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## [Policy Number]: Corporate Compliance Structure

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Category: Corporate Compliance      Effective Date: XXXXXXXX  
Department: XXXXXXXXXXXXXXXXXXXXXXXX      Last Revision Date(s): 6/18/2020

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### POLICY STATEMENT

The [Chapter] is committed to establishing and maintaining high standards of ethical conduct related to its business and operational practices. This policy establishes an independent Corporate Compliance Program that will serve as the basis on which a strong corporate culture of compliance to laws and regulations can rest. The [Chapter] delegates responsibility and authority to the Compliance Officer and the Corporate Compliance Committee for the oversight of implementation and operation of the Corporate Compliance Program.

The purpose of this policy is to define the functional components of the Corporate Compliance Program to include the Compliance Officer and the Corporate Compliance Committee, and their related responsibilities established within the Corporate Compliance Program of the [Chapter] as well as the collaborative role of the Arc New York.

### PROCEDURE

#### A: Designations

- 1) **The Compliance Officer (or designated employee)** shall be responsible for the day-to-day operation of the Compliance Program and shall foster an environment of compliance. The Compliance Officer shall oversee and monitor the development and implementation of the [Chapter's] compliance policies (utilizing the assistance of The Arc New York's compliance resources when appropriate), the achievement and maintenance of compliance standards, including audits, training, and the investigation and response to employee compliance complaints/reports. The Compliance Officer is directly responsible to the Executive Director or to an appropriately-designated senior administrator and, as necessary, to



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the Board of Directors. [The Compliance Officer shall supervise all compliance staff.]

- 2) **The Corporate Compliance committee** shall serve as a resource for the Corporate Compliance Officer. The Corporate Compliance Committee shall continually foster a culture of compliance within the [Chapter] at every level and in every department.
- 3) **The Board of Directors** shall receive and respond to reports of the Compliance Officer and the Corporate Compliance Committee and shall be responsible for the effective implementation of the [Chapter] Corporate Compliance Plan. The Board shall be responsible for taking any disciplinary actions of its own members relating to violations of law, regulations or [Chapter] policies and procedures, including the Corporate Compliance Plan.

### B: Functions

#### 1) The Compliance Officer

##### a. Duties of the Compliance Officer

The [Chapter] maintains a separate Job Description for the Compliance Officer located at **Exhibit A**. In addition to the duties described in the Job Description, the duties of the Corporate Compliance Officer shall include, but not be limited to, the following:

**Maintenance and Improvement of the Written Standards and Policies:** The Compliance Officer shall develop, oversee and monitor implementation of the written Corporate Compliance



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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. The [Corporate Compliance Policy on Policy Development] shall provide the procedural basis for new policies to be developed. The Compliance Officer will be responsible to collaborate with and effectively utilize the resources of The Arc New York's Associate Executive Director for Quality, Compliance and Chapter Relations to stay informed of the latest regulatory developments applicable to the [Chapter's] operations and to develop new policies to address these changes.

**Liaison to the Board, the Compliance Committee and [Chapter] Management and Employees:** The Compliance Officer shall personally appear before the Board to report the results of all corrective actions and investigations to the Compliance Committee and the Board of Directors on a [\_\_\_\_\_, but no less than annual] basis. All 'major' compliance risks are also to be reported in a timely manner to the [Executive Director] and/or the [Relevant members of senior leadership as dictated by the Chapter] under the advice of [Inside Counsel/Outside Counsel]. As determined to be necessary by the foregoing individuals, the Board will be notified of emergent compliance issues.

On at least a quarterly basis, the Compliance Officer will prepare and submit to the Board of Directors a written report on the operation of the Compliance Program during the preceding quarter. The report to the Board of Directors shall address the current status of the compliance program such as:

- A summary of allegations of possible non-compliance submitted to the Compliance Officer, including a report that



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details the following: nature of complaint, assessment of risk, current status of the report, whether an existing procedural system or operational policy is involved, and whether the complaint was referred to outside counsel.

