Lakes Community Health Corporate Compliance Plan

Since 1989, Finger Lakes Migrant Health Care Project, Inc. (doing business as Finger Lakes Community Health) has been providing high quality primary medical care, dental, behavioral health and telehealth services to migrant and season farmworkers and community members throughout the Finger Lakes region and CNY as well as throughout New York State 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 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 maintain fidelity to our compliance goals, we have developed the Finger Lakes Community Health Compliance Plan that briefly summarizes the various legal and ethical requirements that we must meet. Here is our Compliance Plan.

The Finger Lakes Community Health Corporate Compliance Program 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 Corporate Compliance Program is designed to ensure the health center is compliant with all laws, regulations and policies that apply to the health center. Finger Lakes Community Health has:

- Designated the Director of Operation and Corporate Compliance Officer as their chief compliance officer;
- Designated a Compliance Committee comprised of a minimum of one (1) Board member; the Chief Executive Officer; Chief Financial Officer; Medical Director; Dental Director; Jr. Systems Administrator; Director of Operations and Chief Compliance Officer; Director of Clinical Services, Director of Dental Services and Director of Human Resources;
- Conducts internal audits and monitoring processes;
- Developed written Corporate Compliance Program policies and standards and procedures (available for inspection);
- Conducts appropriate and regular training and education for Board and Finger Lakes Community Health employees alike;
- Develops effective lines of communication in accordance with the Finger Lakes Community Health organizational chart Investigates detected problems and develop corrective actions

Administrative Offices • 14 Maiden Lane • PO Box 423 • Penn Yan, NY 14527
p: 315-531-9102 • **f:** 315-531-9103 • **w:** www.localcommunityhealth.com

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- Promotes the Corporate Compliance Program Support Line (315.220.0076) through internal communications and as part of orientation and ongoing training provided to Finger Lakes Community Health 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 Finger Lakes Community Health 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 Finger Lakes Community Health employees, board members, and independent contractors and vendors are strongly encouraged to bring concerns to the attention of the Director of Operations and Corporate Compliance Officer by phone at 315-924-6120, by mail at 14 Maiden Lane, PO Box 423, Penn Yan, NY 14527, by email at Lawreen@flchealth.org or by use of the Hot Line toll-free number that appears above. Reports may be made in writing, in person or via the telephone. Written communications should be marked "CONFIDENTIAL". All reports and communications will be confidential and privileged to the extent permitted by law.

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