



Policy #

Department: **Corporate Compliance
(Administration)**

Title: **Communication**

Policy: Communication plays an integral role in Cabrini of Westchester’s (“Cabrini”) Mission which is to focus on elder-care and outreach to the community through compassionate and quality service with an emphasis on justice and respect for all.

Purpose:

Effective communication:

- Builds employee morale, satisfaction and engagement
- Helps employees and other affected individuals to understand the terms and conditions of their employment, residency, treatment, contractual, and Corporate Compliance responsibilities
- Gives employees and other affected individuals a voice, which is a meaningful component of improving employee and Resident/patient satisfaction
- Helps lessen the chances for misunderstandings and potentially reduces grievances and lawsuits; and
- Improves process and procedures, and ultimately creates greater efficiencies and reduces costs.

Procedure: Communication is a two-way process. It involves speaking and listening. Effective listening—making eye contact and dedicating your full attention to the speaker—will help the listener to get full details about the topic of concern, and supports the speaker’s sense of value. The outcome of this is increased loyalty, improved productivity, prompt attention to concerns, and the reduction of issues and concerns before they become grievances, compliance issues and lawsuits.

Responsibility

Action

	Timing:
Compliance Officer	All newly-hired employees receive Corporate Compliance training within 30 days of hire. It is provided by the Compliance Officer (“C.O.”) or her designee. Employees receive a copy of the
Vice Pres. For HR	Corporate Compliance Plan (Code of Conduct) at this time, and are advised of its availability on the shared drive in Cabrini, as
Admitting Office	well as on the Cabrini website.

All Residents receive information concerning the Compliance Plan with their admitting documentation on arrival. This information includes direction to the Cabrini website for those family or friends interested in reviewing the Compliance Plan, which is posted there.

All employees receive Compliance education annually.

Information concerning state and federal “whistleblower” laws is contained within the Employee Handbook. All employees receive a copy of the Handbook upon hire, and when updated.

Ongoing Compliance information is provided to Department Heads, and employees through email, posting at designated employee communication boards (located near timeclocks), through departmental meetings and department head meetings, and text alerts.

Method:

Compliance
Officer or
designee

New employees receive in-person Compliance training provided by the Compliance Officer or her designee. Testing is done at the end of the session to assure an acceptable level of understanding.

Employee

Cabrini has a contract with Relias, an organization specializing in providing comprehensive training to employees and others enrolled in organizations requiring extensive training for their staff. It is an on-line program individualized for each organization. A training plan is arranged on the website with automatic reminders to the learners in the training plan to complete the relevant module(s). Compliance modules are available in both English and Spanish. They may be completed on site or at home, based on the employee’s preference. Examples of Compliance matters to report are provided within the module. Each module has a post-test which must be completed by the learner in order to be credited for completion of the module. The C.O. runs a report at least quarterly to determine the level of participation by employees.

Also, for those employees who are not comfortable using a computer, or who may not have access to one, in-person Compliance education may be conducted by an appropriately trained administrator. Testing is conducted at the end of the session.

Content:

Current Corporate Compliance information is provided with emphasis on the employee's responsibility to report potential or suspected Compliance concerns. Failure to do so will result in disciplinary measures up to and including termination.

Fraud, waste and abuse is defined and examples are given.

Employees are advised that it is illegal for anyone to discriminate, intimidate or retaliate against an employee bringing a good faith Compliance concern to Cabrini's attention. They are advised that they must report any instances of intimidation or retaliation to the C.O.

Employees are told that when reporting a Compliance concern, after a comprehensive investigation has found the concern to be founded, they will receive a letter of commendation to their personnel file. An explanation of the investigation and its findings will be provided to the person reporting the matter when it is not an anonymous report.

Employees and other affected individuals are advised of the methods to report a Compliance concern:

- Telephone hotline: (914)-999-99330 or C.O.s office line: 914-693-6800, ext 571
- Email: scnhcompliance@cabrini-eldercare.org
- In person: Compliance Officer, their supervisor, department head, Vice President, or any member of the Compliance Committee
- In writing: There is no special form. It is felt that requiring a form may impede reporting if the person has to seek out a form, or desires to remain anonymous. Employees are advised that if they wish to report anonymously, they may. They are asked, under this circumstance, to provide as much detailed information about the Compliance concern as possible.

Employees and other affected individuals are advised that their confidentiality is protected when they report a concern. They may be called upon and are expected to participate in an investigation of a potential compliance concern, self-evaluations, audits, and remedial actions.

Employees are advised that they are expected to adhere to state and federal laws, as well as Cabrini's policies and procedures.

They are directed to the Corporate Compliance Plan (Code of Conduct) which is developed to assist them to understand and adhere to these laws, and to understand Cabrini’s fundamental principles and values, and commitment to conduct business in an ethical manner.

18 NYCRR §521-1.4(a)(2)(v)
18 NYCRR §521-1.4(a)(2)(vii)
18 NYCRR §521-1.4(e) and subparts
Title 42 USC § 1396-a(a)(68) [“DRA”]

Approved by:

Title:

Effective March 2023 *Revised Date:*
Date:
