

Corporate Compliance Vendor Training

Definition of Compliance- following the laws, regulations, and policies that govern the agency's activities.

To promote agency wide compliance DePaul has:

- Appointed a Corporate Compliance Officer
- Developed a Corporate Compliance Program
- Created a Corporate Compliance Committee
- Developed compliance policies and procedures
- Implemented a Code of Ethics and Standard of Conduct

DePaul's Corporate Compliance Program

DePaul's Corporate Compliance Program outlines a system designed to detect and prevent violations of law by employees, volunteers, officers and directors, vendors, contractors, consultants, and other paid agents.

This program:

- Is led by the Corporate Compliance Officer
- Provides framework to ensure DePaul is complying with internal and external laws, regulations, policies and procedures
- Includes a mechanism for the investigation of suspected or known issues of non-compliance
- Oversees QM functions including:
 - Risk Assessment
 - Auditing and Monitoring
 - Training and Education
 - Policy and Procedure Development

DePaul's Corporate Compliance Committee

A committee that provides **direction** and **policy oversight** for all compliance functions at DePaul. The committee is chaired by the Corporate Compliance Officer and is comprised of the Vice Presidents of all the corporations at DePaul to help ensure the effectiveness of the compliance program.

DePaul's Corporate Compliance Policies and Procedures

DePaul complies with all applicable federal, state and local laws, regulations, and payer requirements. In addition DePaul requires all employees, volunteers, officers and directors, vendors, contractors, consultants, and other paid agents to adhere to the DePaul Code of Conduct and the requirements of the DePaul Corporate Compliance Program.

It is DePaul's policy to detect and prevent fraud, waste and abuse and to prevent any violations of federal or New York State laws regarding fraud or abuse.

DePaul is committed to prompt, complete, and accurate billing of all services that are provided to individuals. No DePaul employee, volunteer, officer or director, vendor, contractor, consultant, or other paid agent will make or submit any false claims or engage in any arrangement at the direction of another person which results, directly or indirectly, in the submission of a false claim.

DePaul communicates the corporate compliance plan and standards to vendors, contractors, consultants, and other paid agents through distribution of this Handbook and on the internet where various documents including but not limited to the Code of Ethics and Standards of Conduct are located.

DePaul's Code of Ethics and Standards of Conduct

DePaul operates under a Code of Ethics and Standards of Conduct which must be adhered to by all employees, volunteers, officers and directors, vendors, contractors, consultants, and other paid agents.

- The Code of Ethics can be found online at <https://www.depaul.org/wp-content/uploads/2017/05/DePaul-Code-of-Ethics-Affected-Individuals.pdf>.
- The Standards of Conduct can be found online at <https://www.depaul.org/wp-content/uploads/2017/05/DePaul-Standards-of-Conduct-Affected-Individuals.pdf>.

These documents provide information regarding:

- The Deficit Reduction and False Claims Acts
- HIPAA
- Conflicts of Interest
- Role Definition
- Gift Policy
- Theft
- Insubordination
- Intentional Misrepresentation of Facts

False Claims Act & Whistleblower Protections

Making or Submitting False Claims

Under the federal False Claims Act, anyone who “knowingly” submits false claims to the federal Government is liable for damages up to three times the amount of the erroneous payment plus mandatory penalties of \$5,000 to \$10,000 for each false claim submitted. (The New York State False Claims Act creates similar penalties for the submission of false claims to the State.) The definition of “knowingly” includes not only a person who has actual knowledge to falsify information in the claim, but also one who acts in deliberate ignorance of the truth or falsity of information in the claim and/or in reckless disregard of the truth or falsity of the information in a claim.

Some examples of conduct which leads to the submission of a false claim include:

- Knowingly making false statements;
- Falsifying records;
- Submitting claims for services never performed or items never furnished;

- Double-billing for items or services;
- Using false records or statements to avoid paying the Government;
- Falsifying time records used to bill Medicaid; or
- Otherwise causing a false claim to be submitted.

