


Policy Title:	Whistleblower: Compliance Reporting
Policy Number:	100-09
Effective Date:	8/1/2019
Revised Date(s):	1/11/2022
Regulation Reference (if applicable):	Federal False Claims Act (31USC §§ 3729-3733); New York False Claims Act (State Finance Law, Article 13), (State Finance Law §191); New York Labor Law, Section 740 & 741; Social Services Law, Section 145, 145-b, & 145-c; Social Services Law, Section 366-b; Penal Law Article 175, 176, & 177;
Reviewed/Approved By:	
 2/15/22	
Michael Rulffes, Executive Director Date	

I. Policy

Consistent with the Practice's Code of Conduct and this policy, Crouse Medical Practice (CMP) requires all employees (including former employees), independent contractors, board members, officers, management, and volunteers to observe the highest ethical and business standards. These individuals also referred to collectively as "Staff" in this policy, shall practice honesty and integrity while complying with all applicable federal, state and local laws as well as CMP's internal policies and procedures. If any individual is aware of a violation or a suspected violation, they should bring the problem to the attention of the Compliance Officer, their immediate supervisor and/or any methods listed under the procedure section of this policy.

All Staff are required to report any activity involving or concerning CMP that appears to violate the Compliance Program, Code of Conduct or any CMP policy/procedure, as well as applicable laws, rules, or regulations. Such reports may be made to the Compliance Officer in person/phone/e-mail, through the Corporate Compliance Hotline, the Compliance reporting form on CMP's website, through their immediate supervisor/manager, or any other form of written communication. Reports will be treated as confidential to the extent reasonably possible. There shall be no retaliation for good faith and/or reasonable belief reporting of actual or suspected compliance problems.

Failure to report may, by itself, be a violation of the CMP's Compliance Program, which may subject the person to discipline up to and including termination of employment or affiliation with CMP.

II. Procedure

A. General Requirements

- i. The Practice shall publicize the compliance hotline number and anonymous reporting form to

employees and affiliates during new employee orientation, Board orientation and periodically through other Practice publications.

- ii. Concerns or reports of suspected or actual violations may be made to CMP in a number of ways:
 1. Orally or in writing to the staff member's supervisor/manager;
 2. Calling the Compliance Officer at (315/470-8821), scheduling an in-person meeting, or e-mailing the Compliance Officer.
 3. The anonymous compliance hotline (315/479-5070, ext. 66107).
 4. Via the online reporting form on: <https://crousemed.com/compliance>

B. How the report will be handled

- i. Every effort will be made to treat the reporting individual's identity with the appropriate level of confidentiality. If the individual wishes to remain anonymous, his/her complaint will be treated with the same level of care and attention as any other issue brought to the organization. The anonymous reporting party should be aware that it will be difficult for the Practice to provide feedback.
- ii. No individual, who reports a violation in good faith and/or based on reasonable belief, shall suffer harassment, retaliation, nor will he/she suffer any unfavorable consequences (see the Corporate Compliance Non-Intimidation/Non-Retaliation Policy).
- iii. Reporting parties shall provide detailed and accurate information. Any reporting parties wishing or agreeing to be contacted must provide the appropriate contact information.
- iv. Reports will be responded to according to the nature and extent of the potential non-compliance, rather than on a first-come, first-served basis. Reports will be investigated by the Compliance Officer with the assistance of applicable staff, as necessary.
- v. The Compliance Officer, or his/her designee, shall document compliance reports and concerns in the Compliance Reporting Log.
- vi. Outside auditors and/or counsel will be sought to provide objectivity or legal advice, if necessary.
- vii. Crouse may have an obligation to self-report to applicable federal and state agencies depending on the nature of the report and/or suspected violations.

C. Reports to the Board of Directors

The Compliance Officer is charged with oversight of this policy and will report as deemed appropriate to the Board on issues that may arise hereunder.