

## LIFEPlan CCO NY CORPORATE COMPLIANCE INFORMATION

LIFEPlan CCO NY is dedicated to providing services in compliance with all State and Federal laws governing its operations and consistent with the highest standards of business and professional ethics.

LIFEPlan staff, contractors, vendors and are responsible for understanding and complying with the Company's Compliance Program, meeting all regulatory requirements, reporting all known or suspected violations of fraud or abuse, and assisting in the resolution of compliance issues. Failure to perform these duties is a violation in itself.

Examples of Compliance violations that would need to be reported include, but are not limited to, the following:

- Disclosing or using confidential information regarding the Company, staff, or Members.
- Billing for services that were not provided.
- Falsifying Company financial documentation.
- Accepting a bribe from a vendor or contractor for Member referrals.
- Falsifying Member documentation (Life Plans, Progress notes, monthly summaries) to justify payment.
- Documenting & billing for services provided by another staff person.

### Compliance with False Claims Laws

All staff and volunteers of LIFEPlan have a responsibility to report concerns about any real or potential non-compliance with applicable federal, state, or local laws, and LIFEPlan policies and procedures. Federal and State False Claims laws extensively regulate healthcare activities to prevent fraud and abuse. As part of LIFEPlan's Compliance Program, staff will receive training about these regulations, which are summarized below. Staff who have questions about the application of these laws should consult with their immediate supervisor or the Compliance Officer.

### False Claims Act

It is a violation of Federal and State False Claims Acts ("FCA") for anyone to knowingly submit, or cause another to submit, false claims for payment of government funds. Examples of FCA violations include: filing a claim for services that were not rendered; filing a claim for services that were not necessary; or submitting a claim containing information known to be false. Anyone who suspects a violation of Federal or State FCA, LIFEPlan's Compliance Plan, the Code of Ethics, or other LIFEPlan policies or procedures is required to promptly report the violation to their immediate supervisor or the Compliance officer. False accusations made with the intent of harming or retaliating against another person can subject the accuser to disciplinary action.

### Financial Integrity

The integrity of information is essential for business operations. All records, information and accounts must be maintained accurately. Staff with responsibility for performing, updating, or maintaining financial data must adhere to institutional policies, industry, and regulatory accepted standards, as well as applicable state and federal laws. Staff may not make any false statements, misleading or artificial entries, or material omissions or misrepresentations in any of the company's financial records, documents, or communications. Any staff who wishes to report concerns related to the company's accounting practices, financial

reporting, or internal controls should contact the Compliance Officer at 315-338-4095. All reports will be treated confidentially to the extent reasonable and possible.

#### Conflict of Interest

Staff should avoid any activity that may create an actual or apparent conflict of interest with the company. Conflicts of interest occur when personal interests interfere with a staff's ability to exercise judgment objectively in the best interests of the company. Staff are expected to conduct business in the best interest of the company, regardless of personal preference. Staff must refrain from any activity or having any financial interest that is inconsistent with LIFEPlan's best interest and must refrain from activities, investments, or associations that compete with the company.

#### Non-Retaliation/Whistleblower Policy

LIFEPlan CCO NY encourages staff to make good faith disclosures of agency-related misconduct. Further, it prohibits retaliation against staff who report acts or suspected acts of fraud, waste, or violations or suspected violations of any Federal, State, regulatory requirement, or any Company policies including the Standards of Conduct, Code of Ethics, other wrongdoing or misconduct. Staff are encouraged to discuss concerns with their immediate supervisor or to report alleged non-compliance issues to any member of the LIFEPlan's management staff. Reports will be treated as confidential, to the extent permitted by law, and will be shared with others only on a need-to-know basis.

#### HIPAA

The Compliance Department ensures that our agency strictly adheres to the federal Health Insurance Portability and Accountability Act, also known as the HIPAA. Our privacy policies protect the confidentiality of health information for all the people we serve. You can find our Notice of Privacy Policy here: <https://lifeplanccony.com/privacy-policy/>

#### Compliance Hotline

LIFEPlan CCO NY has established a Compliance Hotline intended to provide a method of reporting any compliance concerns. Any concerns regarding improper or unethical activity such as violations of professional standards of practice or business ethics, breach of member privacy or confidentiality, information system security breach, inaccurate billing, or conflicts of interest should be reported. This list does not include all the possible violations that should be reported to the Compliance Department but provides examples of the different type of things that the Compliance Office would like to hear about. Information provided to the hotline is treated as confidential to the extent permitted by law. No one will retaliate against any person making a report in good faith. The Compliance hotline phone number 315-338-4095 is a dedicated voice mailbox accessible only by Compliance staff.

Director of Corporate Compliance:

Glenda Criss, 315-737-6113, [glenda.criss@lifeplanccony.com](mailto:glenda.criss@lifeplanccony.com)

Corporate Compliance Officer:

Lauren Albaroni, 315-876-9114, [lauren.albaroni@lifeplanccony.com](mailto:lauren.albaroni@lifeplanccony.com)