

Subject:	Designation and Responsibilities of the SI-PPS Compliance Officer
Endorsed By:	Compliance Committee
Approved By:	Compliance Committee, Board of Managers
DSRIP Implementation Deadline:	April 2015
Effective Date:	October 2015
Supersedes:	April 2015
Purpose:	This policy sets forth the designation and responsibilities of the SI-PPS Compliance Officer.
Policy:	<p>It is the policy of Staten Island Performing Provider System, LLC (“SI-PPS”) under the Delivery System Reform Incentive Payment (“DSRIP”) program to ensure it conducts its business in compliance with all applicable laws, rules, regulations and other directives of the federal, State, and local governments, departments and agencies.</p> <p>SI-PPS shall at all times have an individual designated by the Board of Managers as the SI PPS Compliance Officer to run the day-to-day operations of the Compliance Program, to serve as the focal point for compliance activities, be responsible for coordinating and overseeing all aspects of the Compliance Program, and make regular reports to the Board of Managers and the Compliance Committee. The SI-PPS Compliance Officer shall be an individual who does not serve as legal counsel to SI-PPS, is not subordinate to the general counsel or Chief Financial Officer, and does not act in any financial function for SI-PPS. The Board of Managers shall re-appoint an individual to act as the SI-PPS Compliance Officer as necessary. In addition, the SI-PPS Compliance Officer shall be an employee of SI-PPS and will closely coordinate</p>

	<p>compliance functions with the Participating Provider Compliance Officer/contacts.</p> <p>The SI-PPS Compliance Officer shall be assisted, as needed, by legal counsel, the Compliance Committee, the Board of Managers, and designees selected by the SI-PPS Compliance Officer. The SI-PPS Compliance Officer shall receive and respond to all complaints, reports and questions regarding compliance issues and have the authority to review all documents and other information relevant to compliance activities. The SI-PPS Compliance Officer shall have the duty to be actively involved in conducting and responding to appropriate compliance assurance reviews and audits, as well as ensuring that each component of the Compliance Program is fully operational and that all necessary remedial action is taken when necessary.</p>
Procedure:	<ol style="list-style-type: none">1. The Board of Managers shall designate an individual to serve as the SI-PPS Compliance Officer for the term of such individual's employment or until the Board of Managers, in its sole discretion, appoints another SI-PPS Compliance Officer. Notification of any change in designation of the SI- PPS Compliance Officer will be made to all PPS Associates.2. The SI-PPS Compliance Officer shall:<ul style="list-style-type: none">• Be an individual who acts in an administrative role for SI-PPS, and is responsible for the development of the Compliance Program;• Have direct access to the Board of Managers and legal counsel and shall have the authority to review all documents and other information relevant to compliance activities, including but not limited to, patient records, billing records, marketing records and records concerning relationships with third parties, suppliers, vendors, and independent contractors;• Review contracts and obligations that may contain payment provisions that could violate statutory or regulatory requirements related to compliance and the DSRIP Program, and seek the advice of legal counsel when necessary;

- Receive copies of the results of all internal audit reports and work closely with key administration to identify aberrant trends;
- Coordinate internal and external compliance review and monitoring activities, including annual or periodic audits, and oversee any resulting corrective action;
- Monitor PPS Associates who were previously reprimanded for compliance issues related to SI PPS' compliance standards, policies and procedures;
- Assess, review and revise as necessary, the Compliance Program and/or any policies and procedures promulgated there under, in response to corrective action plans, identified risk areas specific to SI-PPS, and changes in applicable federal, state, and local laws, rules, and regulations;
- Develop, coordinate and participate in compliance education and training programs that focus on the elements of SI-PPS' Compliance Program;
- Maintain logs of all Help Line calls, complaints and/or reports, including the nature of all investigations and results of such investigations.
- Report to the Governing Body and the Compliance Committee regarding all aspects of the Compliance Program;
- Oversee the maintenance of documentation of the following: audit results; logs of Compliance Help Line calls and their resolution; due diligence efforts regarding business transactions; records of education and training, including the number of training hours; disciplinary or corrective action; and modification and distribution of policies and procedures;
- Be an active and integral member of the Compliance Committee and attend all Compliance Committee meetings; and

	<ul style="list-style-type: none"> Implement SI-PPS' exclusion screening program, which shall include reviewing the OIG List of Excluded Individuals/Entities (LEIE), the OMIG Medicaid Terminations and Exclusions List, and other applicable sources of such information prior to hiring, engaging or otherwise transacting business with any person or entity and conducting such review no less than monthly or in accordance with applicable federal, state and local laws, rules and regulations thereafter, to ensure their adequacy and effectiveness. <p>3. The SI-PPS Compliance Officer shall have the following authority in connection with his or her responsibilities as enumerated above:</p> <ul style="list-style-type: none"> Review all documents and information relevant to SI-PPS' compliance. Independently investigate and review any matter brought to the attention of the SI-PPS Compliance Officer, Board of Managers or Compliance Committee that directly relates to SI-PPS' compliance activities, the DSRIP program, and/or compliance with laws and regulations. Recommend disciplinary action to the Board of Managers and/or Chief Executive Officer, Human Resources with respect to any personnel in connection with a violation of any aspect of SI-PPS' Code of Conduct, Compliance Program, policies and procedures and applicable laws and regulations.
Scope:	SI-PPS Board of Managers, SI-PPS Executive staff, SI-PPS Compliance Officer and SI-PPS Compliance Committee
Project(s):	
Regulatory Alignment:	New York Social Services Law §363-d subd. 2 and 18 NYCRR §521.3(c),
Reference(s):	
Attachment(s):	none

Reviewed/Revised by: Regina Bergren – April 2016

Approved by Compliance Committee – August 2016

Partner Organization	Responsible Staff Name & Title	Date Reviewed	Signature