

Oswego Health’s compliance program incorporates the eight elements required for a NYS Non-Profit Healthcare Organization.

Compliance Program Requirement	Oswego Health’s Approach
Written policies and procedures, including Code of Conduct	Compliance Plan, including Code of Conduct, on Oswego Health website Compliance related policies included with administrative policies. “Corporate Compliance” icon on each computer desktop with relevant information including those related to whistleblower protection and compliance with federal and state laws
Administration and oversight of Compliance Program	Ralph Hanselman, Director of Compliance and Internal Audit, available at 349-5939 or rhanselman@oswegohealth.org , administers the compliance program Audit Committee of Oswego Health Board oversees the compliance program Compliance Committee develops and implements the annual compliance workplan.
Training and education	Compliance training occurs at orientation and at least annually. Specific training occurs on complex, high risk areas
Communication lines, including an anonymous process for reporting potential compliance issues	Potential compliance issues can be reported to the department manager/supervisor or the Corporate Compliance Officer. Anonymous complaints can be reported via the Ethics Point hotline at www.ethicspoint.com or (888)373-5826.
Fair, consistent discipline for: (a) failing to report suspected problems; (b) participating in non-compliant behavior; or (c) encouraging, directing, facilitating or permitting non-compliant behavior	Disciplinary actions are addressed through HR’s progressive disciplinary process. New employees are checked to ensure they are not on a federal exclusion list.
Risk identification, auditing and monitoring	The Compliance Committee assesses risk while developing the annual compliance work plan. Internal monitoring and auditing is performed. External reviews of certain identified high risk areas
System for investigating potential compliance problems	Reports of suspected non-compliance are investigated and reported to the appropriate regulatory agency. Corrective action plans are developed to prevent further non-compliance
Policy of non-intimidation and non-retaliation	Employees will not be retaliated against for reporting potential compliance issues, either internally or to an external regulatory agency.

If you have any questions regarding Oswego Health’s Compliance Program, please contact our Corporate Compliance Officer at rhanselman@oswegohealth.org or by phone at 315-349-5939.