



## Corporate Compliance

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### **Code of Conduct**

The Code of Conduct sets forth the basic principles that guide North East Westchester Special Recreation, Inc. (North East) decisions and actions. All Board Members, Officers, employees and contractors are expected to familiarize themselves with the Code of Conduct and should rely on the standards contained in the Code in carrying out their duties.

When you read and sign the acknowledgement for the North East's Code of Conduct, as a condition of your employment, you are saying that you understand it and agree to work according to the values stated in it.

### **Why does North East have a Compliance Program and what is it?**

North East has a Compliance Program because it is required by the New York State Office of Medicaid

The Compliance Program is North East's promise to live by all of the laws, rules and regulations of both the federal, state and local government having to do with how we get paid for the services we provide. Some of these services are paid for by the New York State Medicaid Program. If we ever violate any of these laws, it is considered a criminal act and can be punished by both fines and imprisonment. These laws apply not only to those people who send the bills, but also those who record services that are provided. At North East we have an attendance sheet for all of our programs and that attendance sheet will be signed by two people, one a supervisor and the other a staff person. Both people who sign are saying that all of the people on the list participated in a North East Program on the day and date listed on the attendance sheet.

Fraud and Abuse in Medicaid is taking money from the tax payers of NYS that we are not entitled to have.

### **What does this mean to me?**

When you sign for the Code of Conduct you are also promising to obey all of the laws, rules and regulations and at North East that means that as staff workers you are saying that everything you sign is true and if you submit bills for these services you are saying that you have a process in place to verify that services you are billing for were actually provided.

### **What if I think something is being done that violates these laws?**

Violations of the laws that cover billing to Medicaid are called fraud and abuse. Fraud and abuse are when someone deliberately does something illegal for their own benefit or the benefit of the organization they work for. An example would be deliberately billing Medicaid for consumers who did not actually attend a program and collecting that extra money. Accidents happen and can be fixed but fraud is deliberate.

If you know that Fraud and Abuse have occurred you are required by law to report it. If you do not report it you could also be guilty of violating the law. If you make a report you know is false, you are also guilty of a crime and may be fined and prosecuted.

### **What do I do if I know or suspect that someone at North East is breaking the law?**

If you know or suspect that someone at North East is deliberately breaking the laws of billing Medicaid for services, you need to report it as soon as possible. You can report it to your supervisor, the Executive Director or the Compliance Officer. You can reach the Compliance Officer by calling (914) 230-4656. You do not have to give your name to the Compliance Officer, but it is helpful so they can get back to you if they need more information.

### **What is the Compliance Officer?**

The Compliance Officer is someone who works for North East and reports to the Executive Director and the Board of Directors. Their job is not only to protect North East, but also protect anyone who reports fraud or abuse.

### **How am I protected by the Compliance Officer?**

Because we and the government want people to report Fraud and Abuse, North East has what is called a **Whistle Blowers Policy** and this policy protects people who report Fraud and Abuse from being punished for doing the right thing. This policy says you cannot lose your job for reporting something and you cannot be punished or picked on for reporting something you believe is wrong and if we cannot protect you at work we will work with you to make it right.

The bottom line about the North East Compliance Program is **If you think something wrong may be going on report it right away!**