- A summary of every instance in which discipline was imposed for a violation of the Compliance Program.
- An evaluation of how effectively the disciplinary processes functioned in supporting and strengthening the Compliance Program.
- The results of internal audits and benchmarking surveys conducted during the period of time with a discussion of the progress, or lack of progress, such results indicate.
- All training sessions performed and a discussion of the effectiveness of the training programs as indicated by comprehension quiz results.
- Recommendations for improvements to be made to the Compliance Program.

The Compliance Officer will present to the Board in an Executive Session at least \_\_\_\_ annually and more frequently as needed.

**Liaison with the NYSARC Board of Governors:** The Compliance Officer is responsible for facilitating cooperation with The Arc New York's Associate Executive Director for Quality, Compliance and Chapter Relations in periodic reviews of the [Chapter's] Corporate Compliance Program, and working cooperatively with



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The Arc New York's Associate Executive Director for Quality, Compliance and Chapter Relations to implement any corrective actions required by the NYSARC Board of Governors to improve the effectiveness of the [Chapter's] Corporate Compliance Program.

**Background/Exclusion Checks:** The Compliance Officer will work the Human Resources Department to ensure that the [Chapter] 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 Human Resources Department and the [Corporate Compliance Policies on Background Checks and Exclusion Checks].

**Education and Training:** The Corporate Compliance Officer is responsible for overseeing the development of training seminars and for ensuring that these seminars are conducted in accordance with the [Corporate Compliance Policy on Education and Training of Employees or Others]. The Compliance Officer will be a resourceful leader regarding the implementation of the Corporate Compliance Plan and will assist employees to interpret and follow the Plan.

**Audit Responsibilities:** The Compliance Officer shall be responsible for overseeing compliance audits conducted by either internal staff and outside consultants. As directed by the Compliance Officer or as detailed in the Policy, [Chapter] managers and employees will assist with the audits.



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**Investigations and Receipt of Complaints and Concerns:** The 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 Investigations]. The Compliance Officer shall document all compliance complaints or reports brought by the Board, by employees, by independent contractors or by clients, as provided in the [Corporate Compliance Policy on Documentation of Compliance Activities].

**Discipline/Enforcement of the Corporate Compliance Plan:** The Compliance Officer shall be responsible to ensure that the [Chapter] 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 the [Chapter]. The Compliance Officer shall also evaluate whether misconduct is based on a lack of awareness or understanding of a regulatory obligation, policy or procedure and shall institute a program of education and training of staff, as needed. Disciplinary action shall be taken in accordance with the [Corporate Compliance Policy on the Discipline and Enforcement Program].

**Disclosure and Internal/External Corrective Action:** The Compliance Officer shall coordinate and oversee the detecting, correcting and preventing of non-compliance behaviors. When an internal investigation or report results in the identification of a violation of law, regulations or a [Chapter] policy or procedure, the Compliance Officer shall be responsible to work, as necessary, with the Board of Directors, the [Executive Director], [Inside Counsel and/or Outside Counsel], the Corporate Compliance Committee and the management team to (a) ensure that the



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[Chapter] follows the [Corporate Compliance Policy on Detecting and Responding to Violations; Voluntary Disclosures] and conducts the appropriate corrective action, such as making prompt restitution of any overpayment amounts, notifying the appropriate governmental agency and instituting whatever disciplinary action is necessary. The Compliance Officer must also ensure that the [Chapter] identifies and implements systemic changes to prevent a similar violation from recurring in the future.

### **b. Oversight Authorization of the Compliance Officer**

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 [Chapter'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.

The Compliance Officer is authorized to engage in disciplinary actions of employees and independent contractors in accordance with the [Corporate Compliance Policy on the Discipline and Enforcement Program].

## 2) The Corporate Compliance Committee



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### a. Composition and Governance

**Membership:** The Corporate Compliance Committee shall be appointed by the [Board; the Executive Director] and will be comprised of not less than [eight (8)] individuals representing [Chapter] leadership and key departments, including but not limited to: [the Executive Director, the Chief Financial Officer, the Director of Human Resources, the Director of Reimbursement, the Director of Clinical/Rehabilitation Services, the General Counsel]. The composition of the Corporate Compliance Committee shall include at least three (3) directors of the chapter, two (2) of whom should be non-executive directors, free from any relationship that would interfere with the exercise of his or her independent judgment. The Corporate Compliance Committee shall designate a Chairperson who shall serve in such capacity for no less than one year.

