



Tri-County Family Medicine Program, Inc. Corporate Compliance Plan

Tri-County Family Medicine Program, Inc. (TCFM) is dedicated to maintaining excellence and integrity in all aspects of its operations and its professional and business conduct. Accordingly, TCFM is committed to conformance with high ethical standards and compliance with all governing laws and regulations, not only in the delivery of health care, but in its business affairs and its dealings with employees, administrative staff, physicians, agents, payers and the communities it serves.

As a Federally Qualified Health Center Look-Alike (FQHC LAL), TCFM is also committed to compliance with all requirements specified by the Health Resources and Services Administration (HRSA) and Section 330 of the Public Health Service (PHS) Act. Pursuant to NYS 18 CNCRR 521.3, Tri-County Family Medicine is committed not only to providing patients with high quality and caring medical services, but also to providing ethical services pursuant to ethical, business and legal standards. These standards must apply to everyone with whom we deal which includes patients, other healthcare providers, companies with whom we do business, government entities to whom we report, and the public and private entities from whom reimbursement is sought and received. In this regard all employees must comply with all applicable legal rules and regulations, and avoid even the appearance of impropriety. It is the personal responsibility of all who are associated with TCFM to honor this commitment in accordance with the terms of the TCFM Code of Conduct and related policies, procedures and standards developed by TCFM in connection with the Corporate Compliance Program. TCFM incorporates Corporate Compliance as part of the Quality Assurance/Compliance Committee of the Board.

Tri-County Family Medicine Program, Inc. has:

- Designated a Chief Compliance Officer and Compliance Committee.
- Conducts internal monitoring and auditing;
- Developed written Corporate Compliance Program policies and standards and procedures (available for inspection);
- Conducts appropriate and regular training and education for Board and TCFM employees alike;
- Develops effective lines of communication;
- Responding promptly to detected offenses and undertaking corrective action.
- Promotes the Corporate Compliance Program Support Line (585-335-7355) through internal communications and as part of orientation and ongoing training provided to TCFM and employees alike;



- Enforces disciplinary standards through well-publicized guidelines including policies governing compliance training/education, compliance communications, intimidation/retaliation, and identification of risk areas, following TCFM employee handbook and through regular all-staff meetings and staff newsletter when published;
- Establish methods and audits to ensure nondiscrimination based on an individual's actual or perceived race, color, religion, religious practice, national origin, ethnic group, sex, gender identity, sexual orientation, political affiliation, age, marital status, military status, veteran status, disability, weight or any other basis prohibited by New York state and/or federal nondiscrimination laws in its programs and activities, including delivery of services and employment.

All TCFM employees, board members, and independent contractors and vendors are strongly encouraged to bring concerns to the attention of the Compliance Manager by phone at 585-335-7355, or by email at compliancehotline@tcfmedicine.com. Reports may be made in writing, in person, or via telephone. Email communications should be marked "CONFIDENTIAL." All reports and communications will be confidential and privileged to the extent permitted by law.