



## CORPORATE COMPLIANCE PLAN

### INTRODUCTION:

We, the employees, directors, officers and others who comprise or have a relationship with HCWNY will act with integrity in all aspects of our work with persons with bleeding and clotting disorders.

The obligations set forth in the HCWNY Code of Conduct apply to our relationships with persons receiving services, their families, governmental authorities, vendors, consultants, third party payers, subcontractors, independent contractors, and one another.

We will provide high quality care to our patients while observing high standards of legal and ethical conduct. The Code of Conduct is based on our unifying principles and mission statement and serves as a foundation of our corporate compliance program. It applies equally to everyone. The policies set forth in the Code of Conduct are mandatory and must be followed by all of us.

HCWNY has been a not-for-profit organization since 1969. Our organization, licensed by the New York State Department of Health (NYSDOH), provides services for persons with bleeding and clotting disorders throughout eight (8) counties of Western New York.

### CODE OF CONDUCT

**Mission Statement:** The Hemophilia Center of Western New York (HCWNY) aims to be your **first** and **best** choice for health management of your bleeding or clotting disorder. We proudly specialize in diagnostic and clinical services, advocacy, education, community outreach and research initiatives.

HCWNY embraces and measures itself against the following principles which guide us in the work we do:

**Integrity:** Doing the right thing for the right reason, telling the truth, and providing a positive example of ethical and principle-based behavior.

**Respect:** Honoring diverse backgrounds and exhibiting a high level of regard, courtesy, and commitment to individuals' dignity and rights.

**Positive Relationships:** Building strong, healthy bonds with coworkers and encouraging responsible choice and self-determination in those we serve. We practice compassion,

enthusiasm, active listening, and clarity of information sharing, constructive problem solving, cooperative teamwork, and responsibility.

**Innovation:** Questioning the status quo, building on current success, and offering new ways to improve the system of services as well as ones performance.

**Learning:** Committing ourselves to continuous quality improvement of self and task outcomes, advancing understanding and applying skills effectively.

**Intent:** HCWNY's Code of Conduct (the Code) applies to all employees and independent contractors.

The Code of Conduct was approved by HCWNY's Board of Directors and is a formal statement of the Agency's commitment to the standards and rules of ethical conduct.

HCWNY is committed to preventing the occurrence of unethical or unlawful behavior, stopping such behavior as soon as possible upon discovery, and to discipline employees who violate the Code, including employees who neglect to report a violation.

All employees must comply with this Code, immediately report any alleged violations of wrongdoing, and assist management and compliance personnel in investigating allegations of wrongdoing. Employees reported suspected violations in good faith are protected from retaliation as "whistleblowers".

*While these standards addressed in the Code of Conduct are intended to guide employees in the course of their day-to-day responsibilities, they do not replace any agency or program policies and procedures. There may be instances they are not addressed by the Code of Conduct or existing policies and procedures, or activities that may conflict with these standards. Employees must seek direction from their supervisor, other agency administrative staff or the Compliance Officer in these instances.*

**Ethics:**

It is the policy of the HCWNY to observe all laws and regulations applicable to its business and to conduct business with the highest degree of integrity. To accomplish this all employees and contractors must obey the laws and regulations that govern their work and always act in the best interest of the people we serve, their families and the HTC. Please see the attached Appendix titled False Claims Act.

**Guidelines for employees and contractors:**

- Business Associate Agreement (B.A.A.) must be signed by all involved parties.
- You are expected to keep management informed of what you are doing; to document or record all services of transactions accurately; and to be honest and

forthcoming with the HTC regulatory agencies, and internal and external auditors.

- You are expected to comply with the HTC's policies and procedures, accounting rules and internal controls.
- You are expected to function with honesty in your work for the HTC and with people we serve, providers, suppliers, and all others with whom the HTC does business.

