

**THE WORKSHOP INC. dba
NORTHEAST CAREER PLANNING**

CORPORATE COMPLIANCE PLAN



Your Life · Your Success · Our Mission

**Effective Date:
03/21/2018**

A MESSAGE FROM THE CHIEF EXECUTIVE OFFICER

Northeast Career Planning is committed to delivering its services in accordance with the strict requirements of the law and in a manner that is consistent with high ethical and professional standards. Northeast Career Planning (NCP) has a Compliance Plan because it is required, in part, by Medicaid. The Office of the Medicaid Inspector General regulates that most Medicaid providers develop and implement Medicaid compliance programs (18 NYCRR 521, “Provider Compliance Programs”).

NCP’s Compliance Plan applies to the full range of NCP’s activities and is straightforward: keep it legal, take responsibility, be committed to NCP’s mission, and uphold the Code of Conduct. It is the responsibility of each employee, board member, contractor, consultant, volunteer, student intern, or accounts payable vendor to be familiar and in compliance with NCP’s Compliance Plan and Code of Conduct and to carry out all duties as they relate to NCP in a manner that demonstrates a commitment to honesty, integrity and compliance with the law.

The board and management of NCP value your input on the Compliance Plan. Several methods have been established for individuals to offer suggestions, express concerns, and report possible misconduct. The Compliance Hotline (518-465-5202, ext. 111) is a way for you to communicate anonymously. When you call the Compliance Hotline, you do not need to identify yourself, and your communication will be kept confidential, to the extent possible, consistent with NCP’s duty to investigate reports and respond to concerns.

NCP appreciates your support and cooperation. If you have any questions about the Compliance Plan or your responsibilities under it, I encourage you to contact your supervisor or the Corporate Compliance Officer.

Thank you,

Nancy

Nancy E. Rider
Chief Executive Officer

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1 Purpose and Evolution of this Compliance Plan

Northeast Career Planning (NCP) is committed to maintaining high ethical and legal standards and delivering high quality services. This Compliance Plan reflects the commitment of the Board of Directors to integrate compliance and quality into all aspects of NCP activities. It is designed to promote compliance with applicable laws and regulations as well as all requirements of government contracts and conditions of participation in public programs.

The Compliance Plan reflects a commitment to:

- Prevent fraud, abuse, and other improper activity by maintaining a culture of compliance within NCP;
- Detect errors and potential or suspected misconduct at an early stage;
- Respond swiftly to compliance problems through appropriate disciplinary and corrective action; and
- Encourage employees to report compliance concerns, and protect employees from retaliation for making reports in good faith.

Many aspects of the Compliance Plan have been in effect since before the development of a formal Compliance Plan document. Existing policies, procedures, and standards are integral to compliance controls. For example, a Fiscal Policies and Procedures Manual is maintained by the Director of Finance to detail a variety of fiscal functions, and Procedures Manuals may be adopted for particular programs.

The Compliance Plan is an evolving document. It will be amended and supplemented from time to time to reflect experience, and to conform to changes in laws, regulations, guidance, and best practices.

1.1 Scope of the Compliance Plan

The Compliance Plan reflects principles that all NCP employees, board members, contractors, consultants, volunteers, student interns, and accounts payable vendors are expected to adhere to as they perform their duties with regard to NCP. This group is referred to collectively in the Compliance Plan as “Covered Persons.”

All covered persons are expected to:

- (1) Familiarize themselves with the Code of Conduct and the compliance procedures that pertain to their NCP responsibilities;
- (2) Understand the key policies that govern their responsibilities to NCP;
- (3) Report any suspected fraud, abuse, non-compliance, or other improper activity through the mechanisms established under the Plan;
- (4) Cooperate in training, reviews, and other Compliance Plan functions; and
- (5) Carry out their responsibilities to NCP in a manner that demonstrates a commitment to honesty, integrity and compliance with the law.

1.2 Components of this Compliance Plan

This Compliance Plan is built around the eight compliance program components that are mandated by New York Social Services Law § 363-d, the regulations promulgated by the New York State Office of the Medicaid Inspector General (OMIG), and other applicable legal requirements. Although it is modeled in conformity with New York laws and regulations, the Compliance Plan

is specifically tailored to NCP. It is designed to meet operational needs and specific risks particular to NCP, and it takes into account the culture, size, structure, and other unique characteristics of NCP.

