

**WARREN COUNTY HEALTH SERVICES DEPARTMENT POLICY REGARDING  
CORPORATE COMPLIANCE AND FALSE CLAIMS, FRAUD PREVENTION  
AND DETECTION**

**1. GENERAL STATEMENT OF POLICY**

- 1.1 It is the policy of Warren County Health Services hereinafter referred to as “the Department”, to comply with all applicable federal, state and local laws and regulations.
- 1.2 It is also the policy of the Department to require staff to comply with provisions of the Warren County Code of Ethics, the Department Compliance program, as well as any other applicable protocols, standards and procedures established or adopted by the County and /or the Department.
- 1.3 This policy summarizes the provisions of the Department’s Compliance Program and requirements of the Federal Deficit Reduction Act of 2005, and provides information to Department staff about important federal and state laws. The provisions, standards and requirements of the program will be reviewed with each new employee and provided to all employees.

**2. SCOPE**

- 2.1 This policy applies to all employees and contractors in the Department providing Medicaid health care items or services for which Medicaid payments are made.
- 2.2 This policy also applies to all contractors and agents who furnish or authorize the furnishing of Medicaid services on behalf of the Department, or perform billing or coding functions or are involved in monitoring the care provided by the Department, hereinafter referred to as “agent”.

**3. ADMINISTRATION**

- 3.1 This policy will be implemented by the Director of Public Health/Patient Services. The designated Department Compliance program officers will be the Assistant Director of Public Health and the Assistant Director of Patient Services.

**4. POLICY/PROCEDURE**

- 4.1 Each employee or agent of the County will strive to act in accordance with the provisions of any applicable federal, state and local laws, the Code of Ethics and the Department Compliance Program, and will encourage other employees or agents to act the same.
- 4.2 No employee or agent of the County has authority to act contrary to the provisions of any applicable laws, Code of Ethics, or the Department Compliance Program or to authorize, direct or condone such action by any other employee or agent.

- 4.3 Any employee or agent of the Department who has knowledge of activities that he or she believes may violate a law, rule or regulation has an obligation, promptly after learning of such activities, to report the matter to his or her immediate supervisor. Reports may be made anonymously and employees will not be penalized for reports made in good faith. Failure to report known violations, failure to detect violations due to negligence or reckless conduct and intentionally making false reports shall be grounds for disciplinary action. The appropriate form of discipline will be case-specific, and in accordance with NYS Civil Service Law and/or existing collective bargaining agreements.
- 4.4 The Department will take steps to communicate its standards and procedures to all employees and agents by disseminating information that explains in a practical manner what is required. This will include distribution of this policy.
- 4.5 The Department will take steps to achieve compliance with its standards by utilizing monitoring and auditing systems reasonably designed to detect misconduct by its employees and agents and by having in place and publicizing a reporting system whereby employees and other agents can report misconduct within the Department without fear of retribution.
- 4.6 After a suspected violation has been reported, the Department, will take reasonable steps to respond appropriately and to prevent further similar violations, including any necessary modifications to its program to prevent and detect violations of law.
- 4.7 All members of the Department workforce should be knowledgeable about several important federal and state laws that help to prevent and detect waste, fraud and abuse in federal health care programs such as Medicare and Medicaid. In addition, individuals who, in good faith, report suspected non-complaint behavior are protected by both federal and state law. Summaries of these laws will be distributed during in-service training.
- 4.8 This policy is intended to communicate current policies regarding compliance.
- 4.9 All contractors and agents who furnish or authorize the furnishing of Medicaid services on behalf of the Department, or perform billing or coding functions or are involved in monitoring the care provided by the Department are required to communicate these policies and procedures to their employees and are responsible for making sure that the communication occurs.

## **5. DISTRIBUTION**

- 5.1 This Policy and Procedure will be distributed to Department employees via the Warren County Health Services web page and in-service training. In addition, hard copies will be provided to new employees during the orientation process and current employees during in-service training.