

Guiding Principles of Corporate Compliance

1. ILA will provide training in these policies and procedure to all its employees, contractors, agents, officers, directors and volunteers providing substantial services to the Agency. This training will be provided to all new employees as part of the new employee orientation.
2. ILA will perform billing activities in a manner consistent with the regulations and requirements of third party payers, including Medicaid and Medicare.
3. ILA will conduct regular auditing and monitoring procedures as part of its efforts to assure compliance with applicable regulations.
4. Any employee, contractor, agent, officer, director or volunteer who has any reason to believe that anyone is engaging in false billing practices or false documentation of services is expected to report the practice according to ILA'S Reporting of Compliance Concerns and Non-Retaliation Policy and Procedure.
5. Any form of retaliation against any individual who reports a perceived problem or concern in good faith is strictly prohibited.
6. Any employee, contractor, agent, officer, director or volunteer who commits or condones any form of retaliation will be subject to discipline up to, and including, termination, or in the case of director or volunteer, removal.
7. The Compliance Officer will ensure that all employees, contractors, agents and volunteers receive training related to the contents of these policies, the False Claims Act and all other applicable laws as contained within. The Compliance Officer will ensure that records are maintained to document the receipt of training. The Chair of the Compliance Committee will insure that all directors of the Agency receive training related to the contents of these policies, the False Claims Act and all other applicable laws. The Chair of the Compliance Committee will ensure that records are maintained to document the receipt of training.
8. The Compliance Officer will assure that these policies and associated procedures are attached to any contract with outside contractors or agents as defined within.