

SUBJECT: MANDATORY PROVIDER COMPLIANCE PROGRAMS

Consistent with New York State Chapter 442 of the Laws of 2006 and Social Service Law §363-d, the District is required to develop, adopt and implement systemic checks and balances to detect and prevent inaccurate billing and inappropriate practices in the District's programs eligible for Medicaid reimbursement.

At minimum, the District's compliance program will identify the following eight core requirements:

- 1) A code of ethics and procedures informing all providers of Medicaid eligible services of the compliance expectations and guidance in the implementation of the District's compliance program.
- 2) A designated employee who will be responsible for the oversight of the District's compliance program. This individual will provide periodic updates to the Superintendent of Schools and Board of Education.
- 3) Training for all providers of Medicaid eligible services, administrators and the Board of Education on compliance issues, expectations and implementation of the District's compliance program.
- 4) Confidential and anonymous methods of communication for the reporting of compliance concerns to the employee responsible for the oversight of the District's compliance program.
- 5) Expectations for good faith participation in the District's compliance program through the establishment of policies and procedures for identifying concerns including failure to report, participating in non-compliant behavior, and facilitating or permitting non-compliant behavior. Those found in violation of the District's compliance program may be subject to discipline.
- 6) Routine procedures to identify compliance risk areas.
- 7) Establishment of a system for responding to and correcting compliance issues.
- 8) Establishment of a policy of non-intimidation and non-retaliation for good faith participation in the District's compliance program.

Regulations and procedures for the District's mandatory provider compliance program will be developed and placed in administrative regulations.

Adopted: 10/27/09