

Compliance Hotline

315-272-2905

How do you report compliance/ethical concerns?

Call the Compliance Hotline @ 315-272-2905

*(If you wish to remain anonymous enter *67 before calling the hotline number)*

or

Email: compliance@rcil.com

Who can make the call?

Anyone who has a concern related to RCIL services.

What types of concerns would warrant a call to the Compliance Hotline?

-Abuse/Mistreatment	-Policy and Procedure Violations
-Falsification of Documentation	-Violation of Laws or Regulations
- Medicaid Fraud such as billing for services that were not provided.	-Breach of Consumer Confidentiality

This list does not include all the possible violations but provides examples of the different types of concerns that RCIL's Compliance Office would like to hear about.

Available 24 hours a day / 7 days a week

- All information provided is treated as confidential as possible to the extent permitted by law.
- Calls can be made without fear of retribution or retaliation.

Medicaid Fraud

What is Medicaid Fraud?

The Federal False Claims Act (FCA) describes Medicaid Fraud as the act of knowingly submitting or causing another to submit false claims for payment of government funds. An example of a FCA violation includes submitting false time records for services that were not rendered.

What are the consequences for committing Medicaid Fraud?

- Consumers risk losing services covered under Medicaid.
- Personal Assistants/Workers may face disciplinary action up to and including employment termination.
- Legal consequences for the Consumer, Designated Representative/Designees, and/or the Personal Assistants/Workers.

Examples of how to prevent Medicaid Fraud:

- Only sign documents with your own signature.
- Personal Assistants/Workers should clock in/out their own hours and work the actual hours clocked in for.
- Personal Assistants/Workers should perform identified job tasks related to the needs of the Consumer only.
- Notify RCIL of a consumer hospitalization, rehabilitation, or nursing home admission and Personal Assistants/Workers should not work during this time.

Any concerns of Medicaid Fraud should be reported to RCIL's Compliance Department at 315-272-2905 or email – compliance@rcil.com.

RCIL's Compliance Program is based on:

- ◆ The Federal False Claims Act (FCA): Outlines measures to detect and avoid fraud, waste, and abuse. Under the FCA, it is unlawful to knowingly submit or cause the submission of false claims to Medicaid or make false records that support billing Medicaid. FCA imposes liability (fines) on persons and companies who defraud government funded programs.
- ◆ The Federal Deficit Reduction Act of 2005 (DRA): Another measure to eliminate fraud, waste, and abuse that requires certain organizations to provide detailed information via written policies and training on the FCA, remedies for false claims, civil or criminal penalties for false claims, and protections for whistleblowers.
- ◆ New York State False Claims Act: As to prevent abuse, fraud, and waste, NYS empowers people with evidence of fraud to file a complaint and potentially receive a monetary reward for doing so.
- ◆ Health Insurance Portability and Accountability Act of 1996 (HIPAA): U.S. legislation providing data privacy and security provisions for safe-guarding health/medical information.
- ◆ New York State SHIELD Act (2019): The "Stop Hacks and Improve Electronic Security Act" works with HIPAA to ensure data breaches are reported. It protects certain private information of New York State residents and requires reporting to the NYS Attorney General of certain electronic security issues.
- ◆ New York State Non-Profit Revitalization Act of 2013 (NPRA): Sets legal requirements for governance (boards) of nonprofit organizations (both not-for-profit corporations and wholly charitable trusts), expands the Attorney General's enforcement powers, and clarifies rules applicable to not-for-profit corporations.
- ◆ Federal and New York State Department of Labor Regulations.
- ◆ Others as applicable.

You may also visit www.omig.state.ny.us to obtain additional information about New York laws that impact compliance needs. Contractors and vendors are encouraged to make reports of any compliance concerns.

You can contact RCIL's Chief Corporate Compliance Officer with any questions or concerns at 315-738-2735 or compliance@rcil.com. You can also call RCIL's Compliance Hotline at 315-272-2905. Calls can be made anonymously and without fear of retribution or retaliation.

This information and RCIL's Corporate Compliance Policy can be found at www.rcil.com, under the Compliance section.