

ARISE Child and Family Service
Quality Improvement

Policy Name: Corporate Compliance Policy
Policy Topic: Corporate Compliance
Policy Number: 13.5.100

Policy

For the purposes of this policy, "ARISE" is defined as the consolidating entity which includes ARISE Child and Family Service, Inc., together with any and all subsidiary corporations. "Agents" is defined as all applicants, employees, board of directors, interns, volunteers, vendors, and contractors. All agents of ARISE are responsible for following the ARISE Corporate Compliance Program (including the Corporate Compliance Plan and Code of Conduct), the Federal False Claims Act, and the New York False Claims Act. The purpose of the Federal False Claims Act is to impose liability on persons and companies who defraud government programs. The purpose of the New York False Claims Act is to establish a cause of action for false claims of payment or approval submitted to New York State or local government.

The Corporate Compliance Program at ARISE puts into place a formal set of organizational systems intended to promote activities that are completely consistent with the integrity that ARISE values. The program is designed to prevent, detect, and respond to misconduct committed by employees or other agents. Failure to follow the Corporate Compliance Program can result in corrective action up to and including termination, or other appropriate actions including the discontinuance of relationship, as well as civil and/or criminal penalties, including but not limited to fines (up to \$20,000 per claim) and imprisonment.

Corporate Compliance Program Guidance is based upon Federal Guidelines and a formal commitment by the governing body of ARISE. These elements are:

1. Written standards of conduct.
2. Designation of a Corporate Compliance Officer (CCO) who reports to the Chief Executive Officer (CEO) and the governing body.
3. Corporate Compliance Committee with oversight and monitoring of the compliance program, and that supports the CCO.
4. Regular and effective training programs for all agents of ARISE.
5. A hotline and/or other processes to file complaints, and procedures to protect the anonymity of complainants. This includes a written policy protecting those who report suspected misconduct or concerning practices (13.5.110).
6. A system to respond to allegations of improper/illegal activities and enforce corrective action against employees who violate internal compliance policies, regulations, and/or program requirements.

The values of the Corporate Compliance Plan are in direct correlation with our mission “to work with people of all abilities to create a fair and just community in which everyone can fully participate.” As part of corporate compliance, ARISE stresses the values of integrity, ethics, commitment to quality of care, confidentiality, fairness, diligence, and open communication.

The Corporate Compliance Plan is the comprehensive guide to the procedures at ARISE, and is intended to use proactive measures in the prevention and detection of misconduct. The plan is also designed to discover and correct our weaknesses and mistakes in order that we demonstrate diligence, without the need for an outside or governmental reviewer to call these matters to our attention. We stress ‘protection’ under the False Claims Act and Whistleblower Provisions policy (13.5.110) and encourage all ARISE agents to come forward without doubt or fear.

It is the responsibility of the CCO to develop an effective improvement plan and to assure that we investigate any allegations of misconduct in corporate compliance matters in accordance with the Investigation of Compliance Issues Policy (13.5.107).

We believe in monitoring ourselves and value the importance of internal auditing and using the findings as a way to assure the safety for individuals served, regulatory compliance, and financial health.

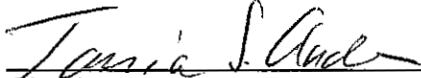
The Corporate Compliance Plan uses proactive measures in the prevention and detection of misconduct. The core elements, defined and managed by the Corporate Compliance Plan and Code of Conduct, are as follows:

1. Billing and False Claims
2. Client Rights
3. Confidentiality and Privacy (HIPAA)
4. Conflicts of Interest
5. Professional Licensure, Certification, and Credentialing
6. Fraud and Abuse
7. Gifts, Gratuities, and Entertainment
8. Intellectual Property and Internal Systems
9. Record Retention, Completion, and Maintenance
10. Reporting Requirements
11. Reviews and Inspections

Procedure

Person(s) Responsible	Action
Chief Executive Officer (CEO)	<p>Appoint the Corporate Compliance Committee.</p> <p>Oversee the CCO.</p>

Corporate Compliance Officer (CCO)	<p>Oversee and enforce the Corporate Compliance Plan and Code of Conduct.</p> <p>Ensure initial and on-going corporate compliance training is completed for all ARISE agents.</p> <p>Report to CEO and Governing Body on all Corporate Compliance matters.</p>
All ARISE Employees / Agents	<p>Complete initial and annual corporate compliance trainings.</p> <p>Acknowledge receipt and understanding of all Corporate Compliance policies, the Corporate Compliance Plan, and the Corporate Compliance Code of Conduct.</p> <p>Immediately report any knowledge or concerns about potentially illegal or fraudulent activities to a supervisor, directly to the CCO, and/or via the ARISE Corporate Compliance Hotline (315-671-4645).</p>
Corporate Compliance Committee	See policy #13.5.109

 Chief Executive Officer	<u>11/29/2021</u> Date
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Date:

Revised Date:

Reference: NYS Social Services Law Article 363-d; 18 NYCRR 521; Public Health Law; Federal False Claims Act 31; New York False Claims Act (Article 13, Article 187); Deficit Reduction Act of 2005; Centers for Medicare and Medicaid Services; NYS Department of Health; Office of the Inspector General; Office of the Medicaid Inspector General; Federal Sentencing Guidelines

Divisional policies and procedures, as well as agency-wide policies, have also been established to outline compliance standards and practices and must be followed, as appropriate, by all ARISE employees.