

## 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

## 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.

The Compliance Plan is available in the Regulatory Compliance Folder of All Public Folders on the County Computer Network and on the County's website at [www.co.ontario.ny.us](http://www.co.ontario.ny.us).

**Compliance Hotline:** 866-951-9367  
**Compliance Officer:** John Garvey, 585-396-4468

### Compliance Governance Committee:

Cathy Bentzoni	Bob Hall	Lorrie Scarrott
Mary Burnett	Chris Hoffman	Greg Powers
Gary Curtiss	Supervisor Huber	Nellie Puma
John Garvey	Julie Hoffman	Michael Wojcik
Mary Beer	Darlys McDonough	

## Ontario County Compliance Program

*Do the right thing  
just because it is the right thing to do*



The Board of Supervisors 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.

### What is 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

### 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?

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## Introduction

Ontario 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.

### Why do we need to be concerned with compliance?

Ontario 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.

### Examples of Potential Risk Areas

#### General

- Forgery or alteration of documents
- Misappropriation or misuse of Ontario 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

#### Healthcare-Related

- Billing for services not provided
- Billing for days the person was in the hospital (double billing)
- Billing for more than the service provided (upcoding)
- 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.

## Compliance

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

“The art of governing consists simply of being honest, exercising common sense, following principle, and doing what is right and just.”

— Thomas Jefferson