MEMORANDUM

TO: OneCity Health DSRIP Partners

FROM: Catherine G. Patsos, Esq., CHC
Chief Corporate Compliance Officer
Corporate Privacy and Security Officer
NYC Health + Hospitals

DATE: May 11, 2020

RE: NYC HEALTH + HOSPITALS/ONECITY HEALTH
DSRIP COMPLIANCE TRAINING REQUIREMENTS

The purpose of this memorandum is to provide all performing providers (referred to as “Partners”) in the OneCity Health Performing Provider System (“PPS”) (“OneCity Health”) with information about their compliance training obligations.

I. Legal Requirements

Pursuant to New York State Social Services Law and regulations, NYC Health + Hospitals is required to adopt and implement an effective compliance program, which includes the provision of periodic compliance training and education of all workforce members and persons associated with NYC Health + Hospitals on compliance issues and expectations, and the compliance program operation. Under the OMIG Delivery System Reform Incentive Payment (“DSRIP”) program compliance guidance, these training and education requirements extend to the DSRIP program. Accordingly, all Partners who have received or are eligible to receive DSRIP funds are required to provide training and education about OneCity Health’s compliance program to their workforce members.

II. OneCity Health DSRIP Compliance Training and Education

OneCity Health is responsible for ensuring that its Partners complete DSRIP compliance training. To assist OneCity Health in meeting such training and education

---

1 See OMIG’s DSRIP Compliance Guidance 2015-01 Revised: Special Considerations for Performing Provider System (“PPS”) Leads’ Compliance Program, fn1, supra, at pgs. 2-3) Special Considerations by Element – Element 3).
requirements, NYC Health + Hospitals’ Office of Corporate Compliance (“OCC”) developed a compliance training course entitled “DSRIP Compliance Training”. Partners who do not provide their workforce members with the required compliance training could exercise either of the following approaches to appropriately utilize the training provided by the OCC:

(i) Incorporate components of the DSRIP Compliance Training into any of their current methods of compliance training and education; or
(ii) Simply distribute the DSRIP Compliance Training to workforce members involved with or otherwise affected by the DSRIP program.

DSRIP Compliance Training is available on the OneCity Health Compliance website at: https://www.onecityhealth.org/dsrip-compliance/.

III. OneCity Health DSRIP Compliance Training Course Content

The OneCity Health DSRIP Compliance Training course covers the following topics:

1. *Introduction to DSRIP*, which provides an introduction to the DSRIP program as well as: (i) discusses the key players involved in the DSRIP program; and (ii) reviews several important terms that are unique to the DSRIP program.

2. *General Compliance Requirements for Medicaid Providers*, which elaborates on the definition of the term Compliance, as well as its purpose and benefits, including the importance of early detection and reporting of compliance issues. This section also discusses Medicaid compliance program certification requirements, compliance risk areas, and the eight required elements of an effective compliance program.

3. *Special Considerations for DSRIP Compliance*, which expands upon compliance program elements as they pertain to DSRIP-related compliance requirements. This section includes the eight DSRIP-specific compliance program elements and further describes how OneCity Health is fulfilling these elements.

4. *Fraud, Waste and Abuse & Relevant Laws*, which provides the definitions of the terms fraud, waste, and abuse, as used in the health care context, and specific examples of fraud, waste, and abuse. This section also provides an overview of some important Federal laws that are relevant to understanding OneCity Health’s compliance requirements including: (i) the Deficit Reduction Act of 2005 (“DRA”); (ii) the False Claims Act; (iii) the Physician Self-Referral Law; (iv) the Anti-kickback Statute; (v) the Criminal Health Care Fraud Statute; (vi) the Civil Monetary Penalties Law; and (vii) the Exclusion Authorities.
5. *Reporting Compliance Issues*, which provides information on how to report compliance issues or concerns to the NYC Health + Hospitals OCC.

IV. **Questions or Additional Information**

Partners are encouraged to contact the OCC at (646) 458-5632 or compliance@nychhc.org if they have any questions pertaining to compliance training requirements or other DSRIP-related compliance concerns.