### **Maintenance of Records**

Employees and contractors must record and report all agency, consumer, and financial information fully, accurately, and honestly. Records include, but are not limited to records of the people we serve, documentation of services, accounting books or records, financial statements, timesheets or records, expense reports, vouchers, bills, payroll, claims payment records, correspondence and any other method of communication. Employees or contractors must not omit or conceal any relevant information.

### **Guidelines for employees and contractors:**

Many of the HTC's forms are legal documents used to prove that a service was provided, to bill for a service to a consumer, to record a job task, or to record specific happenings. You must document accurately and honestly, and only for those services that you provided or those events you were involved in.

### **Falsification of Records:**

- You must not make any false entries in any of the HTC's records or in any public record for any reason.
- You may not alter any permanent entries in the HTC's records.
- You may only approve payments or receipts on behalf of the HTC that are described in documents, where there is no accounting for receipts or expenditures on the HTC books, are strictly prohibited.
- You may not create or participate in the creation of any records that are intended to mislead or to conceal anything that is improper.

### **Expense Records:**

- You must always charge expenses accurately and to the appropriate cost center or account, regardless of the financial status of the program, project or contract, or the budget status of a particular account or line item.

### **Retention of Records:**

The retention, disposal or destruction of records of or pertaining to the HTC must always comply with legal and regulatory requirements and HTC policy.

- You must not destroy records pertaining to litigation or government investigations or audit with express written approval of the Compliance Officer.

### **Protection of Confidential Information:**

The HTC has developed policies and procedures to assure that the confidentiality of HTC information and information about the people we serve is protected and released with the appropriate authorization or for lawful reasons.

### **Guidelines for employees and contractors:**

You may not release confidential information without the proper authorization. Confidential information includes not only information about the people that we serve and their families, but also non-public information about the HTC that may be of use to the HTC's competitors or harmful to the HTC or its customers if released.

You must protect HTC information and avoid discussing or disclosing HTC information, purposefully or inadvertently (through casual conversation), to any unauthorized person inside or outside the HTC. Furthermore, staff may not share confidential HTC information with anyone except where required for a legitimate business purpose.

HTC information may not be removed from HTC property without permission from a supervisor or administrator with proper authority over the information. Ask your supervisor if you are not sure whether certain information is confidential.

### **Termination of Employment:**

- You may not use any confidential information gained from your employment with the HTC for your or another company's benefit. You may not take copies of any reports, documents or any other property belonging to the HTC.
- Upon termination of employment with the HTC, you must return all HTC property including, but not limited to, copies of documents, notes, and other records containing confidential information; computer disks, HTC ID, keys and credit cards.

### **Information Security:**

- You are responsible for properly using information stored and produced by all of the HTC's computer systems.
- Computers, internet access, email or other office communication systems are intended for business-related purposes only and not for uses that may be disruptive, offensive, harassing or harmful to others.

- Do not share your system user name or password with another person or allow another access to the computer with your password.
- All employees and contractors are required to comply with HTC's information technology policy and procedures. If you have any questions concerning information security, contact your immediate supervisor or Compliance officer.

### **Fair Dealing:**

Conducting business with providers, contractors, suppliers, people we serve, and competitors may pose ethical problems. Employees and contractors are expected to deal fairly with providers, contractors, people we serve, and competitors.

The Code of Conduct and the following guidelines are intended to help you make appropriate, responsible and correct decisions in these and all matters:

### **Kickback and Rebate:**

- Kickbacks and rebates in cash, credit or other forms are prohibited. They are not only unethical, but in many cases, illegal.

### **Gifts and Gratuities and Entertainment:**

- You may not solicit money, gifts, gratitude or any other personal benefits or favors of any kind from providers, contractors, accounts, or people we serve and their families.
- You must not offer or accept entertainment that is not a reasonable addition to a business relationship but is primarily intended to gain favor or to influence a business decision.

### **Agreements with Contractors and Vendors:**

The HTC must assure that any agreements with contractors and vendors clearly and accurately describe the services to be performed or items to be purchased. Performance standards, and the applicable compensation, if any, must be in reasonable amount, not be excessive in terms of industry practice and must equal the value of the services rendered.

