

Corporate Compliance Policy

Purpose

To ensure the Agency upholds the highest principles and conducts business within strong ethical standards, the Agency has established a code of conduct as well as corporate compliance guidelines and a reporting system adopted by the Board of Directors.

The Agency's Compliance program meets the seven (7) elements of an effective compliance program and also includes proactive procedures to address fraud, waste and abuse.

Policy

RCIL's Compliance Department applies to the following affected individuals: employees, chief executive & senior administrators, managers/supervisors, governing body, contractors, agents, subcontractors and independent contractors.

The Agency follows the below seven (7) elements based on New York Codes, Rules and Regulations (NYCRR) 18 Part 521:

1. Written policies and procedures that describe the operation of the compliance program, legal and ethical obligations related to compliance program requirements and standards of conduct that promote compliance expectations. The written policies, procedures and standards of conduct will be reviewed annually.
2. RCIL's Compliance Officer is the designated employee vested with responsibility for the day-to-day operation of the compliance program. The Compliance Officer develops an annual compliance workplan that outlines strategy for meeting compliance program requirements that address the elements of an effective Compliance Program.

RCIL's Compliance Officer coordinates with RCIL's Compliance Committee. The compliance committee charter outlines the duties, responsibilities, membership, designation of a chair, and frequency of meetings.

3. Training and education for all affected individuals. The Compliance Officer maintains an ongoing training plan.
4. Open lines of communication for anyone to report compliance issues including all identified affected individuals and Medicaid recipients of service, along with a Corporate

Compliance Confidential Hotline and Email Account. RCIL's Hotline Number is 315-272-2905 and dedicated compliance email is Compliance@rcil.com.

5. Disciplinary policies to encourage good faith participation in the compliance program including policies that describe expectations for reporting compliance issues and outline sanctions for failing to report such issues. Written policies establishing disciplinary standards are disseminated to all affected individuals.
6. A self-evaluating system to routinely monitor, audit and identify compliance risks and concerns including an annual compliance program review and checking monthly for excluded providers.
7. A system to respond to compliance issues, prevent future compliance issues and to ensure compliance with state and federal laws, rules, regulations, and requirements of the Medicaid program. All identified concerns will be promptly and thoroughly investigated by RCIL's Compliance Department and findings that warrant correcting will be diligently followed up on.

RCIL operates in compliance with all applicable state and federal laws and regulations including the Federal Deficit Reduction Act, Federal False Claims Act and New York State False Claims Act. Employees are expected to follow all applicable state and federal laws and regulations including Medicaid requirements.

Standards of Conduct:

- The Agency utilizes an Organizational chart to clearly outline administrative overview, lines of communication and authority hierarchy. RCIL's Compliance Program is supported by RCIL's Leadership.
- A written policy for non-intimidation and non-retaliation for good faith participation in the compliance program.
- All assets of the Agency are for the purpose and use of the agency. Any employee using agency assets for temporary personal use must have prior supervisor approval.
- To avoid any conflict of interest, no employees should accept (or permit family members to accept) gifts, payments or services from businesses and individuals that sell (or are seeking to sell) goods and services to the Agency and/or to participants.
- All employees will adhere to the Agency Code of Conduct, and any employee who has access to cash or checks will not embezzle or otherwise misappropriate funds from the Agency or participants.
- All reports (financial, board of director or otherwise) will be represented accurately and thoroughly and without willful or purposeful misrepresentation.
- Agency practices will adhere to the Equal Employer Opportunity Policy to discourage any discrimination practices.
- No employees will engage in any Medicaid fraud, waste or abuse.

- Agency will conduct its business by following the terms of the grant contracts as intended for each program.
- All employees will adhere to the HIPAA Federal Law to assure individuals' confidentiality when maintaining, discussing or disclosing Protected Health Information (PHI) as it relates to agency business, Board Officers and workers.
- The Agency will adhere to Medicare/Medicaid Anti-Kickback rules and no employees will engage in any knowing or willful offers, payments, solicitations, or receipts of remuneration in order to induce business reimbursed under the Medicare or Medicaid programs.
- The Agency will not engage in any activity that will jeopardize or violate its tax-exempt status.
- There will be no force or coercion used over someone to solicit contributions.
- The Agency will uphold all policies and procedures and adhere to all legal and ethical obligations.

