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Roswell Park Cancer Institute Policy and Procedure	Date Issued: 3/1/2000	Number: 126.1
Title: ROSWELL PARK CANCER INSTITUTE CORPORATE COMPLIANCE SUMMARY POLICY	Revision No:	Effective Date: 7/1/2009
Prepared by: General Counsel; Corporate Compliance Officer and Counsel for Risk Management	Approved by: Michael B. Sexton, General Counsel	Page: 1 of 2 

A. GENERAL STATEMENT OF POLICY

It is the policy of Roswell Park Cancer Institute Corporation and Health Research, Inc. (hereinafter referred to as "the Corporation") to comply with all applicable federal, state and local laws and regulations, both civil and criminal, as well as those pertaining to the tax-exempt status of the Corporation.

It is also the policy of the Corporation to require staff to comply with the Roswell Park Cancer Institute Code of Conduct and additional standards of conduct which may be adopted by the Board of Directors, the Chief Executive Officer or the Corporate Compliance Committee.

This policy summarizes the provisions of the Corporation's Corporate Compliance Program and provides information to RPCI staff about important federal and state laws. The provisions, standards and requirements of the program will be reviewed with each new employee and by all employees on an annual basis.

B. SCOPE

This policy applies to all employees, volunteers, contract staff and students associated with Roswell Park Cancer Institute Corporation and HRI.

C. ADMINISTRATION

This policy will be implemented by the Board of Directors and the President & CEO, through the Corporate Compliance Officer, the Corporation's General Counsel and other administrative or managerial staff of the RPCI Corporation.

D. POLICY / PROCEDURE

1. Each employee, agent or medical staff appointee of the Corporation will strive to act in accordance with the provisions of any applicable federal, state and local laws, the Corporate Code of Conduct and Institute policies, and will encourage other employees, agents or medical staff appointees to act the same.
2. No employee, agent or medical staff appointee of the Corporation has authority to act contrary to the provisions of any applicable laws or the Corporate Code of Conduct or to authorize, direct or condone such action by any other employee, agent or medical staff appointee.
3. Any employee, agent or medical staff appointee of the Corporation who has knowledge of activities that he or she believes may violate a law, rule or regulation has an obligation,

promptly after learning of such activities, to report the matter to his or her immediate supervisor, the Compliance Officer, or the Chief Executive Officer. Reports may be made anonymously and employees will not be penalized for reports made in good faith (see also, whistleblower protection laws described in Appendix A). Failure to report known violations, failure to detect violations due to negligence or reckless conduct and intentionally making false reports shall be grounds for disciplinary action, including termination. The appropriate form of discipline will be case-specific, and in accordance with existing collective bargaining agreements.

4. The Corporation will take steps to communicate its standards and procedures to all employees and agents by requiring participation in training programs and by disseminating information that explains in a practical manner what is required. This will include distribution of this policy and the Code of Conduct and maintenance of a Compliance website with informative links and a reporting/inquiry tool.
5. The Corporation will take steps to achieve compliance with its standards by utilizing monitoring and auditing systems reasonably designed to detect misconduct by its employees and agents and by having in place and publicizing a reporting system whereby employees and other agents can report misconduct within the organization without fear of retribution. The Corporate Compliance Hotline (845-3566) is one method of reporting and the Compliance website has a reporting/inquiry e-mail tool for submitting questions or concerns to the Compliance Office.
6. After a suspected violation has been reported, the Corporation through the Compliance Officer will take reasonable steps to respond appropriately and to prevent further similar violations, including any necessary modifications to its program to prevent and detect violations of law.
7. All members of the RPCI and HRI workforce should be knowledgeable about several important federal and state laws that help to prevent and detect waste, fraud and abuse in federal health care programs such as Medicare and Medicaid. In addition, individuals who, in good faith, report suspected non-compliant behavior are protected by both federal and state law. Please see Appendix A to this policy for a description of these laws.
8. This policy is intended to communicate current policies regarding compliance. The Board of Directors reserves the right to change, modify, or waive all provisions herein. If any employee has a question concerning a particular provision contained herein or concerning any practice not addressed in this document, he or she should consult with the Compliance Officer.

E. DISTRIBUTION

This Policy and Procedure will be distributed to all Institute Managers via the RPCI internal web page and to holders of backup hard copies of the manual. Managers are responsible for communicating policy content to pertinent staff.

Attachments

[126-1 appendix A 0410.doc](#)