

**Madison Cortland Chapter, NYSARC, Inc.**

# **Corporate Compliance Plan**

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**Madison Cortland Chapter, NYSARC, Inc.**  
**Corporate Compliance Plan**  
**Plan Summary**

**Element 1 Compliance Policies and Procedures**

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*“The organization must have established compliance standards and procedures to be followed by its employees and other agents that are reasonably capable of reducing the prospect of criminal conduct.”<sup>1</sup>*

The Arc of Madison Cortland will develop and review, at least annually, a Compliance Code of Conduct, which will provide employees with guidance on requirements for employment conduct as established by The Arc of Madison Cortland and the regulations, laws and standards that are applicable to our work.

The Arc of Madison Cortland has developed and will continuously review policies and procedures associated with the Corporate Compliance Plan.

**Element 2 Oversight Responsibilities**

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*“Specific individual(s) within high level personnel in the organization must have been assigned overall responsibility to oversee compliance with such standards and resources.”*

The Arc of Madison Cortland is committed to the operation of an efficient and effective compliance program. The organization has therefore formalized an organizational structure including a Compliance Officer who will build the infrastructure for compliance, will assist management in monitoring, and will provide an objective point of view. The organizational structure will also include a Compliance Oversight Committee, and a Corporate Compliance Committee. These committees will assist the Compliance Officer in the development, implementation, oversight, and evaluation of the ethics and compliance program.

The Madison Cortland Arc Board of Directors will be an integral part of the Corporate Compliance Plan and will be knowledgeable about the content and operation of the Madison Cortland Arc Corporate Compliance Plan and will exercise oversight with respect to the implementation and effectiveness of the Corporate Compliance Plan.

**Element 3 Training and Education**

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*“The organization must have taken steps to communicate effectively its standards and procedures to all employees and other agents, e.g., by requiring participation in training programs or by disseminating publications that explain in a practical manner what is required.”*

The Arc of Madison Cortland is committed to implementing an effective compliance program that will help to ensure that we deliver high quality services that are compliant with the regulations and laws that are applicable to our work.

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<sup>1</sup> Italicized statements are the Federal Sentencing guidelines.

The Board of Directors, all employees and, as applicable, independent contractors, must be informed about regulatory requirements and The Arc of Madison Cortland policies and procedures that implement these requirements, as they apply to each individual. Therefore, the Arc of Madison Cortland will adequately train the Board, all affected employees, and independent contractors on the organization's standards and procedures. The Arc of Madison Cortland will continuously identify training topics, including those arising as a result of self-monitoring, audits by regulatory agencies and regulatory developments.

New employees will receive training in the Arc of Madison Cortland Code of Conduct, this Corporate Compliance Plan and those policies and procedures relevant to their job duties as part of an orientation program. The Arc of Madison Cortland will tailor its training based on the roles and responsibilities of each group of individuals and in a manner that the individual can understand.

#### **Element 4 Communication Lines to Compliance Officer**

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*"The organization must establish a method for reporting potential compliance issues as they are identified."*

The Arc of Madison Cortland has open communication lines to the Compliance Officer that are accessible to all employees and others associated with the Chapter and that allow compliance issues to be reported. The communication lines include a method of anonymous and confidential good faith reporting of potential compliance issues as they are identified. Employees may use whatever form of communication he or she prefers, including our hotline, where the option to remain anonymous exists.

#### **Element 5 Disciplinary Policies**

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*"The standards must have been consistently enforced through appropriate disciplinary mechanisms, including, as appropriate, discipline of individuals responsible for the failure to detect an offense. Adequate discipline of individuals responsible for an offense is a necessary component of enforcement; however, the form of discipline that will be appropriate will be case specific."*

Employees who fail to comply with the policies and standards or who engage in conduct that has the potential of impairing The Arc of Madison Cortland status as a reliable, honest and trustworthy healthcare provider will be subject to disciplinary action up to and including termination.

Employees may be subject to discipline for the following infractions:

- failing to report suspected problems;
- participating in non-compliant behavior; or
- encouraging, directing, facilitating or permitting either actively or passively non-compliant behavior

Such disciplinary policies shall be fairly and firmly enforced.

