



Finger Lakes Community Health Corporate Compliance Plan

Since 1989, Finger Lakes Migrant Health Care Project, Inc. (doing business as Finger Lakes Community Health) has been providing high quality primary medical care, dental, behavioral health, and telehealth services to migrant and season farmworkers and community members throughout the Finger Lakes region and CNY as well as throughout New York State with the migrant voucher program. To enhance as well as preserve our well-deserved positive reputation as providers of these services, everyone associated with Finger Lakes Community Health must share a commitment not only to our patients and our work but also to compliance with the numerous federal, state, and local laws, regulations and policies that govern our conduct. To assist us in maintaining fidelity to our compliance goals, we have developed the Finger Lakes Community Health Compliance Plan that briefly summarizes the various legal and ethical requirements that we must meet. Here is our Compliance Plan.

The Finger Lakes Community Health Corporate Compliance Program demonstrates the health center's strong commitment to honest and responsible conduct; improves the quality, efficiency, and consistency of health care services and operational/administrative activities, while reducing related cost, and; improves the efficiency and effectiveness of employees' and contractors' performance. The Corporate Compliance Program is designed to ensure the health center is compliant with all laws, regulations, and policies that apply to the health center.

Finger Lakes Community Health 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 Finger Lakes Community Health employees alike;
- Develops effective lines of communication;
- Responding promptly to detected offenses and undertaking corrective action.
- Promotes the Corporate Compliance Program Support Line (315.220.0076) through internal communications and as part of orientation and ongoing training provided to Finger Lakes Community Health Board 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 Finger Lakes Community Health 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.

Administrative Offices • 14 Maiden Lane • PO Box 423 • Penn Yan, NY 14527
p: 315-531-9102 • f: 315-531-9103 • w: www.localcommunityhealth.com

Bath Community Health • Geneva Community Health • Newark Community Health • Ovid Community Health
Penn Yan Community Health • Port Byron Community Health • Sodus Community Health • Dundee Dental Center

All Finger Lakes Community Health employees, board members, and independent contractors and vendors are strongly encouraged to bring concerns to the attention of the Chief Compliance Officer by phone at 315-924-6120, by mail at 14 Maiden Lane, PO Box 423, Penn Yan, NY 14527, by email at Compliance@flchealth.org or by use of the Hot Line toll-free number that appears above. Reports may be made in writing, in person, or via the mail. Written communications should be marked "CONFIDENTIAL." All reports and communications will be confidential and privileged to the extent permitted by law.

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