Should any employee, volunteer, officer or director, vendor, contractor, consultant, or other paid agent make or submit any false claims or engage in any arrangement at the direction of another person, which results, directly or indirectly, in the submission of a false claim by DePaul this action will be grounds for DePaul to terminate the ongoing services of that employee, volunteer, officer or director, vendor, contractor, consultant, or other paid agent and to take other appropriate remedial action.

“Whistleblower” Protections

No innocent vendor, contractor, consultant or other paid agent or its innocent employee who reports a suspected violation or who participates in an investigation of an alleged violation will suffer any retaliation or reprisal by DePaul.

DePaul will, if requested, make every reasonable effort to keep confidential the identity of a reporter to the extent permitted by law except if doing so would effectively prevent DePaul from conducting a full and fair investigation of the allegations. In every instance, however, every reporter who acts in good faith will be protected against retribution by DePaul regardless of whether the allegations are ultimately determined to be without merit.

Responsibility to Report Suspected or Known Non-Compliance

It is the responsibility of every employee, volunteer, officer and director, vendor, contractor, consultant, and other paid agent to report knowledge of known or suspected non-compliance, misconduct, violations of law, or other wrongdoing immediately and to refuse to participate in any wrongful course of action.

Failure by any employee, volunteer, officer or director, vendor, contractor, consultant, or other paid agent to report known noncompliance by either DePaul or any person or entity acting on behalf of DePaul, or making a report other than in good faith will be grounds for DePaul to terminate the ongoing services of that employee, volunteer, officer or director, vendor, contractor, consultant, or other paid agent and to take other appropriate remedial action.

If you have questions or concerns about the right thing to do or suspect wrongdoing you can either contact the anonymous hotline or the Corporate Compliance Officer.

DePaul’s Confidential Hotline– “ReportIt”

DePaul maintains a "hotline" which can be used to report compliance concerns anonymously by calling 1-877-778-5463, or by going to the internet address www.reportit.net. Complaints regarding any compliance issue will be promptly investigated and remedied as appropriate and required by law.

Corporate Compliance Officer

Lisa Corrigan
Corporate Compliance Officer
1931 Buffalo Rd/ Rochester NY 14621
(585) 719-3127
lcorrigan@depaul.org

Your Protection Regarding Concerns and Complaints

DePaul will not engage in retaliation, retribution, or harassment against any employee, volunteer, officer or director, vendor, contractor, consultant, or other paid agent for reporting compliance related concerns.

Investigation of Suspected Violations

The Corporate Compliance Officer will promptly and thoroughly personally investigate and/or supervise the investigation of any suspected violation in as confidential a manner as possible. The purpose of the investigation will be to determine whether a Corporate Compliance issue exists, and/or whether there has been a violation of policy or applicable legal rules and regulations. If an issue or violation does exist, then the inquiry will attempt to determine its cause, so that appropriate and effective corrective action can be taken. If there is evidence of negligence or intentional misconduct on the part of anyone, then the Compliance Officer will consult with the Executive Staff to determine appropriate disciplinary and/or corrective action that may be warranted.



DePaul
Corporate Compliance Training Vendor Attestation Statement

By my signature below I attest that I have reviewed and understand the Corporate Compliance Vendor Training Handbook. I agree to follow the guidelines set forth in this guidance and understand that if I have questions regarding the Handbook or the Corporate Compliance policies and practices at DePaul I will contact the Corporate Compliance Officer at 585-719-3127.

Company Name

Date

Printed name of authorized representative

Signature of authorized representative

Please detach and sign this form and return the form to:

Lisa S. Corrigan, Corporate Compliance Officer
1931 Buffalo Rd.
Rochester NY 14624

If you'd prefer to fax, or scan and e-mail the signed agreement to us, the fax number is 585 426-0714 or you can e-mail lcarrigan@depaul.org.