

## COMPLIANCE PROGRAM

The compliance program is designed to promote adherence to appropriate standards of business conduct throughout all aspects of the organization's operation and to ensure conformance with applicable federal and state regulatory obligations by the organization and its employees, board members, committee members, consultants, providers, FDRs and vendors. The organization complies with all Federal and State requirements.

The organization is responsible for implementing the Compliance program; implementing, monitoring, maintaining, and enforcing the Standards of Conduct and Code of Ethics; developing and adopting policies and procedures pertaining to ethical conduct; ensuring a prompt response to inquiries and reported violations; and imposing disciplinary actions related to compliance violations.

It is every Associate's responsibility to prevent, detect, and correct fraud, waste, and abuse and report instances of noncompliance to the organization's compliance officer, State Medicaid Agency, CMS, CMS' designee and /or law enforcement.

The organization's compliance officer is responsible for all aspects of the organization's compliance program. The compliance officer is the organization's link to important compliance information and education. All employees are encouraged to seek guidance concerning any obligations and report any instances of noncompliance.

The organization provides several resources for assistance and reporting. Reporting may be done anonymously:

Florida State Attorney General:	1-866-966-7226
Agency for Health Care Administration, Medicaid Program Integrity:	1-888-419-3456
Department of Financial Services, Division of insurance Fraud:	1-800-378-0445
Department of Health & Human Services, Office of Inspector General:	1-800-447-8477

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It is every associate's responsibility to prevent, detect, and correct fraud, waste and abuse and report instances of noncompliance to the organization's compliance officer. Once a report is received, the compliance officer will evaluate/investigate the complaints and allegations to determine whether the information adequately warrants action against named parties or corrective action measures.

Those who report concerns may choose to remain anonymous. All reports of potential violations will be kept confidential. If you choose not to remain anonymous, your identity will not be disclosed unless it is absolutely necessary during an investigation. Retaliation and/or intimidation for good faith reporting of a violation of the Standards of Conduct, law or regulation is strictly prohibited and may be illegal. If someone has been retaliated against for reporting a potential violation or cooperation in an investigation, they should immediately contact the compliance officer.

### **Disciplinary Actions for Compliance-Related Violations**

1. Verbal Caution: An employee will be given a verbal caution when he or she engages in problematic behavior. As the first step in the progressive discipline policy, a verbal caution is meant to alert the employee that a problem may exist or that one has been identified, which must be addressed. Verbal warnings will be documented and maintained by your supervisor. A verbal caution remains in effect for 3 months.
2. Verbal Warning: A verbal warning is more serious than a verbal caution. An employee will be given a verbal warning when a problem is identified that justifies a verbal warning or the employee engages in unacceptable behavior during the period a verbal caution is in effect. Verbal warnings are documented and placed in the employee's personnel file and will remain in effect for 3 months.
3. Written Warning: A written warning is more serious than a verbal warning. A written warning will be given when an employee engages in conduct that justifies a written warning or the employee engages in unacceptable behavior during the period that a verbal warning is in effect. Written warnings are maintained in an employee's personnel file and remains in effect for 3 months.
4. Suspension: A suspension without pay is more serious than a written warning. An employee will be suspended when he or she engages in conduct that justifies a suspension or the employee engages in unacceptable behavior during the period that a written warning is in effect. An employee's suspension will be documented and, regardless of the length of the suspension issued, will remain in effect for 3 months.
5. Decision Making Leave: Generally following a suspension, an employee will be reprimanded then sent home for the day on decision making leave. This is intended to help the employee decide whether they should continue employment. If the employee returns, he or she will be expected to work harder than before to follow the guidelines and continue his or her employment without interruption. The other option with this leave is the employee may choose to resign because employment is not a match.
6. Termination: An employee will be terminated when he or she engages in conduct that justifies termination or does not correct the matter that resulted in less severe discipline.