

## The Suffolk Health Plan Compliance Program

It is the policy of Suffolk Health Plan (“SHP”) that all employees, providers and subcontractors comply with all state and federal laws and health care program requirements, and conduct themselves with the highest ethical standards. To support that policy, SHP has implemented a Compliance Program which establishes Standards of Conduct, a system for monitoring adherence to our policies, federal and state law, health care program compliance and ethical standards, and a toll-free Hotline to report violations. The purpose of the Compliance Program is to ensure high quality, cost-effective care for our members, to improve operational quality, and to reduce health care fraud and abuse.

### Standards of Conduct

SHP has established a culture that promotes the delivery of high quality care to our client's members and to the prevention, detection, and resolution of instances of conduct that do not conform to federal and state law, health care program requirements, and to the highest ethical standards.

The following are Standards of Conduct for all employees, subcontractors, and contracted providers affiliated with SHP. These standards detail SHP's fundamental principles, values, and our framework for action to meet organizational goals.

#### **SHP expects all employees, subcontractors, and contracted providers to:**

- ◆ Be committed to high quality health care and service delivery;
- ◆ Be committed to compliance with all federal and state laws and regulations;
- ◆ Establish mechanisms to prevent fraud and abuse or when fraud and abuse is detected, to report it immediately;
- ◆ Develop and document policies and procedures that are consistent with law and program requirements;
- ◆ Monitor ongoing compliance with documented procedures through internal and external audits;
- ◆ Incorporate audit findings into future business practices for continuous improvement;
- ◆ Demonstrate integrity, objectivity, and to foster trust with clients and members when conducting business;
- ◆ Participate in training and education programs regarding compliance;
- ◆ Report suspected instances of misconduct to the SHP Compliance Officer without fear of retaliation;
- ◆ Understand that disciplinary action will be taken for failure to comply with these standards of conduct, SHP policies and procedures, federal/state health care program requirements or other wrongdoing;
- ◆ Understand that ignorance is not an excuse for noncompliance; and
- ◆ Think proactively about compliance, rather than reactively.

<b>COMPLIANCE HOTLINE</b> <b>1-877-655-9900</b>
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**The Compliance Hotline** gives you a confidential way to report concerns regarding improper or unethical activity such as inaccurate billing or employee conduct. Leave a confidential, anonymous if you prefer, voice mail message and it will be answered within 24 business hours.