

Commitment to Prevention and Detection of Fraud

ARC of Rockland requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Board members, officers, employees and volunteers of the organization must practice honesty and integrity in fulfilling their responsibilities and complying with all applicable laws and regulations.

ARC of Rockland is subject to all federal and state laws regarding fraud, waste, and abuse in government-funded/regulated programs. The False Claims Act is one of the laws the government uses to prevent and detect fraud, waste and abuse in federal health care programs. It prohibits anyone from “knowingly” submitting false claims to the government. The False Claims Act defines “knowingly” to mean that a person: 1) has actual knowledge of the false claim; 2) acts in deliberate ignorance of the truth or falsity of the information; or 3) acts in reckless disregard of the truth or falsity of the information. Specifically, the False Claims Act may be violated by the following acts:

- Knowingly presenting, or causing to be presented, a false or fraudulent claim for payment or approval by the Federal Government;
- Knowingly making or using, or causing to be made or used, a false record or statement to get a false claim paid or approved;
- Conspiring to defraud the Government by getting a false or fraudulent claim allowed or paid; or
- Knowingly making, using, or causing to be made or used, a false record or statement to conceal, avoid, or decrease an obligation to pay money or transmit property to the Government.

ARC of Rockland has an open door policy and suggests that individuals share their compliance questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor’s response, you are encouraged to speak with the Compliance Officer. Individuals may also report their compliance concerns confidentially to the ARC of Rockland’s Compliance Hotline. The Compliance Hotline telephone number is 845-267-2500 X3131. Supervisors are required to report complaints or concerns about suspected ethical and legal violations in writing to the Compliance Officer, who has the responsibility to investigate all reported complaints. The Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved.

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation.

ARC of Rockland is prohibited from taking any adverse actions against persons who notify the government of actual or potential violations. ARC of Rockland will not impose any disciplinary or other action in retaliation against individuals who make a report or

complaint in good faith to the government or to their supervisor, the Compliance Officer or to administrator of ARC of Rockland, regarding a practice that the individual believes may violate ARC of Rockland's Corporate Compliance Plan, Code of Ethics, Standards of Conduct, its Compliance Policies, the False Claims Act or any of the laws, rules or regulations by which ARC of Rockland is governed.

Please refer to the agency's policies entitled, "Reporting Compliance Concerns—Anti Retaliation" and, "False Claims Act" for further information. Both can be obtained by contacting the Compliance Officer.