

Innovative Health Alliance of New York

Policy No. 03

EFFECTIVE DATE: 9/21/15

POLICY TITLE:

Compliance Reporting System

REVIEW BY: 9/21/17

POLICY

Innovative Health Alliance of New York (IHANY) will establish a system to enable ACO Participants, ACO Providers/Suppliers, and other individuals or entities performing functions or services related to IHANY to report actual or suspected violations of law, regulations or IHANY policies, including the Code of Conduct, including on an anonymous basis.

PROCEDURE

1. ACO Participants, ACO Providers/Suppliers, and other individuals or entities performing functions or services on behalf of IHANY are required to report in good faith any actual or suspected concerns that involve IHANY's participation in the Medicare Shared Savings Program ("MSSP").
2. Individuals may choose one or more of the following methods for reporting:
 - a. Speak directly with a member of IHANY management;
 - b. Contact the IHANY Compliance Officer at (518) 701-2193;
 - c. File a telephone report with the IHANY Compliance Hotline at 1-866-477-4661. The Compliance Hotline is staffed 24 hours a day, 7 days a week by an outside organization.
 - d. File a report online at www.mycompliancereport.com. When prompted for an access ID use THO
3. Individuals filing a report using either the telephone or the online reporting system will have the option to remain anonymous if they so choose. Individuals who identify themselves will be provided a report identification number to check back later on the status and ultimate resolution of their report. Follow-up reporting is not available to individuals who choose to file an anonymous report.
4. ACO Participants, ACO Providers/Suppliers, and other individuals or entities performing functions or services on behalf of IHANY who receive reports of alleged violations of law,

regulations or policies involving IHANY are required to promptly notify the IHANY Integrity and Compliance Officer or legal counsel for investigation.

5. The identity of individuals filing compliance reports and the information provided will be treated confidentially throughout the process of investigation to the extent possible under applicable laws and as necessary to ensure a complete investigation of matters reported.
6. IHANY policy prohibits retaliation against any individual reporting a potential compliance issue in good faith. Individuals who believe they have been retaliated against for reporting a compliance matter are encouraged to report their concern using one of the options listed in #2 above. All cases of retaliation will be promptly investigated.
7. Information concerning the responsibility of individuals to report compliance issues and concerns, including violations of law, regulations or IHANY policies, and resources available to report such matters, including the Integrity & Compliance Hotline, will be communicated to ACO Participants and ACO Providers/Suppliers through IHANY's training materials, website, policies and procedures, and other communications.

DEFINITIONS

Accountable Care Organization ("ACO") means a legal entity that is recognized and authorized under applicable State, Federal, or Tribal law, is identified by a Taxpayer Identification Number (TIN), and is formed by one or more ACO participants.

ACO Participant(s) means an individual or group of ACO provider(s)/supplier(s) that is identified by a Medicare-enrolled Tax Identification Number (TIN), that alone or together with one or more other ACO participants comprise(s) and ACO, and that is included on the required list of ACO participants.

ACO Provider/Supplier(s) means an individual or entity that is a provider or a supplier that is enrolled in Medicare, that bills for items or services it furnishes to Medicare fee-for-service beneficiaries under a Medicare billing number assigned to the TIN of an ACO participant, and that is included on the required list of ACO providers/suppliers.

POLICY CONTACT

For questions regarding this policy, please contact IHANY's Compliance Officer at (518) 701-2193

RELATED POLICIES AND OTHER MATERIALS

- 42 C.F.R § 425.300 (a) (3) – *Compliance plan*.

APPROVALS

Initial Approval: Board of Directors 9/21/15

Subsequent Review/Revision(s):

4/16/2018 - revision