

Chautauqua County COMPLIANCE PROGRAM

The Board of Legislature believes that the development and implementation of a formal regulatory compliance program is consistent with the County's efforts to improve quality and performance, and further reflects the County's long-standing commitment to conduct its business in compliance with applicable constitutional laws and the highest ethical standards.

Chautauqua County seeks to make certain that its activities comply with its Compliance Plan as well as with all applicable rules and regulations of the federal, state, and local government. All directors, staff, contractors, and vendors are strongly advised to learn and use the laws and policies under which we operate.



Compliance Hotline:
716-753-4178

Compliance Email:
Compliance@chqgov.com

What's Your Role?

- Read the compliance plan
- Ask questions if you have them
- Attend compliance training
- Sign training attestation
- Report anything that doesn't seem quite right
- Do the right thing even when no one is watching

About the Confidential Compliance Hotline... The Confidential Compliance Hotline is equipped to handle reports from both identified and anonymous informants. Callers who choose to identify themselves should leave their name and the phone number where they wish to be contacted to provide the additional information listed below. In order for the County to investigate and respond to reports of non-compliance, specific information must be provided, such as who, what, when and where. The name of the work site and the names of the involved parties are essential to the investigation and follow-up. Anonymous callers must leave this information on the hotline.

This service does not replace existing programs and procedures responsible for ensuring compliance with laws, regulations, or policies. Report your concerns even if you are not sure there is a problem. To ensure accuracy and to enable the County to make an informed assessment of your concerns, please provide as many facts as possible.

Ethics Quick Test

- How do I feel about this action?
- Is this action the right thing to do?
- How would I feel if my most respected person knew of my actions?
- Would I behave differently if I knew my action would be reported in the newspaper?

Why do we need to be concerned with compliance? Chautauqua County is a provider of healthcare services. Healthcare is a highly regulated industry. Every individual who is affiliated with the County has a responsibility to comply with federal and state laws, as well as standards and regulations under which we operate. Failure to comply can result in financial damages, and criminal or civil prosecution.

Making the Right Choices... Each of us must use common sense and good judgment. No set of policies can address every decision we make in our daily activities. If you have a question about the right course of conduct, consider these three things:

1. Review the Compliance Plan
2. Contact your Supervisor, Manager or Director
3. Call the Compliance Officer or Compliance Hotline

Examples of Potential Risk Areas

General:

- Forgery or alteration of documents
- Misappropriation or misuse of Chautauqua County resources such as funds, supplies, or other assets
- Unauthorized manipulation of computer files
- Authorizing or receiving compensation for goods not received or services not performed

Health Care Related:

- Billing for services not provided
- Billing for days the person was in the hospital (double billing)
- Billing for more than the service provided (up-coding)
- Service is provided by unqualified staff
- Billing for services that are not authorized or medically necessary

NOTE: Persons who make false claims regarding information, policies or actions that they knew or should have known were false can be prosecuted under the False Claims Act.

C onflict of Interest	<i>We will avoid conflict of interest.</i>
O bligated to Report	<i>All employees are required to report any potential incidents of wrongdoing.</i>
M aintenance of Records	<i>We create and maintain prompt, truthful and accurate records.</i>
P erformance	<i>We consistently provide a higher level of quality than our citizens and customers expect.</i>
L aw Abiding	<i>We act in accordance with all applicable laws and regulations.</i>
I ntegrity	<i>We regard public office and public employment as public trusts and we place honesty above all else.</i>
A uditing	<i>We measure the effectiveness of our compliance program through routine internal audits</i>
N on-Retaliation	<i>We have a policy of non-retaliation. Retaliation for good faith participation in the Compliance Program is unacceptable.</i>
C onfidentiality	<i>We comply with applicable laws and regulations regarding personal privacy and confidentiality of personal information.</i>
E thics	<i>We are committed to maintaining a work environment that promotes the highest ethical standards.</i>

"The art of governing consists simply of being honest, exercising common sense, following principle, and doing what is right and just."
-Thomas Jefferson