



Title: Compliance Plan and Code of Conduct		Policy #: CP001
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I. **Policy**

It is the policy of Finger Lakes Independent Provider Association (FLIPA) to develop, maintain, and update as appropriate a written Compliance Plan and Code of Conduct to provide employees, Board members, vendors and contracted staff with guidance on requirements for conduct related to employment or engagement by FLIPA.

The Code of Conduct describes important parts of the compliance program including, but not limited to the problem resolution process, compliance hotline, and non-retaliation policy.

All employees, Board members and contracted staff will be provided a copy of the Code of Conduct and Compliance Plan upon hire/engagement/association and upon substantial revision. The Code of Conduct and Compliance Plan will be readily available to associated individuals by request or on FLIPA's Teams Channel.

II. **Procedures**

A. Development and Oversight

1. The Compliance Officer is responsible for the development and periodic update of FLIPA's Compliance Plan and the FLIPA Code of Conduct.
2. The Board of Directors is responsible for oversight of the Compliance Plan and the Code of Conduct.
3. The Code of Conduct document is written at a basic reading level, avoiding complex language and legal terminology. At a minimum, it addresses critical areas such as compliance with laws and regulations, human resource practices, quality of care/service, conflicts of interest, proprietary rights, confidentiality, safety, and reimbursement practices.

B. Content

1. The Code of Conduct addresses major issues identified by the Federal Sentencing Guidelines, the Office of Inspector General (OIG) and the New York State Medicaid Inspector General (OMIG).
2. The Code of Conduct addresses human resources related compliance issues such as sexual harassment and discrimination, as well as FLIPA's commitment to quality service.
3. Both the Compliance Plan and Code of Conduct include instructions on how to report fraud, waste and abuse, suspected violations or other suspected wrongdoing

C. Distribution

1. FLIPA's Compliance Plan, applicable policies, and the Code of Conduct will be available to all Board members, employees, and contracted staff. It will be available on the FLIPA intranet. All employees, Board Members and contracted staff will acknowledge: (a) having available a copy of the Compliance Plan and Code of



Conduct, (b) reading and understanding the contents, and (c) agreeing to abide by the provisions of the documents. Information about the Plan and the Standards of Conduct will be available on the FLIPA website.

2. The Compliance Officer will ensure that sign off records are maintained.
3. The Compliance Officer will ensure that each Board member is provided with a copy of the Compliance Plan and the Code of Conduct at the time of Board Orientation and upon any significant revision.
4. The Compliance Officer will ensure that all contracted staff are provided with a copy of the Compliance Plan and Code of Conduct upon entering into a contractual agreement with FLIPA.
5. The Compliance Officer will include in his or her report to the Compliance Committee and Board of Directors the status of training, along with any recommendations for updating or improving the contents of the Compliance Plan or the Code of Conduct.

D. Violations

1. The Compliance Officer is responsible for investigations of possible violations of Compliance Plan and/or Code of Conduct and, in conjunction with Human Resources, assuring disciplinary action is taken when necessary.