



2018 Board of Directors Corporate Compliance Training

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Corporate compliance officer
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Incident Management

Overview – Incident Management Process

Staff Training

- Identification of Incidents, Praise
- Supervisor Training
- Therap Training
- Investigator training
- Annual Refresher



Investigatory Process

- Reporting- GER
- Notifications
- Investigating
- IRMA/WSIR
- Reviewing and Monitoring
 - Incident Review Committee



2017 Agency Trends

- Agency Trend report distributed
- Changes in staffing of the QA Department
- Increase in Internal reports at OI
- Decrease in Internal reports at Arc
- Slight decrease in reportable incidents (OI)
- Slight increase in reportable incidents (Arc)
- Most 625 reports involved Child or Adult Protective Services

OMIG's Mandatory Corporate Compliance Program

- **SSL § 363-d; 18 NYCRR Part 521**
 - The purpose of this program is “to enhance the integrity of the NYS Medicaid program by preventing and detecting fraudulent, abusive, and wasteful practices within the Medicaid program and recovering improperly expended Medicaid funds while promoting high-quality patient care.”
 - The do's and don'ts for Medicaid providers.
 - The compliance program supports providers in self-assessment and self-correction.
 - Identify and resolve billing discrepancies and detect potential fraud.
 - Systemic checks and balances that would mitigate noncompliance.

Corporate Compliance Program

8 required elements

- **1: Corporate Compliance Plan – Policies and Procedures**
- **2: Compliance Program Structure and Oversight Responsibilities**
- **3: Training & Education**
- **4: Communication lines to the responsible compliance position**
- **5: Auditing and Reporting**
- **6: Disciplinary Action**
- **7: Detection and Response**
- **8: Non-intimidation, Non-retaliation**

Work Plan

Monthly QA/Corporate Compliance Committee

Board Responsibilities

- Establish a Path
 - Ensure that all activities support the agencies mission, values, Code of Ethics & Code of Conduct.
 - Ensure that the agency is looking to the future
 - Enhance the agencies public image
 - Serve as a “Court of Appeal”
 - Support Structure and Accountability
 - Review and Modify policies related to service delivery, personnel, fiscal management, and incident reporting.

Board Responsibilities

- Executive Oversight
 - Selection of the Executive Director
 - Support the Executive Director
 - Review performance of ED
 - Maintain Communication with the ED and Senior Leadership Team
- Commitment to the public good;
 - **Accountability** to the public;
 - **Commitment** beyond the law;
 - Respect for the worth and **dignity** of people supported by the agency;
 - Inclusiveness and social **justice**;
 - **Respect** for pluralism and diversity;
 - Transparency, integrity and **honesty**;
 - Responsible **stewardship** of resources;
 - Commitment to excellence and to maintaining the public **trust**;
 - And above all....**Placing the interests of the people we support above the interests of the agency.**

Board of Directors & Accountability

- Ensure individual protection and program compliance with regulatory requirements.
- Develop standing committees to address specific concerns as well as technical matters.
- Develop and review annual program evaluations (be proactive).
- Ensure adequate resources are available and make provisions and policy for the financial stability and accountability of the Chapter.
- Board members/officers are held to ethical duties (principles) and standards.



Ethical Duties



Duty of Care

- You must inform yourself of relevant facts and issues. You can rely on managers, committees and hired professionals unless you have reason not to.

Duty of Loyalty

- You must look for, identify, and deal appropriately with conflicts of interest and support majority decisions of the Board. Reveal and recuse yourself, if necessary.

Duty of Obedience

- You must operate the Agency in a manner consistent with its purpose, regardless of profit loss.

Conflict of Interest & Duty of Loyalty



*"I'm afraid I can't treat you, Mr. Fisk.
I have a conflict of interest."*

Accomplishments

- Council for Quality Leadership Accreditation
- Establishment of new programs
 - Community Habilitation
 - Intensive Behavior Support Services
- Internal/External Audits
 - BPC
 - Source America
 - Survey Results

Goals

- Promoting a Culture of Constant Communication
- Chipping away at Policies and Procedures
- Specialized trainings continue
- Safety & Safe Patient Handling
- Annual compliance survey

Related Resources

- <https://www.omig.ny.gov/>
- <https://www.charitiesnys.com>
- <http://www.ag.ny.gov/>
- <https://www.justicecenter.ny.gov/>
- http://www.opwdd.ny.gov/opwdd_resources/incident_management/home

Code of Conduct

Please review the Code of Conduct
and sign off on the Acknowledgement Form



Thank you!



For a suspected compliance violation, report using one of the following:

- Completing an online submission form:
<http://oswegoindustriesinc.org/corporate-compliance>
<http://www.arcofoswegocounty.org/corporate-compliance/>
- Corporate Compliance Officer desk phone **315-598-3108 Ext. 223**
- Compliance Hotline **315-887-5950** (**Anonymous option*)
- Locked Compliance drop box

Questions?