## **Element 6 Monitoring and Auditing**

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*“The organization must have taken reasonable steps to achieve compliance with its standards, e.g., by utilizing monitoring and auditing systems reasonably designed to detect criminal conduct by its employees and other agents.”*

The Arc of Madison Cortland will have a system for routine identification of compliance risk areas, self-evaluation of such risk areas, including but not limited to internal and external monitoring and internal and external audits.

The Arc of Madison Cortland is committed to maintaining the integrity of our service, financial, and business operations. In order to do this it is important that we hire or contract with those individuals and organizations that have the same respect for law, regulation and standards that we do. Therefore, before hiring a new employee or independent contractor, the agency will conduct appropriate screening activities to make sure the individuals and organizations have not been sanctioned or excluded by a federal or state law enforcement agency, regulator, or licensing agency.

Due care will be used in protecting the agency against any potential conflicts of interest. All members of the Board of Directors, Executive and Management staff will sign a statement disclosing any conflicts or potential conflicts. This will be done on an annual basis.

## **Element 7 Response to Compliance Issues**

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*“After an offense has been detected, the organization must have taken all reasonable steps to respond appropriately to the offense and to prevent further similar offenses-including any necessary modifications to its program to prevent and detect violations of law. “*

It is important for The Arc of Madison Cortland compliance program to detect and report instances of non-compliance on a timely basis. If a compliance problem is reported or detected internally, the agency, through its compliance program staff, will investigate to determine if credible evidence exists that a violation of law or regulation has occurred. If, after investigation or inquiry, the agency determines that credible evidence exists of violation of law or regulation, it will immediately implement a corrective action plan to correct the problem and to prevent its reoccurrence. It may also consult with legal counsel to determine if it is necessary to report the violation to law enforcement or to a regulatory agency, and will do so in a timely fashion, once a voluntary report is determined to be necessary.

## **Element 8 Non-Retaliation and Non-Intimidation Policy**

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*“The organization must have a policy of non-intimidation and non-retaliation for good faith participation in the compliance program.”*

Our Code of Conduct states that we have our responsibility to maintain an environment where we can feel free to address concerns and report suspected noncompliance. Managers have a responsibility to promote this environment and educate our workforce, letting them know that we do not tolerate retaliation or retribution against anyone who in good faith reports illegal, unethical, or inappropriate activity that they are aware of at The Arc of Madison Cortland. Such retaliation will be subject to disciplinary action, up to and including dismissal.

## **Element 1      COMPLIANCE POLICIES AND PROCEDURES**

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### *Related Documents (see Appendix)*

- Compliance Code of Conduct
- The Arc of Madison Cortland Board of Directors Resolution #05-31-02
- Compliance Program Maintenance

*“The organization must have established compliance standards and procedures to be followed by its employees and other agents that are reasonably capable of reducing the prospect of criminal conduct.”<sup>2</sup>*

The Chapter’s Compliance Standards are expressed in our Compliance Code of Conduct, Compliance Plan, and Procedures. Additional compliance guidance is contained in documents specific to our Departments (e.g., HCBS Waiver Services, Article 16 Clinic, Residential, Accounting).

These documents collectively establish compliance standards and procedures that must be followed by all The Arc of Madison Cortland associates.<sup>3</sup> Understanding and following them will reduce the prospect of unethical, illegal, or criminal conduct and will protect The Arc of Madison Cortland and its associates.

All The Arc of Madison Cortland employees and Board members will receive a copy of the Code of Conduct and are responsible for reading this Code and seeking answers to any questions they may have regarding its content or intent.

### Revisions to the Corporate Compliance Program

The Chapter’s Corporate Compliance Program and its policies are intended to be flexible and readily adaptable to changes in regulatory requirements and the needs of the Chapter. The Program will be reviewed annually by the Corporate Compliance Committee and specific portions of the Program will be reviewed on an as-needed basis when prompt revisions are indicated. To facilitate appropriate revision to the Program, the Compliance Officer shall prepare an annual report for the Board of Directors, and the Executive Director, that describes the general compliance efforts that have been undertaken during the preceding year, and that identifies any changes that might be made to improve the Program.

