

## REPORTING REQUIREMENTS

All Affected Individuals must abide by the Compliance and Ethics Program and are required to report suspected misconduct or possible violations of the Program to the Compliance Officer, another member of senior management, or to their supervisor.<sup>1</sup> Affected Individuals may also report issues to the Compliance Hotline or Compliance Drop Box.

Disclosure is required if any Affected Individuals have knowledge of any potential violations of criminal, civil or administrative law related to the Federal health care programs. Affected Individuals are also required to raise any compliance issues or questions about Allegria's Program, policies, conduct, practice or procedures.

**Affected Individuals may report anonymously if they so choose.** To report anonymously, please use the Hotline.

**Affected Individuals may make reports confidentially.** The identity of reporting individuals will be kept confidential, whether requested or not, unless the matter is subject to a disciplinary proceeding, referred to or under investigation by the New York State Medicaid Fraud Control Unit (MFCU), the Office of the Medicaid Inspector General (OMIG) or law enforcement or if disclosure is a requirement in a legal proceeding.

**Retaliation or intimidation in any form against an individual who in good faith reports possible unethical or illegal conduct is strictly prohibited.** Acts of retaliation or intimidation should be immediately reported to the Compliance Officer or to the Hotline or Drop Box and, if substantiated, the individuals responsible will be appropriately disciplined.

Name	Contact Information
<u>Compliance Officer</u> Courtney Coudrey, LPN	Ph: (631) 473-7100 Ext. 1154 Email: CCoudrey@allegriarehab.com
<u>Compliance Hotline</u>	Ph: (929) 717-0077
<u>Compliance Drop Box</u>	Outside of the Social Work Office

<sup>1</sup> Supervisors and/or other members of Allegria's management must immediately inform the Compliance Officer of any compliance-related reports that they receive.

## Introduction

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Allegria Nursing and Rehabilitation Center of Port Jefferson ("Allegria" or the "Facility") is dedicated and committed to conducting its business in compliance with all applicable federal and state laws, rules, and regulations, including Federal health care program requirements (e.g., the Medicare and Medicaid programs).

Everyone associated with Allegria is expected to continue to adhere to the high standards of honesty whenever he or she acts on behalf of Allegria, whether in interactions with other employees, with residents or patients and their families, with vendors, with government regulators or with the general public.

In accordance with these requirements, Allegria has designed and implemented a comprehensive Compliance and Ethics Program the ("Program") that sets forth the standards of conduct that all "Affected Individuals" (as defined below) are expected to follow in their employment or course of dealings with Allegria. The principal components of the Compliance and Ethics Program include:

(A) **Compliance and Ethics Program Code of Conduct.** The Code of Conduct sets forth Allegria's mission and the general standards of conduct that all Affected Individuals are expected to follow.

(B) **Compliance and Ethics Program Structure and Guidelines.** The Structure and Guidelines describe the elements of the Program and how the Program operates day-to-day.

(C) **Compliance Policies and Procedures.** Certain compliance issues require further detail and instruction. Affected Individuals are required to review and be familiar with the requirements outlined in this Manual and any of our Program policies and procedures that relate to your responsibilities at Allegria. The Compliance Policies and Procedures may be accessed in hard copies which are maintained at the Front Desk and are available on each unit. They are also available upon request to the Compliance Officer at any time.

(D) **Compliance Training.** Allegria has established a compliance and education program for Affected Individuals. Annual participation in compliance training is mandatory.

Allegria is dedicated to ensuring a culture of compliance and quality. As such, we require that all Affected Individuals cooperate fully with the requirements of the Compliance Program. Once you have reviewed this document, please sign and return the attached Acknowledgement of Receipt to the Compliance Officer.

If you have any questions regarding Allegria's Compliance and Ethics Program, please speak with the Compliance Officer.

Thank you for your continued commitment to Allegria.

Sincerely,



Melissa Modica, RN, Administrator

## Key Definitions

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- (1) ***"Affected Individuals"*** means all persons who are affected by Allegria's compliance risk areas, including employees; the Administrator and senior managers; contractors, agents, subcontractors, and independent contractors ("Contractors"); the Governing Body and corporate officers. Contractors are only subject to the Compliance and Ethics Program to the extent it is related to their contracted role and responsibilities within Allegria's identified risk areas.
- (2) ***"Compliance Committee"*** means the group or senior managers that Allegria has designated to coordinate with and the Compliance Officer in overseeing and carrying out certain aspects of the Compliance and Ethics Program.
- (3) ***"Compliance Officer"*** means the individual designated by Allegria with oversight responsibility of the Compliance and Ethics Program.
- (4) ***"Compliance Program"*** or ***"the Program"*** means the comprehensive program and organization policies and procedures implemented by Allegria which together, set forth the standards of conduct that all Affected Individuals are expected to follow in their employment or course of dealings with Allegria.
- (5) ***"Federal health care program"*** means any plan or program that provides health benefits whether directly, through insurance or otherwise, which is funded directly, in whole or in part, by the United States Government, and includes certain State health care programs. Examples include, but are not limited to: Medicare, Medicaid, Veterans' programs and the State Children's Health Insurance Programs.
- (6) ***"Good faith participation in the Compliance Program"*** includes, but is not limited to the following:
  - Reporting actual or potential compliance issues to appropriate personnel (e.g., the Compliance Officer);
  - Cooperating with/participating in the investigation of potential compliance issues;
  - Assisting Allegria with self-evaluations and audits;
  - Assisting Allegria with implementing remedial actions;
  - Reporting instances of intimidation or retaliation; and
  - Reporting potential fraud, waste or abuse to appropriate state or federal entities.
- (7) ***"Governing Body"*** refers to the owners of the Facility.
- (8) ***"Organizational experience"*** means the:
  - knowledge, skill, practice and understanding Allegria has in operating the Compliance Program;
  - identification of any issues or risk areas in the course of internal monitoring and auditing activities;

- experience, knowledge, skill, practice and understanding of Allegría's participation in Federal health care programs (e.g., the Medicare and Medicaid programs) and the results of any audits, investigations, or reviews; or
- awareness of any issues Allegría should have reasonably become aware of for the categories of service we provide.

(9) ***"Risk Areas."*** Compliance "risk areas" may change from time-to-time based on Allegría's organizational experience. However, the Program continually addresses the following risk areas:

- Billings and payments;
- Ordered services;
- Medical necessity;
- Quality of care;
- Governance;
- Mandatory reporting;
- Credentialing; and
- Contractor oversight.