The essential components of the Plan are:

- (1) Implementation of written policies and procedures that:
 - a. Describe compliance expectations, as embodied in a Code of Conduct;
 - b. Implement the operation of the compliance program;
 - c. Provide guidance to employees and others on dealing with potential compliance issues;
 - d. Identify the means of communicating compliance issues to appropriate compliance personnel; and
 - e. Describe how potential compliance problems are investigated and resolved.
- (2) Designation of a Corporate Compliance Officer as the individual vested with responsibility for the day-to-day operation of the compliance program.
- (3) Training and education of all covered persons on compliance issues, expectations, and Compliance Plan operation.
- (4) Establishment of communication lines to the Corporate Compliance Officer that are accessible to all covered persons, to allow compliance issues to be reported.
- (5) Fair and firmly enforced disciplinary policies, to encourage good faith participation in the compliance program by all covered persons, and to outline sanctions for:
 - a. Failure to report suspected problems;
 - b. Participation in non-compliant behavior; and
 - c. Encouraging, directing, facilitating, or permitting non-compliant behavior.
- (6) Systems for routine identification of compliance risk areas specific to NCP's activities and operations, including:
 - a. Self-evaluation of identified risk areas, including internal audits and, as appropriate, external audits; and
 - b. Evaluation of potential or actual non-compliance identified in self-evaluations and audits.
- (7) Implementing response systems that:
 - a. Respond to compliance issues as they are raised;
 - b. Investigate potential compliance problems;
 - c. Respond to compliance problems as identified in the course of self-evaluations and audits;
 - d. Correct identified problems promptly and thoroughly, and implement procedures, policies and systems as necessary to reduce the potential for recurrence;
 - e. Report compliance issues to the OMIG when required; and
 - f. Refund overpayments.
- (8) Non-intimidation and non-retaliation for good faith participation in the compliance program, including but not limited to:
 - a. Reporting and investigating potential compliance issues;
 - b. Participating in self-evaluations, audits, and remedial actions; and
 - c. Reporting illegal activities such as fraud to government officials.

The eight components of the Plan are more fully described in this document, and in other NCP policies and procedures that implement the Compliance Plan and integrate the Plan into NCP's operations.

2 Written Policies and Code of Conduct

The Code of Conduct sets forth the basic standards and principles that covered persons are expected to follow as they carry out their duties with respect to NCP. The Code of Conduct, part of the Compliance Plan, is accessible to all staff on the Public Folder. Additionally, it is reviewed in detail as part of compliance training.

The Code of Conduct is not intended to address every potential compliance issue that may arise in the course of NCP operations. NCP has adopted more detailed written policies governing particular aspects of its operations, which will be reviewed and updated regularly. Some of these policies are referenced in the Compliance Plan; others may be provided to covered persons individually. Covered persons are required to review and carry out their responsibilities in accordance with the policies applicable to their role with NCP.

Current NCP policies and procedures that address compliance areas include the Employee Handbook, Conflict of Interest, Consumer Privacy (including HIPAA compliance), Fiscal Policies and Procedures, Fraud and Abuse, Document Retention, Orientation, Unlawful Harassment, Participant Rights, Incident Management, and Progressive Discipline for Supervisory Staff. Additionally, each program has written procedures to address its specific compliance requirements.

As its Code of Conduct, NCP is committed to:

- Billing Accurately
- Providing Access to Necessary Services
- Prohibiting Kickbacks and Referral Fees
- Disclosing Conflicts of Interest
- Affording Equal Opportunity for Consumers, Employees and Contractors
- Maintaining the Confidentiality of Consumer Case Records
- Conducting all Business with Honesty and Integrity

2.1 **Billing Accurately**

NCP receives reimbursement from Medicaid for services provided to its consumers. NCP also receives payment from state and local government agencies for providing other items and services. Submitting accurate bills to government payers is one of NCP's key legal obligations.

