

Corporate Compliance Overview





What is Corporate Compliance?

Community Healthcare Network (CHN) is a not-for-profit organization that provides access to quality, culturally-competent and comprehensive community-based primary care, mental health, and social services for diverse populations in underserved communities throughout New York City.

CHN, its Board members, as well as its employees, contractors, agents, consultants, interns, volunteers, and others who act on CHN's behalf have a responsibility to CHN's patients, Federal and State Governments, other CHN funders and the communities served by CHN to conduct themselves prudently, responsibly, and in the best interests of CHN's stakeholders.

At CHN, our Corporate Compliance Program ensures that we are following all laws (City, State, and Federal), regulations, policies, and healthcare industry standards.

It's how we prevent, detect, and resolve any potential or actual violations of laws, rules, and Ethical Standards.

Corporate Compliance – Key Elements

1. Corporate Compliance Officer & Deputy Corporate Compliance Officer
2. Compliance Committee
3. Reporting & Contact information
4. Investigations
5. Disciplinary Actions





Corporate Compliance Officer & Deputy Corporate Compliance Officer

CHN's Corporate Compliance Officer and Deputy Corporate Compliance Officer are responsible for the development, implementation, oversight, and evaluation of all aspects of the Compliance Program. This includes responsibilities such as:

- Investigating, independently or with qualified legal counsel, and acting on any report or allegation of unethical or improper conduct or business practices, and implementing and monitoring appropriate corrective action and/or subsequent compliance
- Implementing corrective actions in response to findings of non-compliance
- Reporting information on the activities of the Corporate Compliance Program to CHN's CEO, Board of Directors, and Governance Committee

Corporate Compliance Committee

CHN's Corporate Compliance Committee is a multi-disciplinary group of staff that assist in the implementation and monitoring of the Corporate Compliance Program.

The Compliance Committee supports the Corporate Compliance Officer & Deputy Corporate Compliance Officer by:

- Identifying areas of risk
- Investigating compliance issues
- Offering recommendations for corrective action as applicable



Investigations:

CHN will conduct, under the direction of the Corporate Compliance Officer, investigations via a Special Investigations Unit (SIU) as defined by the Office of Medicaid Inspector General Summary of Regulation 18 NYRR Part 521 when there are suspected cases of potential fraud, waste, or abuse.

The Investigations may be coordinated with Office of Medicaid Inspector General or MFCU with respect to:

- Conducting fraud, waste and abuse investigations and fraud, waste, and abuse referrals;
- Preparing investigatory reports.
- Identifying overpayments.
- Investigation and remediating conflicts of interest.
- Participating in any meetings required by OMIG or MFCU.
- Terminating vendor contracts when fraud, waste or abuse is found or at the recommendation of the SIU.

Disciplinary Action:

All CHN contracts with vendors specify, in accordance with OMIG and NYRR, that contractors are subject to the required CHN compliance program, to the extent that such contractors are affected by the required CHN risk areas and only within the scope of the contracted authority and affected risk areas. Additionally, if a vendor is found to be out of compliance with CHN's required risk areas, vendor contracts may be terminated.



Corporate Compliance – Reporting & Contact Info



CHN is committed to conducting its business in a manner that complies fully with applicable laws, regulations, program requirements, and Standards of Conduct. In support of this commitment and to protect CHN's reputation, we require staff, partners, and vendors to report any suspicion of unethical or illegal conduct.

No retaliatory action shall be taken against any individual who, in good faith, reports suspected or known instances of non-compliance/ illegal conduct.

Individuals may choose to report anonymously by dialing (877) 767-7781

For questions, to report a potential violation, or other information related to CHN's Corporate Compliance Program, please email ccompliance@chnnyc.org.

- Corporate Compliance Officer, Alan Wengrofsky
- Deputy Corporate Compliance Officer, Michael Costello