

**The Arc of Madison Cortland
Corporate Compliance Plan**

Compliance Line

Date of First Issue: May 2005

Date of Last Revision: Jan 2009, Jan 2015

I. POLICY

The Arc of Madison Cortland encourages an organizational culture in which all employees feel a duty to report behaviors or actions which they believe are not compliant with the laws and regulations that govern our work. The effectiveness of our Compliance Program depends on the willingness of employees to step forward, in good faith, with questions and concerns.

We believe, in all cases, that resolution of the problem behaviors or actions will result in better care for the individuals we support. Therefore, each person reporting problems or concerns will be contributing positively to the overall quality of our services.

II. RESPONSIBLE PARTIES

Every Employee:

- 1) Is responsible for doing their job in an ethical manner and complying with the laws and regulations that govern their work.
- 2) Has an affirmative duty to the Chapter and to its' stakeholders to report actions or behaviors believed to violate the Code of Conduct and the Compliance Program.
- 3) Is responsible to seek supervisory assistance to determine the right course of action, if appropriate.
- 4) Should feel free to report a concern directly to the Compliance Line or the CO when it is believed that the supervisor may be incorrect in their advice, or, he/she wishes for any reason to not approach their supervisor.
- 5) Is responsible to report issues and concerns in good faith.

The Chapter will:

- 1) Take each reported issue seriously.
- 2) Investigate each report, when there is sufficient information given, to determine the problem and corrective action.
- 3) Ensure that employees who report are not retaliated against for their good faith reports or questions.
- 4) Implement disciplinary action up to and including termination if an issue and/or concern are not found to have been reported in good faith.
- 5) Maintain confidentiality, when requested, of all those who report.

- 6) Provide a variety of options, in addition to the hotline, in which to report questionable behavior or ask compliance related questions.
- 7) Have an agreed upon method for determining the status of their report where possible.

III. PROCEDURES

Employees may report:

- 1) Directly through the hotline number or website. This line will be answered only by outsourced Compliance Hotline individuals who directly report all inquiries to the Compliance Officer. This method offers anonymity.
- 2) Via voice mail, email, U.S. mail, or face-to-face to an employee's supervisor or the CO or his/her designee).

IV. CONFIDENTIALITY AND RETALIATION

To the extent possible, all reports will be handled in a confidential manner, if requested. Employees should understand that requesting anonymity *may hinder the quality of the investigation process.*

If an employee wishes to disclose his/her identity, it will be held in confidence to the fullest extent practical or allowed by law.

Each employee may contact the Compliance Officer, Director of Human Resources or Compliance Line to report any actions believed to be retaliatory. An employee found to have engaged in any act of retaliation or any form of harassment against an employee who reports a compliance concern will be subject to disciplinary action up to and including termination.

The Arc of Madison Cortland Compliance Hotline

1-800-401-8004



- ◆ Do you know of a situation that is wrong, illegal, unethical or unsafe?
- ◆ Have you spoken to your supervisor or director and nothing has changed?
- ◆ Do you have a question about regulations?

Be part of the solution by doing the right thing!

Call The Arc of Madison Cortland Compliance Hotline number today.

Messages can be left 24 hours a day, 365 days a year.

Your call will be confidential.

Don't want to use the phone?

Use the notification form at www.lighthouse-services.com/arcofmc

Or mail your concern to the Compliance Officer, 701 Lenox Avenue, Oneida, NY 13421



If it concerns you,
it concerns us!

Retaliation is against agency policy when issues are reported in good faith.