



**Cancer Care Co-Payment Assistance Foundation, Inc.
Policy and Procedure**

Title/Subject:	Compliance Reporting and Non-Retaliation
Number:	
Original Effective Date:	November 18, 2019
Revision Date:	
Sponsor:	
Approved By:	
For Use By:	CCAF-wide

Purpose: To set forth the process pursuant to which Cancer Care Co-Payment Assistance Foundation, Inc. (“CCAF”) employees and, where applicable, subcontractors and agents, can ask questions and report potential violations of law or CCAF policy by CCAF or its employees, consultants, without fear of retaliation.

Definitions:

Advisory Opinion: an opinion issued by the Department of Health and Human Services Office of Inspector General (“OIG”) as to a proposed arrangement and whether the OIG would deem such proposed arrangement to violate the federal Anti-Kickback Statute and/or Beneficiary Inducement Statute. CCAF operates the Co-Payment Assistance Program in accordance with its OIG Advisory Opinion, 07-11, as modified.

Compliance Officer: As of the Effective Date of this Policy and Procedure, John Rutigliano.

CCAF Code of Conduct: The Cancer Care Co-Payment Assistance Foundation, Inc. Code of Conduct, adopted as of November 18, 2019.

Policy: All CCAF employees and, where applicable, subcontractors and agents, have a duty to report any suspected violation of law, regulation, OIG guidance, CCAF’s Advisory Opinion, or CCAF’s compliance policies and procedures to CCAF and may do so without fear of retaliation.

Procedures:

Asking Compliance Questions

1. All CCAF employees and subcontractors and agents are encouraged to ask questions about laws, regulations and OIG guidance applicable to CCAF and its operations and CCAF’s Advisory Opinion or CCAF compliance policies and procedures.

CancerCare® Co-Payment Assistance Foundation * 275 7th Ave, 22nd Floor, New York, NY 10001
Toll Free 866-552-6729 * Fax 212-601-9760

2. A CCAF employee can pose questions to Senior Management or the Compliance Officer.
3. A CCAF subcontractor or agent can pose compliance-related questions to their primary point of contact at CCAF. The Compliance Officer will be consulted as needed in responding to compliance questions posed by CCAF subcontractors and agents. A CCAF subcontractor or agent that does not receive a satisfactory answer to his/her compliance-related questions from their primary point of contact may escalate the question to the Compliance Officer.

Reporting Suspected Violations

1. All CCAF employees and, where applicable, subcontractors and agents have a duty to report any suspected violation of law, regulation, OIG guidance, CCAF's Advisory Opinion or CCAF compliance policies and procedures to CCAF. Essentially, CCAF employees and, where applicable, subcontractors and agents should report actions/inactions by CCAF or any party acting on behalf of CCAF that they suspect could potentially violate law, regulation, OIG guidance, CCAF's Advisory Opinion or CCAF compliance policies and procedures.
2. Failure to report suspected violations of law, regulation, OIG guidance, CCAF's Advisory Opinion or CCAF compliance policies and procedures violates the CCAF Code of Conduct and may lead to disciplinary action up to and including termination.
3. Such suspicions may be reported by a CCAF employee to Senior Management. Managers who receive reports about suspected compliance violations must report these suspicions to the Compliance Officer immediately. All reports will be kept confidential, to the extent possible.
4. Alternatively, CCAF employees and subcontractors and agents may report suspected compliance violations by contacting the Compliance Officer by phone at 212-712-6151 or email to johnr@cancercare.org
Or
anonymously and confidentially via email or by mail (which will be forwarded to the Foundation's Board for review)

compliance@cancercarecopay.org
Cancer Care Co-Payment Assistance Foundation Compliance Officer
Cancer Care Co-Payment Assistance Foundation
275 Seventh Avenue
22nd Floor
New York, NY 10001
5. All reports should contain as much detail as possible so that a thorough investigation may be conducted. This is especially important if reports are made anonymously since the identity of the writer would not be available if the investigator(s) need additional information or have any questions. Reports of suspected violations should include, at a minimum, the following information:

- The date(s), time(s) and place(s) where the violation took place
 - The person(s) involved, including any witnesses
 - The nature of the violation(s)
 - Details of the action(s) or activity (ies) surrounding the violation
 - If the caller or writer desires a response to his or her report, or to be contacted for questions or additional information, the caller's name, phone number and /or address
6. The Compliance Officer log all reports of suspected violations and will investigate such reports in accordance with the Investigating Reports of Potential Non-Compliance Policy and Procedure.

Non-Retaliation

1. All CCAF employees, subcontractors and agents are protected from retaliation related to the good faith reporting of suspected violation of law, regulation, OIG guidance, CCAF's Advisory Opinion, the CCAF Code of Conduct or the CCAF's policies and procedures.
2. Any alleged retaliation will be investigated and, upon substantiation, met with disciplinary action up to and including termination for CCAF employees involved in such retaliation.

Annual Review of this Conflict of Interest Policy and Procedure

1. The Compliance Officer will review this policy and procedure on an annual basis and update it if and as needed.

Related Policies:

1. Investigating Reports of Potential Non-Compliance