

Citizens Options Unlimited, Inc.
Compliance Program Policies and Procedures

SUBJECT: Compliance Reviews of Clinical Staff Credentials

APPROVED BY: Board of Directors	EFFECTIVE: 5/24/23
Reviewed: 6/5/24, 6/4/25	PAGE 1 OF 2

I. POLICY

Citizens Options Unlimited, Inc. (“Agency”) is committed to ensuring that all Affected Individuals employed by, or who contract with, us have the proper credentials, experience and expertise required to discharge their responsibilities. To this end, Agency is committed to using good faith efforts to not employ or contract with New York physicians/practitioners or licensed professionals who are not currently licensed and registered with the State (or who do not have the required credentials).

II. PROCEDURES

In order to ensure compliance with the above Policy Statement, Agency will, at minimum, take the following actions:

A. New Employees/Contractors. Before hiring or retaining any physician/ practitioner or other licensed professional, the Human Resources Compliance & Credentialing department will appropriately query available websites, including, but not limited to (as applicable):

- <https://www.op.nysesd.gov/verification-search>

(links to the NY State Education Department’s web page for license or certification verification and disciplinary action against professional license);

- <http://www.health.ny.gov/professionals/doctors/conduct/>

(links to the NY Office of Professional Medical Conduct’s webpage for disciplinary action against Physicians and Physician Assistants);

Other available information or resources may also be used from time-to-time, as necessary and appropriate.

B. Annual Reviews. Appropriate website searches (and/or searches/diligence of other appropriate information or resources) will be performed no less than annually on all Affected Individuals then employed by, or contracted with, Agency.

In addition, Agency will require each current physician/practitioner or licensed professional to certify that: (a) he or she has not been convicted of a crime; and (b) that

their New York State license and registration (or other required credentials) to practice their profession are current.

C. Corrective Action. Should Agency determine that: (a) any Affected Individual is or has been convicted of a crime; or (b) that an Affected Individual's New York State license and/or registration (or other required credentials) is not current, then the following action will be taken:

- First, the HR Compliance & Credentialing Manager and the Agency Compliance Officer will be immediately notified.
- Second, if the determination relates to an Affected Individual that has an existing relationship with Agency, the Affected Individual will be immediately suspended from providing any services to, or on behalf of, Agency (including, but not limited to, patient care services) pending the outcome of the investigation provided for below. In addition, any billing by, or related directly or indirectly to, that individual will be immediately suspended.
- Third, an investigation of the matter will be immediately undertaken (with the assistance of compliance counsel, as necessary), and appropriate corrective and disciplinary action will be promptly implemented in accordance with our Compliance Program (including, but not necessarily limited to, and as appropriate the return of monies improperly received and the termination of the relationship).
- Fourth, if the determination relates to an Affected Individual that does not have an existing relationship with Agency, that person will not be hired or retained, or otherwise become affiliated with Agency.

2. **Documentation Retention.** Records of the above reviews and any investigations, corrective action and/or disciplinary action taken will be maintained in the Affected Individual's personnel file or in another appropriate file for at least ten (10) years.