



Corporate Compliance and False Claims Act

CORPORATE COMPLIANCE

PARC has implemented a Corporate Compliance Program, which includes Standards of Conduct and a Code of Ethics applicable to all employees and consultants. Each employee or consultant is required to review the Standards of Conduct and Code of Ethics and comply with the Corporate Compliance Program. PARC will take disciplinary action for those who fail to report a suspected violation of the Corporate Compliance Plan, participate in non-compliant behavior, and/or encourage, direct, facilitate or permit non-compliant behavior. As part of our compliance program, any employee or consultant who is convicted of a felony or misdemeanor must immediately make a confidential report of such conviction to the Human Resources Director. Any employee or consultant who is excluded from or sanctioned by either the Medicare or Medicaid program must immediately report that fact to the Corporate Compliance Officer. Failure to comply will result in disciplinary action up to and including termination.

The Federal False Claims Act authorizes the use of civil penalties of between \$5,000 and \$10,000, plus three times the amount of damages the government sanctions, where a person knowingly presents, or causes to be presented, a false or fraudulent claim; knowingly makes, uses or causes to be used, a false record or statement to get a false or fraudulent claim paid; or conspires to defraud the government in connection with the payment of a false or fraudulent claim. In addition, under New York State law it is a crime to knowingly and willfully provide false information or omit material information when billing for services. Submitting or causing a false claim to be submitted is an unacceptable practice under the New York State Medicaid Program, which can lead to fines and exclusion from the Medicaid program. In addition, there are both Federal and State laws related to kickbacks and inappropriate referrals that impose criminal and civil penalties for violations.

Our Corporate Compliance Program was created to assist the organization in detecting fraud, waste and abuse so that appropriate measures may be taken. Employees or contractors who participate in the investigation of a possible False Claims Act violation may not be retaliated against.