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Cancer Center

[Make an Appointment](#)

[← Back](#)

[Vendor Compliance Information](#)

[Home](#) [Appointments & Treatment](#)

[Refer a Patient](#)

ABOUT US

[Our mission, vision & core values](#)

[Leadership](#)

[History](#)

[Equality, diversity & inclusion](#)

[Annual report](#)

[Give to MSK](#)

MSKCC is committed to complying with Section 6032 of the Federal Deficit Reduction Act of 2005 as well as with all other federal and state and local laws and regulations and ensuring that its billing to the Medicare program, the New York State Medicaid program and other federal and state sponsored programs is accurate and conforms to applicable law.

II. MSKCC Compliance Program & Code of Conduct

MSKCC has implemented a Compliance Program to ensure that our business is conducted in accordance with the highest standards of ethics and integrity. At the heart of this program is MSKCC's Code of Conduct, which sets forth the values and standards of conduct that govern the behavior of everyone associated with MSKCC, including our employees, volunteers, vendors, and contractors. The Compliance Officer is responsible for the compliance program and reports directly to MSKCC's Executive Vice-President and its Board of Directors. MSKCC's Compliance policies and procedures are set forth in detail in our compliance plan which is available on the MSKCC intranet under "Compliance" and in the MSKCC employee handbook.

III. Detecting and Preventing Fraud

MSKCC expects that its employees will do everything they can to prevent and detect false claims and potentially fraudulent behavior. The following are examples of measures that MSKCC takes to accomplish this:

- providing staff training
- investigating reports of potential violations from staff
- investigating complaints regarding potential violations from patients, family members, and visitors
- providing anonymous and confidential reporting mechanisms, such as the MSKCC hotline

- internally monitoring higher risk areas
- performing internal & external audits
- protecting employees who report potential fraud or abuse
- performing background checks and screening of new employees
- performing internal risk assessments
- corresponding with state and federal agencies regarding potential concerns

IV. Reporting Non Compliance

These laws also impose an affirmative obligation on MSKCC and its employees, agents and contractors to know and understand the rules and regulations regarding the submission of claims. MSKCC's policies require all employees to report any known or suspected improprieties to their supervisor or to the Compliance Officer. Reporting actual or potential noncompliance is a condition of employment for all employees. MSKCC supports employees in fulfilling this obligation by its policies prohibiting non-retaliation against staff who report in good faith and by providing an external hotline that allows employees to report issues anonymously. MSKCC expects its vendors and contractors to support our efforts to prevent and detect practices that could potentially violate laws, regulations, or MSKCC's policies. Any employee of a vendor or contractor who has concerns about the work they do for MSKCC or work done by MSKCC should report these concerns to the Compliance Officer at [646-227-2617](tel:646-227-2617). Concerns may also be reported through the MSKCC Hotline, an anonymous and confidential method of reporting, by calling [866-568-5421](tel:866-568-5421).

V. MSKCC Policies on Prevention and Detection of Fraud and Abuse

All MSKCC employees and any contractors or agents of MSKCC should be aware of MSKCC policies regarding detection and prevention of health care fraud and abuse. These policies can be accessed online through the MSKCC intranet or by contacting the Compliance Office at [646-227-2622](tel:646-227-2622).

MSKCC's policies relevant to the prevention and detection of fraud and abuse include:

- MSKCC Code of Conduct;
- Admin Pol. & Proc. #1002 Code of Ethical Behavior
- Admin Pol. & Proc. #2309 Billing Compliance
- Compliance Program Manual- Verification of OIG Exclusion Status and Criminal Conviction Records for Employees and Contracted Residents
- Admin Pol. & Proc. # 8115 Conflict of Interest
- Compliance Program Manual- Conflict of Interest
- Admin Pol. & Proc. #5104 General Hospital Bill Collection Policy

VI. Federal & State Regulations

Federal law, including the False Claims Act and the Program Fraud Civil Remedies Act and New York State laws prohibit the knowing submission of false claims or statements to the government for payment. Although they differ in detail, these laws define false claims as "knowingly submitting false or fraudulent claims for payment to the federal or state government or making or using

a false record or statement in connection with the submission of a claim for payment to the government". Violations can subject MSKCC and those involved in the violation to significant fines as well as criminal penalties.

Detailed information about the provisions of the federal False Claims Act, the federal Program Fraud and Civil Remedies Act and New York's civil and criminal state laws pertaining to false claims and statements is available to all employees, agents and contractors. A list of the relevant federal and state regulations and for more information on the DRA is available in the [vendor compliance information](#) section.

VII. Reporting Outside of MSKCC

A person may become a whistleblower and notify the government of known or suspected fraudulent activity at MSKCC. Under both federal and state law, as well as its own internal policy, MSKCC is prohibited from retaliating against persons who notify the government of potential violations. Also, under these statutes, the person who reported the fraudulent behavior may receive a portion of monies recovered or penalties paid in the recovery of false or fraudulent claims.

VIII. Enforcement

Employees acting in violation of this policy are subject to disciplinary action, including possible termination.

Questions

Any staff member with questions about how to implement this policy should contact the Compliance Officer at [646-227-2617](tel:646-227-2617).

PREVIOUS

[Terms and Conditions of Purchase](#)

NEXT

[Federal & State Laws Relating to False Claims & False Statements'](#)

- Connect
 - [Contact us](#)
 - [Locations](#)
- APPOINTMENTS
 - [800-525-2225](#)
 -
 -
 -
 -
 -
- About MSK
 - [About us](#)
 - [Careers](#)

[Giving](#) ■

▼ Cancer Care

[Adult cancer types](#)

[Child & teen cancer types](#)

[Integrative medicine](#)

[Nutrition & cancer](#)

[Find a doctor](#)

▼ Research & Education

[Sloan Kettering Institute](#)

[Gerstner Sloan Kettering Graduate School](#) ■

[Graduate medical education](#)

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