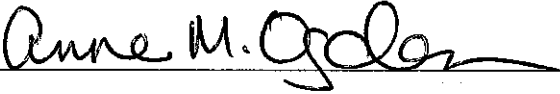


Catholic Charities Disabilities Services
Agency Standard and Procedure

Standard Category	Quality Assurance
Standard Title	Corporate Compliance, Addendum
Regulations	Affordable Care Act Social Services Law, §363-d
Original Issue Date	June 13, 2011
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Attachments	
Approved by: Anne Ogden, Executive Director	

Introduction: Catholic Charities in accordance with its mission is an organization committed to quality services and works diligently in creating a culture that is characterized by ethical conduct and decision making, transparency, continuous quality improvement and support to staff through education and training. An essential part of this organizational culture is a commitment to compliance with the laws, rules, regulations, and codes of federal, state, and local entities that guide the delivery of our services. This standard serves as an addendum to the Catholic Charities of the Diocese of Albany’s (CCDA) Corporate Compliance Plan and Standard. It serves as a Catholic Charities Disabilities Services (CCDS) specific procedure.

Standard: CCDS will provide programs and services in compliance with all state and federal laws and consistent with the highest standards of business and professional ethics.

1. Written Standards: The foundation of an effective compliance plan is maintenance of written standards. CCDS will maintain a variety of written compliance standards including:

- code of conduct (refer to CC Code of Conduct)
- conflict of interest
- sanction screening
- incident management
- substance abuse of employees (refer to CC Employee Handbook)
- record retention
- internal audits
- reimbursement practices for billing errors

2. **Compliance Plan Oversight:** Catholic Charities of the Diocese of Albany (CCDA) appoints a Corporate Compliance Officer (CCO) who will oversee and approve corporate compliance activities of the entire system of agencies. The CCDA CCO has overall responsibility for the corporate compliance activities.
3. **Training:** All employees, volunteers, interns, and members of the Board of Directors will receive mandatory training regarding compliance, fraud, abuse, whistle blower protection, ethical standards, confidentiality, and conflict of interest protection. These individuals will participate in ongoing refresher training at least annually.
4. **Auditing and Monitoring:** Regular internal audits will be conducted by the agency. The areas selected for audit will be determined on an annual basis.
5. **Annual Work Plan:** On an annual basis the agency will develop a quality improvement plan. This plan will outline the auditing and monitoring activities for the agency for the year.
6. **Duty and Duty to Report:** It is the duty of employees to comply with the codes of ethical conduct and compliance standards applicable to their individual areas of employment and assignment. If at any time an employee becomes aware of an apparent violation of CCDS standards, he or she must report it in accordance with the agency reporting requirements. To make such a report, an employee may contact his or her supervisor, the CCDS Director of Quality Assurance, the CCDS Executive Director, The Catholic Charities of the Diocese of Albany Corporate Compliance Officer, or utilize the Ethics Hotline (1-866-662-1875).
7. **Confidentiality of Reports:** All reports of apparent violations of CCDS standards will be treated as confidential to the extent permissible and will only be shared on a need to know basis.
8. **No Retaliation Policy (Whistleblower Protection):** CCDS will not take any adverse action against any employee who in good faith makes a report of an apparent violation of CCDS standards.
9. **Responding to Reports:** When a concern is brought to the CCO, he or she will research the concern and, if necessary conduct or oversee an investigation. The CCO will confer with the Executive Director and, if necessary, counsel. If the investigation determines the non-compliant behavior occurred, a corrective action plan, and/or recommendation for disciplinary action will be prepared and presented to the Executive Director.
10. **Failure to Report:** If an employee does not report conduct which may violate CCDS standards, the employee may be subject to disciplinary action (see also 11 below).

11. **Enforcement of Compliance Standards:** Failure to comply with this standard, with the laws and regulations regarding CCDS programs, or with CCDS standards may result in disciplinary action. This discipline may occur as warranted and include discipline of employees who fail to report non-compliant conduct, employees involved in non-compliant conduct, managers or supervisors if the misconduct reflects poor supervision or lack of diligence and employees who intentionally make false statements or otherwise misuse the Ethics Hotline.