

The Arc of Madison Cortland
Corporate Compliance Plan

Response to Detected Offenses

Date of First Issue: May 2005

Date of Last Revision: Jan 2009, Jan 2015

I. POLICY

The Arc of Madison Cortland is committed to serving its' clientele by following all applicable laws and regulations. To this end, The Arc of Madison Cortland will respond to reports of violations of the compliance plan and any detected failures to comply with federal and state laws. We will investigate whether or not a violation has occurred, what disciplinary action should be taken, and what corrective actions will be put in place to prevent a similar occurrence.

II. RESPONSIBLE PARTY

The CO will have primary responsibility for initiating and overseeing any and all investigations relative to potential violations of the compliance plan and determining which investigations require the attention and/or a final review by the Compliance Oversight Committee.

The Compliance Oversight Committee (COC) will evaluate and conduct final reviews and determinations relative to investigations brought before it by the CO. Decisions to involve *legal counsel* will be made by this committee.

III. DEFINITIONS

Legal counsel is an attorney or law firm that specializes in the practice of health care law in which the agency seeks counsel. The decision to consult or involve legal counsel is made by the Compliance Oversight Committee.

Violation of the Compliance Plan is any action of an employee, member of the Board of Directors, individual under contract, or volunteer deemed to place the agency at risk through non-adherence of the compliance plan as communicated through compliance standards and policy.

I. PROCEDURE FOR RESPONDING TO A DETECTED OFFENSE

The CO will implement and prioritize processes by which grievances brought to her/his attention will be investigated and resolved. Those called upon to assist in the process are chosen at the officer's discretion. All compliance-related issues and investigations will be reported to the Compliance Oversight Committee during regularly scheduled meetings, or as necessary. Form #1414 "Response to Reported Compliance Issue" will be completed, either by the CO or CCC, and kept in a confidential file in the office of the CO. Issues and/or investigations determined by the CCC and/or CO to be of a critical nature will be reported immediately to the COC

The CCC and/or CO will be responsible to document all grievances and investigations and will retain this documentation according to Compliance Documentation Retention Policy.

**The Arc of Madison Cortland
Response to Reported Compliance Issue**

Type of Report

- Suspected Violation/Misconduct Regulatory Inquiry Agency P&P Inquiry
 Ethical Business Practice

Source of Report

- Employee, Independent Contractor Vendor/Subcontractor Board Member
 Service Recipient/Family Member Other Provider Other _____
 Former Employee Anonymous

Mode of Contact

- Report to Supervisor Hotline Email
 Telephone Message Walk-In Staff Meeting
 Compliance Training Letter or Note Compliance Officer
 Letter to Board or CEO/Executive Director

Summary of Issue

Follow Up

Reported to Compliance Officer By: _____ Date: _____ Time: _____

Reported to CEO/Executive Director: _____ Date: _____

Reported to Compliance Oversight Committee

Date: _____

Reported to Board of Directors

Date: _____

Actions Taken

Immediate response provided

Internal investigation initiated;

Assigned to/date: _____

Researched regulations

External investigation;

Entity/Date: _____

Researched agency P & P

Referred to legal counsel

Name/Date: _____

Responded to reporter; Date: _____

Summary of Action Taken

Final Disposition by Compliance Officer

Completed By

Compliance Officer Name (*print*)

Signature

Date
#1414 (5/12)