Circumstances may necessitate more immediate changes or updates to the Compliance Program during the course of the year. These prompt changes may arise from amended laws changes. The Compliance Officer will draft such urgent changes or updates. Following comment and revision, the amended portion of the Compliance Program will be presented at the next scheduled meeting of the Corporate Compliance Committee for discussion.

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<sup>2</sup> Italicized items are the Federal Sentencing Guidelines.

<sup>3</sup> The terminology “Arc of Madison Cortland associates” is used throughout this document to refer to employees, the Board of Directors, volunteers, health care vendors and contractors, affiliated companies, and any other agent of the Arc of Madison Cortland.

## **Element 2    OVERSIGHT RESPONSIBILITIES**

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*Related Documents (see Appendix)*

- Program Structure and Oversight Responsibilities*
  - a. The Role of the Compliance Officer*
  - b. The Role of the Compliance Oversight Committee*
  - c. The Role of the Corporate Compliance Committee*
  - d. The Role of Management*

*“Specific individual(s) within high level personnel in the organization must have been assigned overall responsibility to oversee compliance with such standards and resources.”*

The Arc of Madison Cortland has assigned compliance oversight responsibilities to individuals at the Executive levels. These individuals occupy high levels within The Arc of Madison Cortland’s organizational structure and are empowered to implement the Compliance Plan, investigate compliance concerns, report compliance concerns directly to those in higher positions of authority up to, and including the Executive Director, President<sup>4</sup>, and the Board of Directors. The Arc of Madison Cortland is committed to the operation of an effective compliance program.

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<sup>4</sup> The term “President” as used in this document denotes the President of the Board of Directors of the Chapter.

### **Element 3 TRAINING AND EDUCATION**

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*Related Forms (see Appendix)*

- ☑ *Compliance Education and Training*
- ☑ *Acknowledgement Form, Employees*
- ☑ *Acknowledgement Form, Board of Directors and Building Futures Foundation Board members*

*“The organization must have taken steps to communicate effectively its standards and procedures to all employees and other agents, e.g., by requiring participation in training programs or by disseminating publications that explain in a practical manner what is required.”*

The Arc of Madison Cortland provides education and training programs in a variety of content areas for employees, the Board of Directors, and health care contractors. This education and training program communicates The Arc of Madison Cortland’s standards and procedures to enhance and maintain awareness of compliance policies and laws. Both initial and annual compliance education and training that is appropriate to the circumstances and duties of an employee’s job are provided. Education and training content areas shall include all areas of Corporate Compliance<sup>5</sup>, as well as issues specific to a particular program, particular job, function, or activity (i.e. billing, information security).

All personnel and members of the Board of Directors, and Building Futures Foundation members shall participate in training on the topics identified below to which their responsibilities are relevant:

- Government and private payer reimbursement principles,
- Government initiatives,
- History and background of Corporate Compliance,
- Legal Authority,
- General prohibitions on paying or receiving remuneration to induce referrals,
- Prohibitions against submitting a claim for services when documentation of the service does not exist,
- Prohibitions against signing for the work of another employee,
- Prohibitions against alterations to individuals’ records,
- Prohibitions against performing medical or nursing therapies without a signed physician’s order,
- Proper documentation of services rendered, and
- Duty to report misconduct.

Managers shall assist the Compliance Officer in identifying areas that require specific training and are responsible for communication of the terms of the Compliance Plan to all independent contractors doing business with the agency. Managers are responsible for assuring that all health care related contractors abide by the terms of the Compliance Plan. Each employee and contractor shall receive a written summary of the compliance policies and specific standards of

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<sup>5</sup> Areas of Corporate Compliance include, but are not limited to, the Code of Conduct and Code of Ethics and Philosophy.

conduct that affect their position. They will also be informed of the location of the entire Compliance Plan and will have access to this document.

All education and training relating to the compliance plan will be verified by attendance. A signed acknowledgement of initial training and receipt of compliance plan and standards (Form #994) will be kept in the employee's personnel file.

Attendance at annual compliance training sessions is mandatory and is a condition of continued employment.

