



## Apicha Community Health Center

# COMMITMENT TO COMPLIANCE

At Apicha Community Health Center, we strive to earn the trust of our patients and the respect of the communities we serve. To help us do that we have implemented a Compliance Program and Code of Conduct.

**Who is responsible?** All persons who are affected by Apicha’s “risk areas,” including our employees, the chief executive and other senior administrators, managers, contractors, agents, subcontractors, independent contractors, and governing body and corporate officers.

**What are the rules that must be followed?** The standards set forth in the Apicha Code of Conduct provide an overview of the rules that you are expected to follow. All personnel are provided with a copy of the Code of Conduct and the Compliance Program Structure and Guidelines. We expect everyone to conduct themselves pursuant to the highest ethical, business, and legal standards. If you suspect that someone is doing anything that is illegal or unethical, you must report it.

**Examples of what needs to be reported:**

- Improper billing practices, for example: selecting procedure or diagnosis codes on the basis of whether payment will be made, rather than on the actual diagnosis or procedure provided (‘up-coding’), billing for services not provided, etc.
- Giving or accepting something of value in exchange for referrals
- Improper marketing practices
- Any activity or business practice that could possibly be interpreted as unethical or illegal

## How to Report Compliance Violations

Contact the Compliance Officer, Yumiko Sano

- By email at [Compliance@Apicha.org](mailto:Compliance@Apicha.org)
- By mail at 400 Broadway, NY, NY 10013
- Compliance Drop-Box at 2<sup>nd</sup> floor reception
- Call the Compliance Phone Line anonymously at 646-572-2279

All reported compliance issues will be investigated.

You may raise the issue anonymously if you wish. If you report through the Compliance Phone Line, your identity will be kept confidential unless the matter is subject to a disciplinary proceeding, referred to or under investigation by MFCU, OMIG or law enforcement, or disclosure is required during a legal proceeding.

Be assured that intimidation or retaliation against anyone who in good faith raises a compliance issue or otherwise participates in Apicha’s Compliance Program is strictly prohibited.