Proactive Compliance Program

- The Corporate Compliance Hotline is intended to provide a private means to report issues that are considered to be of importance. Callers to the Corporate Compliance Hotline will not be retaliated against. To the extent possible, all Corporate Compliance Hotline calls will be maintained as confidential.
- The Corporate Compliance confidential reporting system may be accessed through the Corporate Compliance Hotline at 315-272-2905 or compliance email, Compliance@rcil.com. The Hotline is available 7 days a week, 24 hours a day.
- Regular internal audits on programs to prevent, detect and correct noncompliance with regulatory requirements.
- Written policies and procedures are in place to help guide agency conduct and behavior (e.g., whistleblower policy and code of conduct policy)
- Publicly displayed Corporate Compliance Hotline flyer posted on the agency website.
- Immediate response and action to compliance issues.
- Policies are reviewed annually to help be in line with current practice.
- Intermittent research of the most current federal, state and local agency regulations and laws.
- If an employee has a reasonable belief that the Agency or another RCIL employee has engaged in any action that violates any applicable law, or regulation, including those concerning accounting and auditing, or constitutes a fraudulent practice, the employee is expected to immediately report such information to the Chief Executive Officer, Chief Corporate Compliance Officer or the Executive Vice President of Corporate Resources.

Reduction of Fraud / Waste & Abuse

- RCIL strictly adheres to the Deficit Reduction Act (2005) in enhancing program integrity and reducing/eliminating Medicaid fraud, waste and abuse.
- RCIL strictly adheres to the Federal False Claims Act, which refers to people who knowingly submit, conspire to commit or disregard the truth in submitting a false claim for government reimbursement or payment. Anyone discovered to be submitting false claims will lead to an investigation and possible legal consequences for their actions.
- Concerns of Medicaid Fraud will be reported to the Attorney General's Office or the Office of the Medicaid Inspector General (OMIG).

Reporting of Violations

If an employee has a reasonable belief that the Agency or another RCIL employee has engaged in any action that violates any applicable law, regulation or policy, including those concerning accounting and auditing, or constitutes a fraudulent practice, the employee is expected to immediately report such information.

Employees are required to report such issues to their supervisor, Executive Vice President of Corporate Resources, Chief Corporate Compliance Officer or the Chief Executive Officer.

No Retaliation

RCIL will not retaliate, intimidate, threaten, discriminate or otherwise take any adverse employment action against an employee who files a complaint, testifies or assists in any complaint made under this policy or with a court or government agency.

Furthermore, RCIL prohibits an employee from intimidating, threatening or retaliating against a coworker or non-employee for filing a complaint and/or participating in an investigation.

Investigation of Violations

RCIL will promptly investigate any reported potential compliance, regulation, or policy or procedure violation. All reported issues are treated confidentially.

All identified concerns will be promptly and thoroughly investigated by RCIL's Compliance Department and findings that warrant correcting will be diligently followed up on.

All identified affected individuals are expected to fully cooperate in any investigation of a potential compliance concern.

Discipline for Violations

All identified affected individuals should do what is permissible, acceptable and expected. Failure to comply with RCIL's Compliance Program including a violation of RCIL policies and procedures may consequently receive appropriate disciplinary action up to and including termination.

Compliance Training Plan:

RCIL Employees, Board Members and Contractors will receive initial and annual training on Compliance Standards and Expectations.

The training will include the following topics:

- RCIL's Compliance Program implementation
- Medicaid Fraud
- The Health Insurance Portability and Accountability Act of 1996 (HIPAA)
- Review of relevant Policy and Procedures

Attendance will be tracked in collaboration with the Compliance Department, RCIL's Staff Development Trainer, the Human Resources Department and designated Program Department staff.

The effectiveness of the training will be evaluated through various measures including post training quizzes, surveys, and one to one discussion.