## **Element 4    COMMUNICATION LINES TO COMPLIANCE OFFICER**

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*Related Documents (see Appendix)*

*Compliance Line*

*“The organization must establish a method for reporting potential compliance issues as they are identified.”*

### Reporting Systems

Compliance issues/concerns may be presented initially to managers, the Compliance Officer or the Executive Director as appropriate.

The Arc of Madison Cortland employees who report compliance concerns in good faith will not be subject to retaliation or harassment as a result of the report. Concerns about possible retaliation or harassment stemming from a compliance report may be reported to the hotline, Compliance Officer, or Human Resources Manager.

The Compliance Officer will maintain a confidential log of compliance concerns that are reported. This log will record specific information about the concern and the person filing the initial report. Access to the confidential log is limited to the Compliance Oversight Committee and Quality Evaluators. A summary of the log and any investigations will be included in monthly board reports and in the annual compliance report to the Board of Directors.

### Confidential Compliance Line (‘Hotline’)

The Arc of Madison Cortland’s Compliance Hotline permits compliance issues to be reported on an anonymous or confidential basis. The hotline is available 24 hours per day, seven days per week. Issues can be reported via a toll free number or by completing a web-based report. Reports to the Hotline may be made:

- Anonymously (the caller does not reveal his identity during the call)
- Confidentially (the caller reveals his/her identity but requests confidentiality)
- Identified (the caller reveals his/her identity and allows it to be used as needed)

All Hotline reports are directed to the Compliance Officer. Anonymous callers will be provided the opportunity to obtain a code number by leaving a call back number. The purpose of the call back number is to remain anonymous while still having the opportunity to call the compliance line at a later date to receive a follow up and/or resolution.

The Compliance Officer will maintain a log reflecting all compliance issues reported via the Hotline and the resolution of those reports.

## **Element 5    DISCIPLINARY POLICIES**

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*Related Documents (see Appendix)*

- Discipline & Incentive Program Policy*
- Enforcement and Discipline*

*“The standards must have been consistently enforced through appropriate disciplinary mechanisms, including, as appropriate, discipline of individuals responsible for the failure to detect an offense. Adequate discipline of individuals responsible for an offense is a necessary component of enforcement; however, the form of discipline that will be appropriate will be case specific.”*

The Arc of Madison Cortland consistently enforces compliance with its standards through appropriate disciplinary mechanisms. Disciplinary procedures are weighted according to the compliance violation committed and the employee’s compliance history.

All compliance-related disciplinary action shall be documented in an employee’s personnel record maintained by Human Resources. A copy will also remain with the Compliance Officer. While there are broad categories of disciplinary actions, each instance of compliance discipline will be case-specific.

Disciplinary action, up to and including dismissal, will occur for the following verified infractions:

- Failure to report suspected problems
- Participating in non-compliant behavior
- Encouraging, directing, facilitating, or permitting either actively or passively non-compliant behavior
- Retaliation against anyone who reports a compliance concern in good faith

The Arc of Madison Cortland has established a “zero tolerance” for cases of verified fraud. Any employee or contractor determined to have committed fraud will be terminated.

## **Element 6    MONITORING AND AUDITING**

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### *Related Documents (see Appendix)*

- ☑ *Internal Compliance Audit Standards*
- ☑ *Document Retention Policy*
- ☑ *Electronic Storage of Paper Documentation Procedure*
- ☑ *Files for Storage/Archive Instructions*
- ☑ *Document /File Retrieval Procedure*
- ☑ *Billing Adjustment Procedure & Form*
- ☑ *Discovery of Missing Documentation from Outside Entity Procedure & Form Letters*
- ☑ *Credentialing of Professional Employees*
- ☑ *Professional License/Certification Attestation*
- ☑ *Policy Regarding Conflicts of Interest and Related Party Transactions*
- ☑ *Conflicts of Interest and Related Party Transactions Acknowledgement*
- ☑ *Criminal Background Checks - OPWDD*
- ☑ *Criminal Background Checks - OMH*
- ☑ *Employee Exclusion Check Policy/Procedure*
- ☑ *Vendor/Contractor Exclusion Check Policy/Procedure*
- ☑ *Employee Disclosures Procedure*
- ☑ *Employee Disclosure Form*
- ☑ *Child Abuse Policy*

*“The organization must have taken reasonable steps to achieve compliance with its standards, e.g. by utilizing monitoring and auditing systems reasonably designed to detect criminal conduct by its employees and other agents.”*

The Arc of Madison Cortland utilizes internal and external monitoring and auditing systems to detect unethical, non-compliant, or illegal conduct by The Arc of Madison Cortland associates.