### **Proper Use of Funds or Assets:**

Use of the HTC's funds or assets for any improper purpose is strictly prohibited. If you are aware of or have reason to believe that funds or assets are being improperly used, you must report this immediately to your supervisor or the Compliance Officer.

### **Federal and State Programs:**

HCWNY is committed to complying with the law and regulations that govern the federal and state programs that it administers. Policies and procedures, the Compliance Program, and this Code of Conduct are developed to provide guidance in your day-to-day work. You must abide by the policies and procedures and the standards set by the HTC.

### **Governmental Investigations:**

There may be times that the HTC is asked to cooperate with an investigation by a federal or state governmental agency, or to respond to a request for information. A request may be formally addressed to the HTC or an individual within the HTC. Employees and contractors must report any requests for information or cooperation with an investigation to the Compliance Officer immediately.

### **Political Activities and Contributions:**

Because the HTC is a non-profit organization, it is prohibited from engaging in any political campaign activities and a “substantial” amount of lobbying.

### **Guidelines for Employees and Contractors:**

HTC funds and resources, including your work time, may not be used for political contributions or activities.

You may not act as a representative of the HTC in any political campaign activity. In expressing your personal political views or support or opposition of a candidate for public office, it must be very clear that you are expressing your personal view, support or opposition as an individual and not a representative of the agency.

## **WORKPLACE PRACTICES**

### **General Statement:**

HCWNY is committed to hiring and retaining competent staff. All employees will be treated with respect, dignity and courtesy. HCWNY supports and encourages employees to develop their individual skills, talents, and understanding of their jobs. HCWNY is a work environment in which ethical and legal questions and concerns can be raised. If an employee raises an ethical or legal question or concern, the employee’s supervisor has the responsibility to address it. If he/she does not know how to respond, he/she should seek assistance through the supervisory structure, or the Corporate Compliance Officer.

HCWNY’s employees are advised of the existence of the Employee Assistance Program (EAP) that is available to all employees with medical, behavioral and social problems that are

affecting their job performance. Employees may self-refer or be mandated to participate in a consultation by their supervisor.

**Discrimination and Harassment:**

As an EQUAL OPPORTUNITY EMPLOYER, HCWNY does not deny opportunities or benefits on the basis of age, arrest record, color, conviction record (except as allowed by law), creed, disability (that does not prohibit performance of essential job functions), genetic predisposition to disease, marital status, national origin, political belief, race, religious affiliation, sex, sexual orientation, status or veteran status.

HCWNY intends to provide a work environment that is pleasant, healthful, comfortable and free from intimidation, hostility, or other offenses, which might interfere with work performance. Harassment of any sort – verbal, physical, visual – will not be tolerated.

What is Harassment? Harassment can take many forms. It may be, but is not limited to: words, signs, jokes, pranks, intimidation, physical contact or violence. Harassment is not necessarily sexual in nature.

Sexually harassing conduct may include unwelcome sexual advances, requests for sexual favors, or any other verbal or physical contact of a sexual nature that prevents an individual from effectively performing the duties of his or her position or creates an intimidating, hostile or offensive working environment, or when such conduct is made a condition of employment or compensation, either implicitly or explicitly. While it is not easy to define precisely what types of conduct could constitute sexual harassment, examples of prohibited behavior include obscene gestures, displaying sexually graphic magazines, calendars or posters, sending sexually explicit emails or voicemails and other verbal or physical conduct; or jokes or conversation about an employee's physical appearance, sex life, or other conduct pervasive to create an unprofessional or hostile work environment.

All HCWNY employees have a responsibility for keeping our work environment free of harassment. Any employee, who becomes aware of an incident of harassment, whether by witnessing the incident or being told of it, must report it to their immediate manager, or any management representative with whom they feel comfortable. If you are unsure with whom to raise an issue of harassment, or if you have not received a satisfactory response within five (5) business days after reporting an incident of what you perceive to be harassment, please contact Laurie Reger, Executive Director. When management becomes aware that harassment might exist, it is obligated by law to take prompt and appropriate action, whether or not the victim wants the company to do so.