All covered persons involved in documenting services and billing the government for services must ensure that they follow all applicable laws, rules, conditions of participation and interpretive guidance relating to the billing process. Among other things, covered persons must ensure that NCP:

- Bills only for services actually provided to consumers
- Bills only once for a service
- Bills only at a rate that is permitted under the applicable program
- Bills only for services provided by licensed personnel where required

It is critical that all services provided to consumers are appropriately documented in the case records. Such documentation is necessary to ensure that NCP can demonstrate that it has delivered such services in the event of a government audit or investigation.

The failure of a covered person to adhere to all applicable billing rules may subject NCP to substantial liability. Among other things, it is a violation of both the federal and the New York State False Claims Acts to knowingly submit a false or fraudulent claim for payment to federal, state, or local government entities. Other state and federal laws impose civil and criminal penalties on NCP and covered persons for improper billing activity.

If NCP retains a vendor to submit bills on its behalf, NCP may still be responsible for improper billing activity by the vendor. Accordingly, employees involved in delegating this function must provide clear direction to vendors on proper billing procedures and carefully monitor their performance.

2.2 Providing Access to Necessary Services

NCP is committed to ensuring that all consumers under its care receive prompt access to the full range of services to which the consumer is entitled under the applicable government program. All services must be prescribed and/or delivered by appropriately licensed or qualified personnel.

2.3 Prohibiting Kickbacks and Referral Fees

Employees, members of the board of directors, and contractors must be aware that the receipt or giving of gifts by NCP personnel may cause questions to be raised about relationships with NCP's vendors, governmental officials, or others with whom NCP interacts. NCP must always refrain from any activity that could be construed as an attempt to improperly influence these relationships, or that could create an appearance of impropriety. Individuals who are affiliated with or who transact business with NCP should not offer or receive a gift in circumstances where it could appear that the purpose of the gift is to improperly influence NCP's relationship with a vendor, regulator, or other person or entity.

Under the federal Anti-Kickback Statute, it is illegal for any person to knowingly and willfully solicit, receive, offer or pay anything of value to another person in return for the referral of a consumer, or in return for the purchasing, leasing, ordering or arranging for any item or service reimbursed by Medicaid. Penalties for violating the Anti-Kickback Statute include imprisonment, criminal fines, civil monetary penalties and exclusion from government health care programs. A similar New York law prohibits the exchange of remuneration for referrals for items or services covered by the state's Medicaid program. Under no circumstances may any NCP employee or Director solicit, receive, offer, or give anything of value in return for referral of a consumer or in return for the acquisition of goods or services.

All employees involved in purchasing items or services from vendors, or managing relationships or conducting business transactions with sources or recipients of consumer referrals must diligently avoid any appearance of impropriety in dealing with parties that do business or seek to do business with NCP.

An NCP employee shall not solicit or accept a gift of more than \$50 value under any of the following circumstances:

- if it could reasonably be inferred that the gift was intended to, or could be expected to, influence the employee in the performance of his or her duties; or
- if accepting the gift would conflict with the proper conduct of the employee's duties.

The term “gift” includes but is not limited to money, services, meals, refreshments, entertainment, and tangible items.

All questions concerning gifts and gratuities are to be directed to the Compliance Officer.

2.4 Disclosing Conflicts of Interest

A conflict of interest may arise when an employee or member of the board of directors stands to benefit personally from his/her association with NCP, or when an employee or board member is in a position to put personal interests above those of NCP. While conflicts can arise in many different contexts, in general, NCP expects that all employees and board members will put the interests of NCP ahead of their personal concerns and will not seek to benefit themselves at the expense of, or as a result of, their affiliation with NCP.

NCP has adopted a Conflicts of Interest Policy, separate from the Compliance Plan that sets out standards and procedures for identifying and managing conflicts of interest. Board members, management, and other key employees involved in procurement or certain other sensitive job duties are required to familiarize themselves with this policy and submit annual conflict of interest disclosure forms.

