



**Executive Summary for
ECMCC Board of Directors
12/15/2015**

Millennium Collaborative Care

Compliance Program

The New York State Office of the Medicaid Inspector General (OMIG) and the New York State Department of Health (DOH) has set expectations for the Delivery System Reform Incentive Program (DSRIP). DSRIP PPS (Performing Provider Systems) Lead (ECMCC) has the obligation to create a comprehensive Compliance Program that encompasses the New York Social Services Law Section 363-d (SSL 363-d) and Title 18 of the New York Codes Rules and Regulations at Part 521 (Part 521).

The Compliance Plan is mandatory, it is the responsibility of the PPS Lead (ECMCC) to create, implement and designate a compliance officer to have oversight of the Compliance Program.

NYS DOH has provided compliance guidance for the required DSRIP Compliance Plan. The Millennium Collaborative Care, PPS Compliance Program has been structure after other NYS PPS Leads, provided guidance documents and the Eight Elements of a Mandatory Compliance Program:

1. Written Policies and Procedures that describe compliance expectations as embodied in a code of conduct or code of ethics
2. Designation of Compliance Officer –an employee vested with responsibility for the day-to-day operation of the compliance program
3. Training and Education of all affected individuals on compliance issues, expectations and the compliance program
4. Communication Lines to the Compliance Officer that are accessible to all affected individuals to allow compliance issues to be reported
5. Disciplinary Policies to encourage good faith participation in the compliance program
6. System for Routine Identification of Compliance Risk Areas and Non-Compliance
7. System for Responding to Compliance Issues when raised, for investigating and correcting problems
8. Policy of Non-Intimidation and Non-Retaliation for good faith participation in the compliance program

Millennium Collaborative Care, PPS being a unique entity from the Lead PPS (ECMCC), a separate Code of Conduct, Conflict of Interest and a Policy and Procedure document have been created and will be monitored by the DSRIP compliance officer with final approval by the ECMCC Board of Directors.