

Warren County Board of Supervisors

RESOLUTION NO. 50 OF 2019

RESOLUTION INTRODUCED BY SUPERVISORS FRASIER, MCDEVITT, BRAYMER, LEGGETT, LOEB, DRISCOLL, HYDE, MAGOWAN AND SOKOL

AMENDING RESOLUTION NO. 242 OF 2018, ADOPTING THE WARREN COUNTY CORPORATE COMPLIANCE POLICY, TO APPROVE AMENDMENTS TO THE POLICY

WHEREAS, pursuant to Resolution No. 803 of 2010, the Warren County Board of Supervisors adopted the Warren County Corporate Compliance Policy as required by federal and state agencies responsible for enforcement of Medicare and Medicaid laws and regulations applicable to health care providers, and

WHEREAS, pursuant to Resolution No. 242 of 2018, the policy was amended to name the Human Resources Director as the County's Corporate Compliance Officer, and

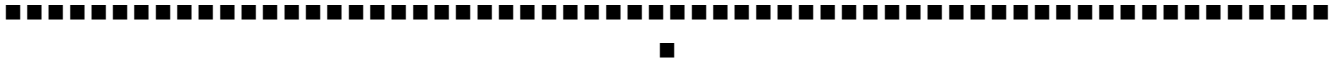
WHEREAS, the County Administrator has requested that the policy be amended to name the Assistant to the County Administrator as the County's Corporate Compliance Officer, now, therefore be it

RESOLVED, that the Warren County Corporate Compliance Policy, previously adopted by Resolution No. 803 of 2010, and amended by Resolution No. 242 of 2018, be, and hereby is amended to name the Assistant to the County Administrator as the County's Corporate Compliance Officer, and be it further

RESOLVED, that the updated Warren County Corporate Compliance Policy annexed hereto as Schedule "A" be, and hereby is, adopted by the Warren County Board of Supervisors.

SCHEDULE "A"

WARREN COUNTY
CORPORATE COMPLIANCE
STATEMENT OF POLICY:



Warren County is committed to providing quality health care in compliance with all applicable laws, rules, regulations and other directives of federal, state and local governments and agencies.

Warren County recognizes that the federal and state agencies responsible for enforcement of Medicare and Medicaid laws and regulations applicable to healthcare providers have required the development and implementation of formal compliance programs by health service providers.

Compliance programs which are consistent with federal and state laws and regulations are designed to promote the highest level of ethical and lawful conduct throughout the County government to combat health care fraud and abuse.

Warren County is committed to the prevention and detection of any fraud, waste and abuse related to Federal and State health care programs (Medicaid, Medicare and other governmental payer programs), and the protection of any "whistle blower".

This policy is not intended to replace other compliance practices, rules or procedures defined elsewhere in any County or departmental policies and procedures, standard operating procedures manuals, standard operating procedures, local laws, etc.

SCOPE:

This policy applies to all Warren County employees, contractors, medical staff, volunteers and vendors.

PROCEDURE:

1. WRITTEN POLICIES, PROCEDURES AND STANDARDS OF CONDUCT:

It is the policy of Warren County to require employees to comply with provisions of the Warren County Code of Ethics, their department compliance program, as well as any other applicable protocols, standards, policies and procedures established or adopted by the County or department.

County departments will develop and distribute written standards of conduct as well as clinical, financial and administrative polices on the provision of service by which all employees are expected to comply. The standard of conduct is for the employee to follow all department specific policies and procedures while performing their job duties.

Divisions and departments will develop policies and procedures addressing the non-employment or retention of excluded individuals or entities and the enforcement of appropriate disciplinary action against employees

or contractors who have violated corporation compliance policies and procedures, applicable statutes, regulations, federal, state or private payor healthcare requirements.

The County prohibits the knowing submission of a false claim for payment in relation to a Federal or State funded health care program. The County encourages any employee who is aware of or reasonably suspects the preparation or submission of a false claim or report or any other potential fraud, waste, or abuse related to a Federally or State funded health care program to report such information to his or her supervisor, department compliance officer or to the County's Compliance Officer. Any employee who reports such information will have the right and opportunity to do so anonymously and will be protected against retaliation for making the report. The County commits itself to swiftly and thoroughly investigate any reasonably credible report of fraud, waste or abuse or any reasonable suspicion thereof through the County compliance program. The County retains the right to take appropriate action against an employee or vendor who has participated in a violation of any applicable law or this Policy.

2. COMPLIANCE OFFICER AND COMPLIANCE COMMITTEE:

Warren County's Corporate Compliance Officer is designated as the Warren County Assistant to the County Administrator ("County Compliance Officer"). The County Compliance Officer will serve as the focal point for compliance activities and be responsible for oversight of the development, implementation and operation of the compliance program policies and procedures. The County Compliance Officer will report quarterly to the County Administrator and report annually to the Board of Supervisors.

There shall be established a County Compliance Committee, whose membership will consist of the County Compliance Officer as Chairman, and department compliance officers as members. The Committee will meet quarterly to review and update issues, protocols and ongoing compliance program requirements.

Department heads will designate a department compliance officer to ensure compliance with department specific policies. Compliance issues detected will be brought to the attention of the department compliance officer. Department compliance officers will also work cooperatively with the County Compliance Officer in meeting compliance obligations, requirements and responsibilities.

3. TRAINING AND EDUCATION:

All employees will be oriented on the first day of employment in accordance with County and Department Policies and Procedures.

During the orientation process new employees will be oriented to the department specific policies and procedures. On an annual basis the departments will train employees on corporate compliance department policies and procedures.

Each department will adopt a process whereby employees will certify that they have received, read and will abide by department specific corporate compliance policies and procedures at orientation, annually and as revised and/or amended.

4. EFFECTIVE LINES OF COMMUNICATION:

Each department's Compliance Officer will adhere to an open door policy and encourage employees to

discuss any issues in regards to abuse and fraud. Employees are assured of non-retaliation and confidentiality.

5. ENFORCEMENT THROUGH DISCIPLINE:

Failure to adhere to compliance standards and department policies will result in disciplinary action up to and including termination.

6. CONDUCTING INTERNAL MONITORING AND AUDITING TO PREVENT FRAUDULENT ACTIVITIES:

Each department will develop internal monitoring and auditing systems to reduce fraud, waste and abuse, enhance operational functions, improve the quality of health care services and decrease costs. The department and/or County will thoroughly and thoughtfully investigate in a timely and appropriate manner compliance issues that are brought to their attention. Response and corrective action to any findings will be prompt and thorough.

Reports may be anonymous and confidentiality will be maintained.

To report a suspected issue of fraud or abuse the employee may report verbally, by phone or in person to the Department Compliance Officer or to the County Compliance Officer.

After completion of any investigation, the department compliance officers and County Compliance Officer will report applicable findings to the Personnel Officer, County Administrator or law enforcement officer. Following investigation of complaints, disciplinary action will be in accordance with any applicable collective bargaining agreements and/or Civil Service Law Section 75.