2.5 Affording Equal Opportunity for Consumers, Employees and Contractors

NCP is committed to serving all eligible consumers on an equal basis without regard to race, creed, color, age, nationality or ethnic origin, religion, sexual orientation, gender, disability, predisposing genetic characteristics, marital status, domestic violence victim status, or any other characteristic protected by applicable federal, state, or local law. Discrimination on these grounds is also prohibited in connection with the hiring and treatment of employees, consultants, and contractors. In addition, sexual harassment will not be tolerated. NCP does not condone and will not tolerate conduct that demeans or undermines individuals or that creates or encourages a hostile working environment. NCP seeks to create a safe and productive environment in which the dignity of each individual is fully respected.

2.6 Maintaining the Confidentiality of Consumer Case Records

All consumer case records must be kept confidential in accordance with applicable privacy laws and regulations. NCP is subject to the Health Insurance Portability and Accountability Act (HIPAA), which limits the use and disclosure of protected health information. NCP must also comply with special state confidentiality laws governing mental health records, alcohol/substance abuse-related information, and HIV-related information. NCP has adopted a comprehensive Consumer Privacy policy governing the use and disclosure of consumer records. All employees who have access to such records must familiarize themselves with this policy and adhere to its terms.

2.7 Conducting all Business with Honesty and Integrity

NCP is committed to conducting all of its activities with honesty and integrity. Employees are expected to act in a manner that promotes NCP's reputation as an organization that exceeds the strict requirements of the law and operates in accordance with the highest ethical standards.

3 Compliance Oversight

The Board of Directors has the ultimate responsibility for oversight of the Compliance Plan. The board considers compliance-related matters on a periodic basis and whenever warranted by circumstances.

The Corporate Compliance Officer has responsibility for the day-to-day operation of the compliance program. The Corporate Compliance Officer chairs the Compliance Committee and reports directly to the Chief Executive Officer. The Corporate Compliance Officer also makes reports to the Board of Directors as necessary, as requested, and as appropriate.

The Corporate Compliance Officer's responsibilities include:

- Overseeing the development and implementation of policies and procedures that govern NCP's compliance efforts;
- Coordinating various functions, such as auditing, training, reporting, following up with investigations, and making recommendations for corrective action;
- Implementing plans for correction of deficiencies;
- Overseeing administration of agency risk assessment relative to compliance issues;
- Developing and implementing internal audit procedures relative to compliance issues;
- Maintaining a library of regulations, agency policies, and procedures;
- Overseeing the implementation of the compliance training program, in conjunction with Human Resources and others;
- Investigating matters related to compliance issues;
- Ensuring proper reporting of violations to enforcement agencies as appropriate; and
- Developing and implementing communication channels which encourage individuals to report potential problems without fear of retaliation.

The Compliance Committee is a steering committee consisting of the Chief Executive Officer, the Director of Finance, Human Resources, the Director of Rehabilitation Services, the Director of Development, the Corporate Compliance Officer, and such other NCP employees as the Chief Executive Officer may designate.

Compliance Committee functions include, but are not limited to:

- Receiving regular reports from the Corporate Compliance Officer and providing guidance regarding the operation of the program;
- Approving the internal auditing plan carried out under the Program;
- Approving the compliance training program provided to all covered persons;
- Reviewing and confirming the adequacy of all investigations of suspected non-compliance and any corrective action taken as a result of such investigations;
- Reviewing policies and procedures related to compliance; and
- Recommending and approving any changes to the program.

The Compliance/Human Resources/Legal Committee of the Board of Directors consists of a small group of board members to which the Corporate Compliance Officer makes reports on a regular basis. This committee or the Board President communicates to the board on a regular basis.

Corporate Compliance/Human Resources/Legal Committee functions include, but are not limited to:

- Reviewing significant or sensitive personnel or compliance issues that require a higher level of scrutiny or that might impact the liability or viability of NCP.
- Reviewing and confirming the adequacy of all investigations of non-routine compliance issues and any corrective action taken as a result of such investigations.

