

Catholic Charities Disabilities Services	
Agency Standard and Procedure	
Standard Category	Quality Assurance
Standard Title	Corporate Compliance, Addendum to the System Wide Corporate Compliance Standard
Regulations	1) Affordable Care Act 2) Social Services Law, §363-d
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Attachments	
Approved by: Paula Warika, Executive Director	

Standard:

This Standard serves as an addendum to the Catholic Charities of the Diocese of Albany's (CCDA) Corporate Compliance Plan. It serves as a Catholic Charities Disabilities Services (CCDS) specific procedure. 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.

Procedures:

1. **Written Standards and Policies:** The foundation of an effective compliance plan is maintenance of written standards and policies. CCDS will maintain a variety of written compliance standards and policies including:
 - Agency Written Instructions
 - Code of Conduct (includes Drug Free Workplace)
 - Com Hab Billing
 - Conflict of Interest
 - Corporate Compliance
 - Corporate Compliance Addendum
 - Medicaid Billing Errors and Self-Disclosures
 - OPWDD Housing Subsidy
 - OPWDD Incident Management
 - Record Retention and Destruction
 - Respite Billing
 - Self-Direction Fiscal Intermediary (FI) Billing
 - Supervised IRA Billing
 - Supervision on Newly Hired, but Uncleared Staff
 - TBI
 - Transitions in Residential Services

2. **Compliance Plan Oversight:** At the CCDS agency level, the Executive Director will appoint the Director of Quality Assurance to oversee and approve corporate compliance activities at the agency level. The Director of Quality Assurance or designee will report directly to the Executive Director. Additionally, the Director of Quality Assurance or designee will maintain a direct line of

Standard: *Corporate Compliance, 2011.09.29*

communication with both the CCDA Corporate Compliance Officer (CCO), as well as the President of the CCDS Board of Directors. The CCDA CCO has overall responsibility for corporate compliance activities.

3. **Training:** All employees, volunteers, interns, and members of the Board of Directors who have substantial ongoing contact with individuals who receive services, 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 to Report:** If at any time an employee becomes aware of an apparent violation of CCDS standards, they must report it in accordance with agency reporting requirements. To make such a report, an employee may contact their supervisor, the CCDS Director of Quality Assurance, the CCDA CCO, or utilize the CCDA ethics hot line.
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 an employee's supervisor they will report it to the Director of Quality Assurance or designee, or when applicable, to the Corporate Compliance Ethics Hotline.
 - a) The Director of Quality Assurance will research the concern and, if necessary and in consultation with the CCDA CCO, conduct or oversee an investigation.
 - b) The Director of Quality Assurance or designee will confer with the Executive Director and, if necessary, counsel.
 - c) The Director of Quality Assurance or designee will make the CCDS Human Resources Agency Partner or designee aware of any open investigation of current employee(s) of CCDS.
 - d) If the investigation determines that non-compliant behavior occurred, a corrective action plan, and/or recommendation for disciplinary action will be prepared and presented to the Executive Director, or designee, as well as the CCDA CCO and the CCDS Human Resources Agency Partner.
10. **Failure to Report:** If an employee does not report conduct which may violate CCDS standards, the employee may be subject to disciplinary action.
11. **Enforcement of Compliance Standards:** Failure to comply with this standard, with 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.