**Meetings:** Meeting dates, times and locations will be set by the Chair of the Corporate Compliance Committee; however, the Committee will meet not less than once per quarter of the calendar year and may meet more often as deemed necessary by the Chair or by a majority of the Committee. The Corporate Compliance Committee may invite non-members to meet with the Committee. The Chairperson of the Corporate Compliance Committee shall communicate with the members of the Committee between meetings to inform the members of significant developments or to solicit input.

**Agenda:** The agenda for regular meetings will be set by the Chair and all members will be entitled to add items to the agenda of





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regular and called meetings as they deem appropriate. Agenda items should include the following: [status of implementation of Corporate Compliance Plan; potential compliance violations that have been detected; investigations and responses to reported offenses; identification of risk areas and plans for risk reduction; internal, prospective audit reports; evaluation of Corporate Compliance Plan].

**Action:** Actions of the Corporate Compliance Committee will require approval by a majority of the members, either by verbal or written consent. Members are not required to be physically present in the same location in order for the Corporate Compliance Committee to act and actions may be taken by telephone conferences, by written communications or by other means of communication.

**Minutes:** The Corporate Compliance Committee will maintain written minutes of meetings and actions. The minutes will be made available to members of the Board of Directors upon request. The Corporate Compliance Committee may appoint a non-member to act as secretary and to prepare minutes of the meetings. Minutes will be archived by the Compliance Officer and retained indefinitely.

**Confidentiality:** The Corporate Compliance Committee will have access to sensitive information regarding the operations of the [Chapter]. Each member shall take appropriate steps to safeguard this information from accidental or intentional disclosure and may be required to return or destroy documents related to matters discussed by the Corporate Compliance Committee.



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### b. Duties of the Corporate Compliance Committee

**Maintenance and Improvement of the Written Standards and Policies:** The Corporate Compliance Committee will review the effectiveness of the Corporate Compliance Plan on an [annual] basis and will offer recommendations for improving and strengthening the [Chapter's] policies, procedures and commitment to compliance through the Corporate Compliance Plan. The Corporate Compliance Committee will oversee and approve the continuing development and implementation of policies, procedures, directions, guidelines and communications that establish compliance standards and further the objectives of the Corporate Compliance Program. Members of the Corporate Compliance Committee will analyze the regulatory environment and legal requirements with which the Company must comply, and specific risk areas for the Company. The Corporate Compliance Committee will utilize The Arc New York's Associate Executive Director for Quality, Compliance and Chapter Relations when appropriate in the development of standards and policies.

**Liaison to the Board and [Chapter] Management:** The Corporate Compliance Committee shall regularly communicate with the Board. The Corporate Compliance Committee is responsible to receive reports from the Compliance Officer or from The Arc New York's Board of Governors concerning or related to the operation of the compliance program such as issues related to training and education, hotline reports/disclosures of wrongdoing, potential or existing government investigations or litigation, internal and external audits, and compliance risk assessment. The Corporate



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Compliance Committee will provide support and feedback to the Compliance Officer and others and will provide strategic direction for the Corporate Compliance Plan.

**Auditing:** The Corporate Compliance Committee shall recommend and monitor in conjunction with the relevant departments, the development of internal systems and controls to carry out the Company's standards, policies, and procedures as part of daily operations. The Corporate Compliance Committee shall evaluate internal and external audits and investigations for the purpose of identifying troublesome issues and deficient areas, and implementing corrective and preventive action.

**Investigations and Receipt of Complaints and Concerns:** The Corporate Compliance Committee shall ensure that the Compliance Officer has appropriate independence and support for the Corporate Compliance Program for investigations and matters related to compliance issues. The Corporate Compliance Committee shall receive reports related to investigations and complaints under the Corporate Compliance Plan.