Any incidents of harassment must be immediately reported to a manager or any other management representative. Appropriate investigation and disciplinary action will be taken. All reports will be promptly investigated with due regard for the privacy of everyone involved.

Any employee found to have harassed a fellow employee or subordinate will be subject to severe disciplinary action or possible discharge. HCWNY will also take any additional action necessary to appropriately remedy the situation. No adverse employment action will be taken for any employee making a good faith report of alleged harassment.

HCWNY accepts no liability for harassment of one employee by another employee. The individual who makes unwelcome advances, threatens or in any way harasses another employee is personally liable for such actions and their consequences. HCWNY will not provide legal, financial or any other assistance to an individual accused of harassment if a legal complaint is filed.

HCWNY is an equal opportunity employer and does not discriminate against employees or potential employees on the basis of color, race, religion, gender, ethnicity, sex, sexual orientation, age, marital status, genetic disposition, carrier status or disability.

HCWNY is committed to policies that promote fair employment and equal treatment in hiring, placement promotion, training, compensation, transfers, and leaves of absences, termination, layoff and disciplinary action. HCWNY will not tolerate physical or verbal harassment by directors, officers, administrators, employees, volunteers, vendors or subcontractors. Degrading or humiliating jokes, slurs, intimidation or other harassing conduct is not acceptable. Sexual harassment is illegal and is defined by law as unwelcome sexual advances, requests for sexual favors or other verbal or physical conduct that creates a hostile work environment.

Any form of sexual harassment is strictly prohibited. HCWNY shall not tolerate threatening, aggressive or abusive behavior, or will the HTC permit the possession or use of weapons or dangerous instruments or substances while on HTC property unless the appropriate HTC authority expressly permits possession.

HCWNY will not tolerate any act of retaliation or reprisal against an employee who in good faith reports a suspected or actual violation of law, regulation, standard, HTC policy or the Code of Conduct.

### **Seeking Guidance and Reporting Violations:**

#### **USING THE CORPORATE COMPLIANCE PROGRAM**

This compliance program does not replace other HTC reporting policies and procedures. Rather, it serves to underscore the importance of ethical and lawful behavior and to attend to professional conduct for which there are no formal reporting procedures or procedures that are merely implied.

The Executive Director of HCWNY shall have the ultimate authority and responsibility for the implementation of the HTC's corporate compliance program. The Executive Director and/or

designee shall have the authority and responsibility for compliance with laws and regulations and to report misconduct to the enforcement authority.

**Duty to Report:**

Employees must report to their supervisor or to the HTC Compliance Officer suspected violations by employees of applicable law, rules, regulations or the HTC Code of Conduct. Employees have the same reporting obligations for actual or suspected violations committed by a vendor or subcontractor of HCWNY.

**Where to Report:**

An effective corporate compliance program requires all of us to cooperate willingly and participate actively. We have a responsibility to report concerns to any of the following:

- Your department supervisor, or
- The Corporate Compliance Officer, or
- The Executive Director

Correspondence can be sent anonymously in a sealed envelope addressed to the Corporate Compliance Officer. Mailing can be done via US Postal Service, interoffice mail or personal submission into the Corporate Compliance Officer's mailbox.

There will be no reprisals against employees for good faith reporting of compliance concerns to their department supervisor, the Corporate Compliance Office or to the Executive Director.

**Internal Investigations and Corrective Action:**

HCWNY is committed to investigate all reported violations promptly and confidentially to the extent reasonably possible. The Corporate Compliance Officer will coordinate all of the aspects of the investigations. The Executive Director will coordinate investigations involving allegations of harassment, sexual or otherwise, employee grievances, suspected violations of ADA, FMLA and other discrimination. The Executive Director will keep the Corporate Compliance Officer apprised of the outcome of such investigations. All employees are expected to cooperate to the fullest extent possible with any and all investigations. All investigations will be reviewed by the Executive Committee of the Board of Directors. Once a compliance investigation has been completed, the reporting self-identified person will be given a brief summary of whether the allegations were substantiated and corrective action taken to the extent possible.