### Auditing Systems

The Arc of Madison Cortland engages in a system of ongoing monitoring and internal audits of its programmatic and business activities. The Compliance Officer determines annual priorities for internal audit and/or review. There are three general objectives that drive these reviews:

- To assist the Chapter in performing risk analysis to determine compliance risk factors.
- To assist the Chapter in implementing effective and efficient internal controls and process improvements that are responsive to the risk factors and that provide reasonable assurance of the Chapters’ compliance with laws and regulations.
- To monitor compliance with the Chapter’s policies and procedures.
- To improve overall quality of the services provided.

Any significant deficiencies in The Arc of Madison Cortland’s system of internal controls will be reported along with recommendations for process improvement and follow-up actions.

Individual departments are also responsible for quality assessment and improvement efforts and for monitoring procedures for compliance. Practices for the monitoring of departments are

approved by, and results communicated to, the Compliance Officer to insure practicality and effectiveness.

As a provider of health related services to people with disabilities, the organization must use due care not to delegate substantial discretionary authority to individuals whom the organization knows, or should have known through the exercise of due diligence, have propensity to engage in illegal activities that would result in exclusion or debarment from Federal Health Care programs.

The Arc of Madison Cortland uses due care to meet all regulatory standards not to employ and/or delegate substantial discretionary authority to individuals who have a propensity to engage in illegal activities regarding services to the disabled. This standard is applied to all new and existing employees, contractors and vendors.

### New Employees

The Arc of Madison Cortland Human Resources conducts a pre-employment screening verification, *based on regulatory and agency requirements* as stated in the job description, for all new employees as part of the employment application process. This prescreening includes, but is not necessarily limited to educational qualifications and license verification as disclosed by the applicant and verification against appropriate federal and state excluded parties' lists.

As part of the job application process, all candidates must disclose criminal convictions, certify that he/she is not currently or has ever been debarred, excluded or ineligible from participation in the NYS Medicaid Program and/or a federal health care program. (See Form '*Professional License/Certification Attestation*' appendix and Employee Application Insert- Attestation). The Arc of Madison Cortland policies prohibit the employment of individuals who are listed as debarred, excluded, or otherwise ineligible for participation in Federal health care programs (as defined in 43 USC 1320a & c).

In addition, employees in selected classifications are required to pass a pre-employment drug screening examination, and/or screening done by the NYS Office of Child and Family Services and the Division of Criminal Justice Services. The Arc of Madison Cortland is prohibited from hiring or contracting with anyone that has been identified on the NYS Staff Exclusion List.

### Existing Employees and Board Members

All existing professionally licensed employees are screened annually (if appropriate)<sup>6</sup> to ensure that their professional licenses are active and accurate. In addition, employees will be screened to determine if they are currently under an investigation of the NYS Office of the Professions. Professional employees may be subjected to termination, if the aforementioned items are not found to be in order.

All existing employees and members of the Board of Directors will be checked monthly against the appropriate federal and state exclusion lists to assure that they have not been added to this database.

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<sup>6</sup> For purposes of this section, existing employees are screened if their title is in a category that is associated with federal and/or state funding associated with this compliance program.

## Vendors and Contractors

Any vendor or contractor wishing to enter into a contract with The Arc of Madison Cortland is required to certify in its contract that neither it nor any of its employees has been excluded from participation in federally sponsored health care programs. Each vendor/contractor shall be checked monthly by the Finance Department for potential exclusion against appropriate state and federal exclusion lists.

## Conflict of Interest

The Arc of Madison Cortland Board of Directors, Building Futures Foundation members, and upper management staff are required to sign a Conflict of Interest statement annually. They should avoid, or where impossible to avoid, should disclose outside business interests that could compromise their commitment to The Arc of Madison Cortland.