**Discipline/Enforcement of the Corporate Compliance Plan:** The Corporate Compliance Committee shall support the Corporate Compliance Officer and other management to impose appropriate sanctions for violations of law, regulations and [Chapter] policies and procedures, including the Corporate Compliance Plan. The Corporate Compliance Committee shall advise on whether additional training and education may be needed based on particular areas of risk that arise.



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**Disclosure and Internal/External Corrective Action:** The Corporate Compliance Committee shall provide input into any corrective action plan developed by the [Chapter], including self-disclosure to a governmental agency. The Corporate Compliance Committee shall also assist the Compliance Officer to identify and implement changes to day-to-day policies and procedures to prevent future violations of similar laws, regulations and policies.

### c. Oversight Authorization of the Corporate Compliance Committee

The Corporate Compliance Committee shall have the authority to retain outside counsel and independent consultants, as needed, and shall be empowered to assure that appropriate allocation of resources for support of and effective implementation of the Corporate Compliance Program is made available by the [Chapter], including but not limited to funding for internal auditing and monitoring of the effectiveness of the Plan.

#### C: Additional Activities

- 1) **Annual Workplan:** The Compliance Officer shall be responsible to prepare an annual workplan for the [Chapter] to follow to address key areas of risk. The Compliance Officer will update and report progress on an annual basis. The Compliance Committee shall approve and assist the Compliance Officer to achieve the goals of the workplan.
  
- 2) **Fostering a Culture of Compliance:** The Compliance Officer, the Compliance Committee and the Board of Directors are responsible to foster a culture of compliance supported by the effective



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implementation of the Corporate Compliance Plan. Sample Statements of Commitment to Compliance are attached for distribution to employees and others at Exhibit B.

### List of Exhibits:

- Exhibit A - Job Description for Corporate Compliance Officer
- Exhibit B - Statements of Commitment to Compliance



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### Exhibit A

## [CHAPTER] COMPLIANCE OFFICER Job Description

### POSITION SUMMARY:

The Chapter Compliance Officer (CCO) has primary responsibility for developing, overseeing and monitoring the corporate compliance program of a Chapter, with the assistance of The Arc New York's Associate Executive Director for Quality, Compliance and Chapter Relations (Arc NY AED). The CCO is responsible for ensuring that the Chapter has adopted a comprehensive and effective compliance program; for maintaining and expanding visibility for the compliance program through effective education and training programs at all levels; for acting as the liaison for the Chapter Compliance Committee, including managing the agenda and arranging for ongoing meetings; for recommending compliance initiatives appropriate to the Chapter's business model and the current health care regulatory environment; for overseeing the compliance hotline, and periodically evaluating and working cooperatively with the Arc NY AED in evaluating compliance processes for effectiveness, and implementing improvements and adjustments.

### REPORTING RELATIONSHIP:

The CCO reports to and has direct access to the Chapter's Board of Directors and the Compliance Committee for purposes of advising and making recommendations about compliance processes and issues. Additionally, the CCO is responsible for collaboration with the Arc NY AED and responding to the Arc NY AED's requests for information in connection with periodic effectiveness reviews.



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### **PRIMARY DUTIES:**

1.      Oversee and monitor the implementation of the Chapter's compliance program.
2.      Develop (or adopt the Arc New York's model CCP), evaluate, revise and make available to the Chapter a written compliance program, including policies and procedures designed to prevent illegal, unethical or improper activities, survey instruments, and other tools and forms.
3.      Ensure the non-employment or non-retention of excluded individuals or entities.
4.      Advise the Chapter and its Board with respect to the implementation and/or operation of an effective compliance program.
5.      Maintain a working knowledge of and function as a Chapter resource on federal and state laws, regulations and policies that may affect the Chapter and influence its compliance program.
6.      Create and implement, with input from Chapter staff, the Arc NY AED and outside resources, a standardized training curriculum and training tools.
7.      Ensure that employees have received, read and understood the Chapter's standards of conduct.
8.      Train the Chapter's Board, Officers and employees, including senior management, regarding the Chapter's compliance program.
9.      Monitor the compliance activities of the Chapter to remain abreast of compliance activities and to identify trends.
10.     Identify potential areas of compliance vulnerability and risk, develop and oversee implementation of corrective action plans for the resolution of problematic issues and provide general guidance to the Chapter on how to avoid or deal with similar situations in the future.
11.     Continually monitor the effectiveness of the compliance program and identify problem areas using a variety of methods, including conducting routine and/or focused internal audits of policy/procedure adherence.



