

Statement of Findings  
New York Quality HealthCare Corporation Behavioral Health Key Staff Review  
Survey ID# 691627544  
October 1, 2020-February 26, 2021

**Plan of Correction with Timetable:**

New York Quality HealthCare Corporation d/b/a Fidelis Care (or Fidelis) will take the following actions:

**Step 1 Update and distribute Transition of Key Persons Policy:**

Fidelis will update the existing policy 'Notification of Key Person Transition' reference number CC.CompLegal.21 to include the requirements specific to requirements pertaining to notification of key adult and children's behavioral health staff positions that become vacant or changed.

The specific requirements included in the update include the definition of all key behavioral health staff roles subject to notification and describes the process in which the leaders of those key staff, in addition to the Human Resources leadership team, are responsible for notifying the VP of Compliance of the key staff person's resignation / termination. The policy also describes that the notice of staff change must be sent to the [BHO@omh.ny.gov](mailto:BHO@omh.ny.gov) mailbox as well as the [OASAS.SM.BehavioralHealthMMC@oasas.ny.gov](mailto:OASAS.SM.BehavioralHealthMMC@oasas.ny.gov) within 7 calendar days.

**Timeline:**

- Policy under review and update to be completed by 1/28/2022
- Policy distributed to CEO and Direct Reports by 1/28/2022
- Policy distributed to key support staff, including Compliance, by 1/28/2022

**Responsible Persons:**

Frances Rao, VP of Compliance, will be responsible for creating and distributing the policy cited above to support this plan of correction.

Santo Russo, Chief Legal Officer, and Frances Rao, VP of Compliance, will be responsible for identifying transitions and notifying the DOH according to the attached policy.

**Step 2 Monitor adherence to the Transition of Key Persons Policy:**

To ensure adherence to this Policy, the Plan will review the status and results of this POC at the internal Monthly Compliance Operations meeting until such a time that the results have been sustained for a three (3) month period. Periodic audits will be considered as part of the Plan's compliance monitoring and audit plan.

**Timeline:**

- Review of this POC will be included at the Monthly Compliance Operations meeting beginning January 2022.
- Review of this POC will be included at the Monthly Compliance Operations meetings until adherence is demonstrated for three (3) consecutive months.

**Responsible Persons:**

Frances Rao, VP of Compliance, and Joseph Sorbello, Director of Compliance, will be responsible for presenting this POC at the Monthly Compliance Operations meeting.

Signature: 

Date: February 2, 2022