4 Training and Education

Training regarding compliance issues, expectations, and the compliance program operation will be presented to directors, those employees for whom it is required, accounts payable vendors, consultants, volunteers, student interns, and contractors, to an extent and in a manner pertinent to their NCP responsibilities. Compliance training will emphasize NCP's commitment to compliance. The Corporate Compliance Officer or Human Resources will provide initial training as part of orientation for all new employees, directors, volunteers, and student interns via Corporate Compliance Plan distribution, or more extensive training. The Corporate Compliance Officer will provide initial training for all new consultants, contractors, and accounts payable vendors. Periodic retraining will be provided, for those individuals who require it, on a regularly scheduled basis and as needed to respond to identified risk areas and to implement new requirements.

Training objectives will be established periodically by the Corporate Compliance Officer, based on auditing and monitoring results, problems identified through Compliance Plan operation, changes in applicable laws and regulations, and the Corporate Compliance Officer's assessment of risk areas.

The Corporate Compliance Officer will determine:

- Individual or group training needs; and
- The type of training that best suits the needs of NCP and accomplishes training objectives while managing the impact of training time on NCP operations.
- Written records of training will be maintained.

5 Effective, Confidential Communication

NCP maintains an “open door” policy toward covered persons, especially in areas concerning compliance. It is NCP’s intention to foster a culture that encourages questions and reporting. Any communication brought to the attention of the Compliance Officer, especially regarding possible violations of the Compliance Plan or Code of Conduct, will be investigated thoroughly and fairly.

Covered persons are required to promptly report any suspected improper activity of which they become aware in one of the following ways:

- Notifying their supervisor, manager, or director;
- Notifying the Corporate Compliance Officer
 - RICHARD STROHL, (518) 465-5201, rjstrohl@northeastcareer.org
- Notifying any other member of the Compliance Committee; or
- Filing a report through the Compliance Hotline, anonymously or not
 - Dial (518) 465 - 5202 ext. 111

Covered persons may report compliance concerns in any fashion with which they are comfortable, including face-to-face, telephone, written communications, and e-mail. Employees who wish to anonymously report suspected violations of the Compliance Plan or Code of Conduct may do so through the Compliance Hotline or in writing to the Compliance Officer.

NCP will make every reasonable effort to maintain in confidence the identity of any individual who reports possible misconduct, to the extent consistent with NCP’s obligations to investigate the report, take corrective action, cooperate with government agencies, and comply with applicable laws.

6 Consistent, Continuous Enforcement

NCP will consistently and appropriately enforce standards through its systems of discipline and training.

As previously discussed in the Compliance Plan, education regarding compliance expectations will be formally provided on a regular basis. Additionally, a culture of integrity which promotes quality and excellence will be championed. This will encourage individuals to take personal responsibility to help NCP operate legally and ethically. Accountability and responsibility for complying with NCP policies and procedures will be part of employees’ performance appraisals as well as part of expected business practice for vendors, consultants, and the board of directors. Posters, e-mails, recognition of excellence, and compliance competitions will all be periodically considered for inclusion in NCP’s culture of integrity.

Violations of NCP compliance policies, including failure to report potentially fraudulent or unlawful conduct, will result in disciplinary action, in proportion to the seriousness of the violation, in accordance with NCP’s Human Resources policies and procedures. Violations that may result in disciplinary action include but are not limited to:

- Failing to report suspected compliance violations;
- Participating in non-compliant behavior; and
- Encouraging, directing, facilitating or permitting non-compliant behavior.

7 Auditing and Monitoring

NCP seeks to monitor standards, identify compliance risk areas, and identify errors and compliance issues at an early stage before they develop into significant legal problems.

One of the key methods of achieving this goal is the performance of regular audits (pre-billing validations). Pre-billing validations are conducted by staff knowledgeable in Mental Hygiene and Medicaid requirements prior to submission to the billing office. The Corporate Compliance Officer reviews a portion of the pre-billing validations also. At the beginning of each year, the Corporate Compliance Officer develops a work plan for a schedule of internal audits. The work plan is approved by the Compliance Committee. The validations cover aspects of NCP's operations that pose particular risk of non-compliance, such as Medicaid billing, documentation of services, and authorizations for service. All employees are required to participate in and cooperate with internal audits as requested by the staff conducting the pre-billing validation or as requested by the Compliance Officer. This includes assisting in the production of documents, explaining program operations or rules, and implementing any corrective action plans. Any employee who fails to provide such cooperation may be subject to disciplinary action, up to and including termination.