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12. Coordinate non-routine audits of the Chapter by external sources.
13. Respond to alleged violations of laws, regulations, policies and procedures by evaluating or recommending the initiation of investigative procedures; develop and oversee a system for the uniform handling of such violations.
14. Establish and manage the Chapter's compliance hotline and communicate any matter deemed potentially illegal, unethical, or otherwise abusive or improper to the legal, quality assurance or compliance committee of the Chapter; take steps to protect the anonymity of complainants and protect complainants from retaliation; directly investigate certain complaints; oversee the investigation of others, and ensure the implementation of consistent disciplinary action against employees or contractors who violate compliance policies and procedures.
15. Ensure proper reporting of violations or potential violations to duly authorized enforcement agencies as appropriate or required.
16. Consult with the Arc NY AED to resolve difficult compliance issues.
17. Report to the Chapter Board and to the Chapter Compliance Committee on a regular basis or whenever called upon to do so, including identification of and recommendations for response to compliance issues.

### **QUALIFICATIONS:**

**Education and References:** Bachelors degree required. Advanced degree (e.g. Masters, J.D., Ph.D etc.) and prior compliance experience preferred. References and work history demonstrating high ethical standards and reputation for integrity.





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### Experience:

- Minimum of five years experience in the health care industry or a related field. ICF/IDD experience preferred.
- Experience with regulatory issues and face-to-face contact with staff of regulatory agencies.
- Knowledge of the relevant portions of the U.S. Sentencing Guidelines.
- Understanding of government requirements/guidance for health care compliance programs.
- Familiarity with New York Medicaid program requirements and New York and federal fraud and abuse laws (e.g. False Claims Act, Anti-Kickback, Stark, etc.).

### Skills:

- Maintains a high degree of credibility, independence, integrity, confidentiality and trust.
- Demonstrates sound business judgment and is supportive of the Arc New York's mission and objectives. Commands the respect of senior management, board-level committees and staff.
- Understands the complexities of a large organization. Involves staff appropriately in consultations and decisions. Demonstrates strong self-initiative and self-motivation.
- Understands the legal structure and regulatory framework of the Arc New York.
- Exhibits analytical skills and an understanding of operational processes and technology concepts.
- Maintains strong writing skills required to write and edit policies and procedures, to issue memorandums and compile reports.
- Exhibits good presentation skills with large and small audiences and with all levels of employees.
- Detail-oriented and commitment to teamwork.



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### Exhibit B

#### Statements of Commitment to Compliance

“Corporate Compliance, in conjunction with our values, must be a cornerstone in the foundation of our programs. We will succeed in our mission and in accomplishing our goal of excellence in our supports and services by demonstrating a total commitment to be in compliance with the laws and regulations that govern our programs, and by showing ethical conduct in decision-making as we do our jobs. I fully support the [Chapter] Compliance Plan, particularly its Code of Conduct, and I ask that each of you carry that same commitment by contributing to its success.

Thank you,  
[Board Chair; Executive Director; Corporate Compliance Committee Chair]”

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“I am pleased to be participating with all of you in as positive a program as the [Chapter’s] Corporate Compliance Plan and the ethical decision-making that it fosters. I trust that you will find that our Corporate Compliance Plan gives you the clear standards and supportive guidance that are important your on-the-job experiences. In addition, the Corporate Compliance Plan supports our values, promoting a great environment for staff and for clients, as well as for those individuals and business who are our partners. I look forward to observing the evidence of your commitment to the effectiveness of our Corporate Compliance Plan and welcome your recommendations and feedback on compliance issues. I am available to you as a resource at any time.

Thank you,  
[Chapter Compliance Officer]”



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