Corrective action plans will be shared with the HCWNY Board and Executive Director. It is the responsibility of the Executive Director to ensure corrective actions are carried out and report back to the Corporate Compliance Officer when the corrective action plan is completed.

The Corporate Compliance Officer will report to the Board of Directors annually.

### **Internal Monitoring and Auditing:**

The Corporate Compliance Committee will identify areas of compliance risk on an annual basis and develop a plan to conduct internal audits. The Corporate Compliance Officer is responsible for overseeing and monitoring audit activities.

### **Disciplinary Action:**

We recognize that we must act in accordance with the Code of Conduct, conform to its standards and supporting guidance, policies and procedures.

We are aware that failure to do so can result in serious consequences for individual employees as well as for HCWNY. Disciplinary actions, including termination, may be taken for:

- Violating Code of Conduct,
- Failing to report a violation of the Code of Conduct or to cooperate in an investigation,
- Retaliation against an individual who made a good faith report,
- Encouraging, directing, facilitating or permitting, either actively or passively, non-compliant behavior,
- Deliberately making a false report of a violation of the Code of Conduct.

All employees and contractors must cooperate fully and honestly in any investigation into a reported violation of this Code of Conduct, any applicable law or regulation, agency policy, procedure or practice or they will be subject to disciplinary action up to and including the possibility of employment termination.

### **Corrective Action and/or Discipline**

Any employee or contractor who violates or knowingly fails to report any violation of this Code of Conduct, any applicable law or regulation, HCWNY policy, procedure or practice is subject to appropriate disciplinary action, up to and including termination.

Disciplinary action may range from a warning to suspension or discharge, depending upon the nature of the incident and the relevant surrounding circumstances.

### **Your Responsibilities**

- ✓ Attend required training and read and understand HCWNY's Corporate Compliance Plan.
- ✓ Follow the HCWNY's Code of Conduct and abide by all policies and procedures, guidelines, and Federal and State laws and regulations.
- ✓ Be alert to any situation that could violate the HCWNY's Code of Conduct, policies and procedures, guidelines, and/or Federal and State laws and regulations.

- ✓ Promptly report any issues, concerns, violations or suspected violations to your supervisor, Compliance Officer or the Executive Director.

### **Supplemental Information**

The Code of Conduct does not address every situation. More specific guidance can be found in the HCWNY's Policies and Procedure Manual.

### **Compliance Program Structure**

The Corporate Compliance Officer reports directly to the Board President, the Executive Director and the Board of Directors. A standing Corporate Compliance Committee has been established. The Committee includes the Compliance Officer, HCWNY accountant, HIPPA Compliance Officer, Executive Director, a nursing representative and a lab representative.

## **BILLING**

### **Basis for Coding and Billing**

HCWNY will ensure billing is only for services that are deemed medically necessary by inclusion in the EMR. HCWNY will code service records completely and accurately using the required coding system and will ensure that the required documentation exists to support the services rendered and amounts billed. When additional information or documentation is necessary, we will review the service record and contact the appropriate individuals to obtain the required information and/or documentation as required prior to submitting a bill for payment.

HCWNY will ensure that billing to government and private payers conform to all pertinent Federal and State laws and regulations. We will operate oversight systems to verify that claims are submitted only for services actually provided and that services are billed as provided. HCWNY will ensure proper training for employees whose activities result in the submission of a claim for payment.

When an employee receives a question from a client or family member/representative or from a third party payer concerning a charge, they will promptly review and answer the question. HCWNY will notify payers of over-payment errors and will issue refunds promptly and accurately. HCWNY will keep documented records of all communication with payers.