Another key method of achieving this goal is the performance of supervisory reviews of case records for billing and quality standards and for identification of compliance risk areas in selected programs.

Other routine, on-going and focused audits will be performed on a program-specific basis as needed. External audits will be recommended as warranted, by the Compliance Officer.

Additionally, the compliance landscape will be routinely monitored by the Corporate Compliance Officer by examining the OMIG Work Plans and audits, internal and external audits of NCP's operations, prior problem areas, and industry guidance.

8 Responding to Compliance Issues and Implementing Corrective Action Plans

NCP is committed to taking prompt corrective action to address errors, fraud, abuse, or other improper activity identified through internal audits, investigations, and reports by employees or other means. All reports of suspected compliance problems will be reviewed and evaluated by the Compliance Officer/Human Resources swiftly, thoroughly, and fairly.

The Corporate Compliance Officer determines, in consultation with other NCP personnel, as necessary, such as Human Resources, managers, directors, Chief Executive Officer, and legal counsel as appropriate, whether the report warrants an internal investigation. The Compliance Officer/Human Resources coordinate the investigation and propose corrective action, when warranted. In cases involving apparent fraud or illegality, the Corporate Compliance Officer has the authority to order interim measures while investigation and recommendations for corrective action are pending. Corrective action plans developed as a result of an investigation are reviewed and approved by the Chief Executive Officer or by the Compliance Committee in the event that the Chief Executive Officer is absent or approval is delayed. The Compliance Committee reviews the effectiveness of corrective actions, both individual and systemic.

Corrective action plans will correct the current problem, improve controls to avoid the problem in the future, establish accountability and responsibility, and establish audit protocols to confirm the effectiveness of the individual and systemic changes.

Corrective action may include, but not be limited to, any or all of the following:

- Modifying NCP's existing policies, procedures, or business practices;
- Providing additional training to employees, contractors, or board members;
- Seeking interpretive guidance on laws and regulations from government agencies;
- Disciplining or terminating employees or others;
- Notifying law enforcement authorities of unlawful activity by employees, contractors, or others;
- Returning overpayments or other funds to which NCP is not entitled to the appropriate government agency or program; and
- Self-disclosing fraud or other illegality through state self-disclosure protocols.

9 Non-intimidation and non-retaliation

Covered persons who participate in good faith in the compliance program will not be subject to any form of intimidation or retaliation by NCP as a result of such participation. Protected activities include reporting and investigating potential compliance issues; participating in audits, investigations, and remedial actions; and reporting illegal activities to government officials. However, any person who deliberately makes a false accusation with the purpose of harming or retaliating against another person, or who willfully abuses the anonymous reporting system, may be subject to disciplinary action, up to and including termination.

Any person who has a concern about potential intimidation or retaliation is encouraged to contact the Corporate Compliance Officer or Human Resources.

AGENCY CORPORATE COMPLIANCE OFFICER

Richard Strohl

(518) 465-5201

rjstrohl@northeastcareer.org

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Corporate Compliance Plan Acknowledgment and Receipt

I have received my copy of the Corporate Compliance Plan.

The Corporate Compliance Plan describes important information about Northeast Career Planning, and I understand that I should consult my manager or the Corporate Compliance Officer regarding any questions not answered in the plan.

This plan and the policies and procedures contained herein supersede any and all prior practices, oral or written representations, or statements regarding the terms and conditions of my relationship with Northeast Career Planning. By distributing this plan, the company expressly revokes any and all previous policies and procedures that are inconsistent with those contained herein.

I understand that, except for employment-at-will status, any and all policies and practices may be changed at any time by Northeast Career Planning. All such changes will be communicated through official notices, and I understand that revised information may supersede, modify or eliminate existing policies. Only the Chief Executive Officer has the ability to adopt any revisions to the policies in this plan.

I have received the plan, and I understand that it is my responsibility to read and comply with the policies contained in this plan and any revisions made to it.

Employee's Signature

Employee's Name (Print)

Date

TO BE PLACED IN EMPLOYEE'S PERSONNEL FILE