

Corporate Compliance

Skyward Health is committed to serving its patients, community and everyone with whom it does business pursuant to the highest ethical, business and legal standards. To that end, Skyward Health has implemented a comprehensive Compliance Program to ensure that legal and ethical conduct is an integral part of our organization's culture and operations. This Compliance Program extends our ethical, business and legal standards to our contractors, agents and other entities that provide services to us and our patients (collectively, our "vendors"). It is our intent that Skyward Health's vendors are in compliance with all applicable laws, rules and regulations and that, to the extent applicable, they follow Sun River's Compliance Program.

Skyward Health's Compliance Program is designed to prevent noncompliance and fraud, waste and abuse ("FWA") of federal health care dollars. FWA is a national problem that affects all of us directly or indirectly. Billions of dollars are lost each year, which drives up healthcare costs and premiums. We are all responsible for preventing, detecting and mitigating FWA.

Definitions

Fraud – Intentional misrepresentation, falsification or concealment of information for financial gain. Example: Knowingly billing for services or supplies not provided; knowingly billing for services more complicated than the services actually provided.

Waste – includes any practice that results in an unnecessary use or consumption of financial or medical resources. Waste does not necessarily involve personal gain, but often signifies poor management decisions, practices or controls. Example: Medically unnecessary service.

Abuse – is a practice that is inconsistent with accepted business, financial or medical practices or standards, that results in unnecessary cost or in reimbursement.

Example: Improper billing for a non-covered service or upcoding; Charging excessively for services or supplies.

As a Skyward Health vendor, you are obligated to comply with the following requirements.

Compliance with Skyward Health's Compliance Policies and Procedures and Code of Conduct

Vendors must review and, when requested, adopt Skyward Health's compliance policies and procedures and Standards of Conduct. Our Compliance Program is a reflection of our mission and core values. We believe our organizational integrity is a critical element of our accountability to our patients, our community and ourselves.



Accurate Claim Submission and Financial Accounting

Vendors involved with claims submission, financial accounting, and preparing or filing report with government agencies must comply with Skyward Health policies regarding proper claim preparation and submission and financial accounting. The following are key matters concerning billing:

- Only reasonable and necessary services are billed,
- Coding of services and items are accurate and appropriate,
- Appropriate payers are billed, and
- Documentation of services is accurate and complete.

Compliance with Laws and Regulations

Skyward Health has established procedures to monitor compliance with various legal requirements, including the anti-kickback, Stark, tax exemption and antitrust laws and regulations. As appropriate, vendors are expected to understand the prohibitions on offering, paying or receiving any money, gifts or services in return for the referral of patients or to induce the purchase of items or services.

HIPAA Compliance and Business Confidentiality

Vendors must comply with relevant provisions of the Privacy and Security Rules of the Health Insurance Portability and Accountability Act (HIPAA) and, as applicable, the terms of their Business Associate Agreements with Skyward Health. In addition, vendors may not engage in the unauthorized disclosure of confidential business information, including trade secrets, commercially sensitive information or financial information about Skyward Health.

Reporting of Violations and Non-Retaliation Policy

Every employee, contractor and agent of a Skyward Health vendor is required to report any known or suspected violation of the Skyward Health Compliance Program or Standards of Conduct to an appropriate representative of Skyward Health. As feasible and to the extent possible, these reports will be kept anonymous. There are several ways vendors and their employee, contractors and agents can report compliance issues or concerns. Please be assured that there will be no intimidation of, or retaliation against, anyone who in good faith reports a compliance concern.

Non-Intimidation and Non-Retaliation Policy

In addition, vendor's employees may not be subject to any reprisal for a good faith report of a suspected violation or fraud, waste and abuse to Skyward Health. As a vendor of Skyward Health, you are required to have written policies of non-intimidation and non-retaliation which protect individuals and entities who/which make good faith reports of potential compliance issues.

Contact the Compliance Officer Directly

Vitina Salvato, Director of Quality and Compliance 845-745-1703, vsalvato@skywardhealth.org

Contact Anonymously

Skyward Health's Compliance Hotline: 833-210-7762



Non-employment or Retention of Sanctioned Individuals or Vendors

Vendors must prohibit the employment of individuals, contractors or agents or use of downstream vendors that have been convicted of a criminal offense related to health care or are listed by a federal agency as debarred, excluded or otherwise ineligible for participation in federally-funded health care programs. U.S. Department of Health & Human Services Office of General Inspector (OIG) and the New York State Office of Medicaid Inspector General (OMIG) requires healthcare organizations to conduct appropriate screenings at hire and monthly thereafter to ensure that they do not employ or do business with individuals or entities that are convicted of criminal violations or have been the subject of sanctioning, debarment or exclusion.

To learn more about these requirements, contact Skyward Health's Compliance Officer or visit the OIG website, <http://oig.hhs.gov/exclusions/background.asp> and the OMIG website, <http://www.omig.ny.gov/fraud/medicaid-terminations-and-exclusions>

