

<b>TOPIC:</b> Corporate Compliance	<b>DEPARTMENT:</b> Quality Assurance/Corporate Compliance
<b>POLICY NAME:</b> Corporate Compliance Officer	<b>POLICY NUMBER:</b> 7.3.3
<p><b>PURPOSE:</b> To monitor the functional components of and oversee the day-to day operations of the Corporate Compliance Program.</p> <p><b>REFERENCE(S):</b> 18NYCRR Part 521</p> <p><b>DEFINITION(S):</b> None</p> <p><b>POLICY:</b> The Corporate Compliance Officer shall be responsible for the day-to-day operation of the Compliance Program and shall foster an environment of compliance. The Corporate Compliance Officer shall oversee and monitor the development and implementation of the OI/ARC’s compliance policies, the achievement and maintenance of compliance standards, including audits, training, and the investigation and response to employee compliance complaints/reports. The Corporate Compliance Officer is directly responsible to the Executive Director, and, as necessary, to the Board of Directors. The Corporate Compliance Officer shall supervise all compliance staff. The Compliance Officer has the authority to review all documents and other information relevant to compliance activities, including but not limited to work product and records concerning the OI/ARC’s arrangements with independent contractors, governmental agencies, third party payors, suppliers and agents. The Compliance Officer is vested with full authority to stop work on a project that is believed to be problematic until such time as the issue in question has been resolved.</p> <p>The duties of the Corporate Compliance Officer shall include, but not be limited to, the following:</p> <p><b>Maintenance and Improvement of the Written Standards and Policies:</b> The Corporate Compliance Officer shall develop, oversee and monitor implementation of the written Corporate Compliance Plan, including the Code of Conduct and related policies and procedures and will recommend changes to or the development of new written documentation to support the Corporate Compliance Plan.</p> <p><b>Liaison to the Board, the Compliance Committee, Management and Employees:</b> The Corporate Compliance Officer shall personally appear before the Board to report the results of all corrective actions and investigations to the Quality Assurance/Corporate Compliance Committee and the Board of Directors on a monthly basis. All ‘major’ compliance risks are also to be reported in a timely manner to the management team.</p> <p><b>Background/Exclusion Checks:</b> The Corporate Compliance Officer will work with the Director of Human Resources to ensure that OI/ARC does not hire or contract with an individual or entity who has been excluded or debarred from participation in Federal and state health programs, including Medicaid, in accordance with the policies and procedures established by the Director of Human Resources and the Corporate Compliance Policies on Background Checks and Exclusion Checks.</p> <p><b>Education and Training:</b> The Corporate Compliance Officer is responsible for overseeing the development of training and for ensuring that these trainings are conducted in accordance with the Corporate Compliance Policy and training requirements.</p> <p><b>Audit Responsibilities:</b> The Corporate Compliance Officer shall be responsible for overseeing compliance audits conducted by either internal staff and outside consultants. Internal auditing shall be conducted in accordance with the Corporate Compliance Policy on Internal Auditing and Monitoring.</p>	

**Investigations and Receipt of Complaints and Concerns:** The Corporate Compliance Officer will pursue and promptly investigate any employee concerns or complaints received via the Corporate Compliance Hotline or other methods of reporting, as detailed in the Corporate Compliance Policy on Internal Reporting and Investigations.

**Discipline/Enforcement of the Corporate Compliance Plan:** The Corporate Compliance Officer shall be responsible to ensure that OI/ARC imposes appropriate sanctions against an individual employee or independent contractor for failure to comply with the Corporate Compliance Plan, the Code of Conduct and/or laws and regulations applicable to OI/ARC.

**Disclosure and Internal/External Corrective Action:** The Corporate Compliance Officer shall coordinate and oversee the detecting, correcting and preventing non-compliance behaviors.

**Approved by Executive Director/CEO:**

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Signature	Mike Szpak	Date
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