Billing, cost reporting and consolidated fiscal reporting will be subject to internal and/or external audits to ensure that errors are corrected in a timely fashion.

## **CONFIDENTIALITY**

### **Patient Confidentiality**

All patient information is confidential. HCWNY is committed to maintaining confidentiality in strict accordance with legal and ethical standards and will actively protect and safeguard such information. Breaches of confidentiality will not be tolerated by HCWNY. HCWNY will respect the privacy of our patients.

Information about a patient may be disclosed only as authorized by the patient and/or his or her guardian/family and supported by a legitimate clinical or business purpose or as otherwise permitted by law.

All directors, officers, administrators, employees, volunteers and other affiliated staff of the HCWNY have a duty to protect the confidentiality of patient information that they may become aware of during the course of their work.

Information concerning patients and their medical record should not be discussed in a public area where others could overhear it. Records, whether paper or electronic, should be appropriately secured so that those not involved in legitimate activities relating to the patient shall not be permitted access to the record.

### **Confidential Information**

Confidential information can include, but not be limited to, patient information, employee data, financial data, payroll, benefits, personnel files, disciplinary matters, research data, statistical data, and other information that has been designated confidential. Such information shall be processed, used, copied, read or disclosed only as necessary to perform the job responsibilities and then only to the extent necessary and as expressly authorized by HCWNY.

Confidential information will not be used for any direct or indirect personal gain or other improper purpose.

### **Impairment and Substance Abuse**

HCWNY is committed to achieving a drug-free workforce and to providing a workplace that is free from the use of alcohol and other drugs. HCWNY purpose in doing this is to provide a safe and healthful workplace, to comply with contractual obligations and Federal laws, to assure quality work, to protect the community, the people the agency serves, and HCWNY's property and reputation.

Alcohol and use of other drugs on the job is not permitted. This includes the abuse of prescription drugs.

Employees will be subject to disciplinary action, up to and including termination, for the following: possessing, transferring, using or selling illegal drugs or controlled substances; consuming alcohol during work hours; reporting to work under the influence of alcohol consumed before the start of his or her work day; and abusing drugs prescribed by a physician. If an employee must take prescribed drugs while at work which may, in any way, impede his or her ability to drive or otherwise perform his or her job duties, this must be brought to the attention of his or her supervisor before the start of the shift.

If an employee approaches his or her supervisor regarding a substance abuse problem, the employee will be referred to the EAP or other appropriate resource for treatment. The employee must make this request before a problem has been identified by his or her supervisor or other member of the HCWNY management to avoid disciplinary action. Also, the employee must continue to abide by the requirements of this treatment as well as remain free of any further abuse. The employee may be required to take an unpaid leave of absence until it has been determined that he or she is substance free.

HCWNY employees are responsible for:

1. reporting to work free of alcohol or other drugs and their effects at all times,
2. participating in and supporting HCWNY sponsored drug and alcohol education and
3. seeking and accepting assistance for alcohol and other drug abuse related problems before job performance is affected.

### **Personal Use of HCWNY's Resources**

Employees are to use HCWNY resources in a manner consistent with achieving HCWNY business in a cost-effective manner. These resources include, but are not limited to: (1) computers, printers and other information technology; (2) copiers; (3) telephones and voicemail; (4) e-mail and internet access; (5) office supplies; and (6) cash and HCWNY credit cards. Personal use of HCWNY resources is disallowed.

## **CONFLICT OF INTEREST**

### **General Statement**

Members of the Board of Directors, officers and employees must not use their positions to their personal advantage. A conflict of interest may occur if your outside activities or personal interests influence or appear to influence your ability to make objective decisions in the course of your job responsibilities. All directors, officers, administrators and employees must disclose any existing or new relationships that may give the appearance of a conflict of interest to the Corporate Compliance Officer.

