



The Schoharie Arc Corporate Compliance Plan Summary

As a not-for-profit health and human services organization dedicated to improving the everyday lives of people with developmental disabilities, the Schoharie Arc is committed to complying with the rules and regulations of federal, state and local government, including but not limited to those promulgated by the U.S. Centers for Medicare and Medicaid Services (“CMS”) and the New York State Office for People With Developmental Disabilities (“OPWDD”). The Schoharie Arc seeks to provide a work environment where high standards of ethical and legal behavior are recognized and practiced.

In developing this Corporate Compliance Plan, we have relied upon a number of resources including The Arc New York’s Corporate Compliance Plan and numerous government issuances. To demonstrate that we have developed an effective compliance program we have adapted The New York State Office of the Medicaid Inspector General’s (“OMIG”) 8 elements into our program. The elements are as followed;

1. written policies and procedures that describe compliance expectations as embodied in a code of conduct
2. designate an employee vested with responsibility for the day-to day operation of the compliance program,
3. training and education on compliance issues, expectations and the compliance program operation,
4. communication lines to the Compliance Officer – how to report compliance issues
5. disciplinary policies to encourage good faith participation in the compliance program,
6. system for routine identification of compliance risk areas and non-compliance,
7. system for detecting, responding and preventing compliance issues as they arise (investigating, correcting, and preventing),
8. policy of non-intimidation and non-retaliation for good faith participation in the compliance program and allowance for employees to report to public officials consistent with sections 740-741 of the NYS Labor Law.

The compliance plan is applicable to: billings, payments, medical necessity and quality of care, governance, mandatory reporting, credentialing and other risk areas that are or should, with due diligence, be identified by the provider. The Compliance Plan is provided to all employees, persons associated with the provider, executives and governing body members. Information about our Corporate Compliance Plan is on the website at schohariearc.org.

The Corporate Compliance Plan was instituted by the Board of Directors on 2/25/03 and 11/28/06 and revisions were approved on 12/30/19. Our Corporate Compliance Plan supports and complies with The Arc of New York’s Board of Governors’ policy requiring that each chapter of The Arc New York implement an effective Corporate Compliance Plan.

The Schoharie Arc developed this Corporate Compliance Plan, including our Corporate Compliance Code of Conduct and a wide array of policies and procedures that address key risk areas, to guide our best efforts to operate under ethical and legal standards. It is expected that all aspects of providing direct support to individuals and business conduct will be performed in compliance with this Corporate Compliance Plan, professional standards and applicable governmental laws, rules and regulations.

Reporting a Corporate Compliance Concern

518-295-8125

Anyone may report their compliance concern(s) confidentially to the Schoharie Arc’s Compliance & Ethics Helpline **518-295-8125**. Callers may make reports anonymously. If a caller has revealed his or her identity, confidentiality will be maintained to the extent practicable and allowed by law. Callers should also be aware that the Schoharie Arc is legally required to report certain types of crimes or potential crimes and infractions to external governmental agencies. The Corporate Compliance Policies are available upon request.

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