## Employee Disclosures

Employees are permitted to hold outside employment if it does not interfere with their attendance and/or job performance and does not represent a conflict of interest. Agency employees shall notify their supervisor using an Employee Disclosure Form. The supervisor shall then forward the form to the Human Resources Department. Employees on a Leave of Absence are not allowed to have employment elsewhere unless approved in writing by the Executive Director or designee.

Employees are required to complete a disclosure form when they have a relative working for, or receiving services from The Arc of Madison Cortland. Relative is defined as spouse, domestic partner, child, parent, sibling, grandparent, grandchild, uncle, aunt, first cousin or corresponding in-law or step-relation.

## Criminal Background Checks

The Arc of Madison Cortland meets or exceeds the criminal background checks requirements as per NYS law(s). Employees, vendors, and contractors-that must undergo a criminal history background check, by virtue of their job description, are obligated to inform their supervisor or the Director of Human Resources of any arrests or bars/exclusions that occur while employed within 48 hours of occurrence.

## **Element 7    RESPONSE TO COMPLIANCE ISSUES**

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### *Related Documents (see Appendix)*

- Response to Detected Offenses*
- Response to Warrants*
- Response to Subpoenas*
- Response to Government Audits or Inquiries*
- Detecting and Responding to Violations; Voluntary Disclosure Policy*
- Self-Disclosure Policy*
- NYS OMIG Self-disclosure Submission Guidelines*
- NYSARC, Inc. Board of Governors Resolution Requiring the Reporting of Significant Compliance Events*

*“After an offense has been detected, the organization must have taken all reasonable steps to respond appropriately to the offense and to prevent further similar offenses-including any necessary modifications to its program to prevent and detect violations of law.”*

### Response

The Arc of Madison Cortland continually monitors its compliance “atmosphere” with the intent of detecting, correcting, and preventing non-compliance behaviors. Through the process of its compliance reporting structure and the articulation of compliance-related roles and responsibilities at all levels, detection and correction of problems is expedited. The modalities for compliance reporting (which may be internal or via the Hotline; identified, confidential, or anonymous) encourage compliance concerns to be brought forward when The Arc of Madison Cortland employees have concerns. The Arc of Madison Cortland’s Compliance Officer and Compliance Oversight Committee may be involved in any or all stages of resolving a compliance report as appropriate. The collection of cumulative report information allows the Compliance Officer and Compliance Oversight Committee to detect potential areas of recurring problems and to institute measures to prevent future problems.

### Correction

Our responses may include making prompt correction of overpayments, and notifying/self-disclosing to the appropriate governmental agencies.

All compliance matters where there is a substantial reason to believe that a Chapter director, officer, or executive manager has permitted or engaged in illegal activity must also be reported to NYSARC’s state office compliance staff.

### Prevention

Organization of the Compliance Program ensures that compliance issues may be forwarded to the Executive level. This allows systemic changes in policies and procedures to occur, thus reducing the prospect of future problems. In addition, The Arc of Madison Cortland’s compliance education, continuing education, and awareness programs, contribute to a culture of on-going awareness, detection, and prevention.

## **Element 8    NON-RETALIATION AND NON-INTIMIDATION POLICY**

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*Related Documents (see Appendix)*

- False Claims Act*
- Reporting Compliance Concerns/Whistleblower/Anti-Retaliation Policy*

*“The organization must have a policy of non-intimidation and non-retaliation for good faith participation in the compliance program.”*

The Chapter’s Code of Conduct specifically states our responsibility to ensure employees are treated with mutual respect. To this end, any employee who brings forth a compliance concern *in good faith* will have assurance of non-retaliation & non-intimidation. “Good faith” is defined as “a sincere belief or motive without any malice or the desire to defraud others”.

Managers will treat all employee compliance concerns with a high degree of importance, and bring all issues to the Compliance Officer or designee in a timely fashion. Confidentiality will be protected to the degree possible.

Specific areas of protected activity include (but are not limited to):

- Reporting potential issues
- Investigating issues
- Self-evaluations, audits, and remedial actions
- Reporting to appropriate officials as allowed by NYS Labor Law 740 & 741