



# COMPLIANCE AT FSL

## 2023

# Compliance Program and Policies

In accordance with Federal, State and Local Government best practice guidelines, FSL's Compliance Program encompasses the **Seven Elements of an Effective Compliance Program**. Through trainings, policies, diverse reporting methods and open lines of communication, the FSL Compliance Program is committed to the prevention of fraud, waste and abuse. The following FSL Compliance Program policies listed below, outline these efforts.

Additional compliance policies are located in the **FSL-Employee Handbook** under the **Workplace Guidelines** section. All FSL workforce members, contractors and agents are expected to know, attest to and comply with the compliance and all other policies, in the FSL-Employee and Compliance Handbooks.

## The Seven Elements of an Effective Compliance Program:

### Element 1: Written Policies and Procedures and Code of Conduct (Ethics)

FSL recognizes that written policies and procedures that describe compliance expectations, as embodied in the Organization's Code of Ethics, are the foundation of an Effective Compliance Program. Key compliance policies and procedures are listed in this section and categorized by the Seven Elements of an Effective Compliance Program. All compliance policies and procedures are reviewed according to their scheduled review date, or as indicated, so that each remains relevant.

Compliance Program Policies:

- Compliance Program Overview Policy # 03.02.02
- Code of Conduct Policy # 03.02.01

### Element 2: Designated Compliance Officer and Compliance Committee

FSL recognizes the designation of a compliance professional, and their ongoing relationship with the Board of Directors, as vital to the success of its Compliance Program. FSL's Chief Legal Office (CLO) and/or designee work closely with the Compliance Committee and oversee the daily operations of FSL's Compliance Program. The FSL Compliance Program works closely with all levels of FSL's Workforce Members to support compliance efforts, deliver solutions, train, educate and mitigate risks.

Compliance Program Policies:

- Compliance Officer and Compliance Committee Policy # 03.02.03

### Element 3: Training and Education

FSL is committed to and believes that an educated workforce is the best defense against acts of wrongdoing. It is the policy of FSL to provide employees with training, as may be reasonably necessary and appropriate, to ensure material compliance with the documentation of services and the submission of claims, as well as, other applicable laws and regulations. All FSL workforce members at orientation and annually thereafter will undergo mandatory training and education concerning compliance matters.

Compliance Program Policies:

- Compliance Education and Training Policy # 03.02.05

Element 4: Open Lines of Communication (Reporting)

All FSL workforce members, contactors and agents are expected to report suspected misconduct or potential violations of the Compliance Program by one of the mechanisms listed below **or** by reporting directly to their Program Director. Note, if a Confidential Hotline is not answered, calls go directly to voicemail. The identity of the reporting person will be kept confidential, **to the extent possible, consistent with the need to investigate the issue raised.**

Compliance Program Policies:

- Lines of Communication Policy # 03.02.06

**Confidential Hotline:**

FSL Hotline for Reporting Fraud, Waste and Abuse (FWA), Privacy and Security (HIPAA) Concerns:

631-907-2067

**Written Submissions and Contact Information:**

FWA Anonymous Written Submission and Contact Information:

[FRAUD, WASTE AND ABUSE INCIDENT REPORT\\*](#)

Craig Greenfield, Chief Legal Officer, 631-647-3373

HIPAA Privacy and Security Anonymous Written Submission and Contact Information:

[HIPAA INCIDENT REPORT\\*](#)

Robert Moerland, Chief Information and Security Officer, 631-647-3373

**FSL Website:**

\*Links for written submission are accessible from the FSL's website by scrolling to the bottom of the homepage and clicking on "[COMMITMENT TO COMPLIANCE AND PRIVACY](#)"

#### Element 5: Disciplinary and Enforcement Guidelines

At FSL, we believe that everyone has a role to play in compliance and as such, awareness is key. In conjunction with the policies listed throughout this handbook and the FSL Employee Handbook, FSL's Disciplinary Guidelines policy is designed to promote, for example, awareness and expectations for reporting suspected incidents, assisting in resolutions and summarizing sanctions for non-compliant behavior. Collectively, FSL's Compliance Policies are designed to educate and promote good faith participation by all FSL employees and agents.

##### Compliance Program Polices:

- Disciplinary Guidelines Policy # 03.02.08

#### Element 6: Compliance Auditing and Internal Monitoring

In promotion of its obligations as a participant in Medicaid, Medicare and other government-funded healthcare payment programs, FSL will conduct ongoing audits to assist in its efforts to monitor the accuracy of claims and other information reported to our payers. These policies are adopted to ensure that claims and reported information are periodically reviewed in a manner which will enable FSL to promptly identify deficiencies in the claim development and submission process, or the data collection and reporting process that may result in inaccuracies.

##### Compliance Program Polices:

- Compliance Auditing and Internal Monitoring Policy # 03.02.07
- Complete and Accurate billing Policy # 03.02.04
- Anti-Kickback and Self-Referral Concerns (vendor screening) Policy # 03.02.14
- Selection of Appropriate Billing Codes Policy # 03.02.11
- Use of Modifiers Policy # 03.02.12
- Routine Waiver of Deductible, Co-payments, and Co-Insurance Policy # 03.02.10

#### Element 7: Response and Prevention

Lastly, FSL recognizes the importance of an effective and efficient response system. FSL stands ready to respond to compliance issues as they are raised by workforce members, or others. FSL's various reporting mechanisms are designed to trigger swift notification and investigation of compliance matters by the compliance staff and thereby, mitigating and implementing resolutions quickly.

##### Compliance Program Polices:

- Responding to Detected Compliance Issues and Corrective Actions Policy # 03.02.09
- Compliance Investigations Policy # 03.02.13