Although it is impossible to list every circumstance giving rise to a potential conflict of interest, the following will serve as a guide to the types of activities that may cause conflicts and should be fully reported to HCWNY:

- to hold direct or indirect material financial interest in any outside concern from which the agency secures good or services,
- to compete directly or indirectly with the agency in the purchase or sale of property or property rights, interests or other services,
- to solicit or accept for personal use cash, gifts, entertainment or services from vendors, contractors, visitors, clients or families of clients, (This does not include acceptance of items of nominal or minor value that are clearly tokens of respect and not related to any particular transaction or activity of the agency.)
- to disclose or use information relating to the agency for personal profit or advantage to one's immediate family.

### **Procedures to Handle Conflicts of Interest**

Members of the Board of Directors, officers, administrators and employees have a duty to disclose any actual or possible conflicts of interest to the Corporate Compliance Officer for review by the Corporate Compliance Committee. This committee will, after review, determine whether a conflict exists and shall investigate alternatives. The corporate compliance committee, whose members include non-board members, will forward its recommendations to the Board of Directors for disposition.

Members of the Board of Directors shall complete a written Conflict of Interest Statement (1) within 60 days of appointment/employment and (2) annually, no later than 1/31 of each calendar year.

The Corporate Compliance Officer shall ensure this process is implemented and provide an annual report to the Board of Directors (at the second Board of Directors meeting in any calendar year) documenting compliance.

## **REGULATIONS**

### **Licensure and Certifications**

HCWNY will not allow any employee or independent contractor who is required to be licensed or credentialed to work at HCWNY without valid, current licensure or credentials. It is the responsibility of such individuals to maintain licensure or credentials and to provide HCWNY with documentation.

All employees are expected to conform to standards of their profession and exercise appropriate judgment in the performance of their duties.

### **Exclusionary Audits**

The Corporate Compliance Officer will ensure employees and contractors are screened to verify they remain eligible to participate in Medicaid reimbursed programs. Initial screening will be done at hire or first contract and no less than annually thereafter.

### **Tax-Exempt Requirements**

HCWNY is a tax-exempt entity. In order to comply with the applicable law, HCWNY must operate for the benefit of the community and must avoid that which the tax law refers to as “private inurement” and “private benefit.” Violation of the tax law can give rise to criminal penalties.

HCWNY tax-exemption may be used only for legitimate HCWNY purchases. Personal items may not be purchased using HCWNY’s tax-exempt privileges.

### **Environmental Health and Safety Requirements**

HCWNY staff that handle hazardous materials and regulated medical waste must comply with environmental laws and regulations and follow environmental safety procedures explained in the HCWNY’s Policies and Procedures Manual. HCWNY must hire only licensed services to transport and dispose of hazardous and polluted materials and regulated medical waste, any action to the contrary must be reported to the Corporate Compliance Officer or Executive Director.

### **Proper Control of Medication**

HCWNY is responsible for the proper storage, handling and administration of pharmaceutical products as explained in the HCWNY’s Policies and Procedures Manual.

The diversion of any prescription drug or controlled substance in any amount for any reason to an unauthorized individual or entity is forbidden and may constitute grounds for dismissal. HCWNY staff must be diligent in carrying out their obligations in this regard and they must never use drugs stored in various HCWNY programs for their own purposes.

## **Government Investigations**

HCWNY responds in a proper manner to all government investigations. Some of the governmental entities that have a right to immediate access to information are:

- New York State Office of the Attorney General
- New York State Department of Health
- New York State Fraud Control Unit
- New York State Department of Labor
- New York State Office of the Medicaid Inspector General
- United States Department of Health and Human Services (HHS)
- United States Occupational Safety and Health Administration (OSHA)
- Health Care Financing Administration, a division of HHS
- United States Office of the Inspector General

## **Procedure to receive government investigators:**

- Examine the officer's credentials before granting them access to HCWNY facility.
- Treat the government officers with respect, courtesy and cooperation.
- Invite the officials to delay their duties until the Executive Director, and/or the Corporate Compliance Officer is called and responds to the officials' arrival and purpose.