



Corporate Compliance Program

Purpose: Imagine the Possibilities Corporate Compliance Program is the internal control to monitor adherence to applicable statutes, regulations, guidelines, quality consumer services, and in turn avoid federal and state allegations of fraud and abuse. It assists us in better understanding and monitoring of the overall operations and to monitor, on an ongoing basis, compliance with applicable laws and policies and procedures.

Overview:

1. Imagine the Possibilities is dedicated to the delivery of services in an environment characterized by strict conformance with the highest standards of accountability for administrative, business and financial management.
2. The leadership of Imagine the Possibilities is aware of and fully committed to the organization in clearly establishing expectations regarding employee behavior, e.g. to act in a way that always respects laws and regulations and in a manner that will protect the organization's assets from fraud, waste, and abuse as well as the development and implementation of policies and procedures and other corporate compliance measures to help ensure regular monitoring and conformance with all legal and regulatory requirements.

Quality Assurance and Corporate Compliance Committee and Officer:

3. Imagine the Possibilities Quality Assurance and Compliance Committee fulfills a proactive quality assurance and compliance oversight function for Imagine the Possibilities by creating a culture of compliance through a team approach with effective processes and activities.
4. The Quality Assurance and Compliance Committee consist of a statewide organization committee as well as a subcommittee at each region to help assure effective quality assurance and compliance activities throughout the organization at every level. Members of the committees are committed to building a culture of quality services and compliance. The Quality Assurance Corporate Compliance Committee, subcommittees and Corporate Compliance Officer have the authority and responsibility for overseeing the development, implementation and maintenance of Imagine the Possibilities Corporate Compliance Program.
5. The statewide committee provides quality assurance and compliance oversight for the entire organization. This committee reviews statewide organizational dashboard information to identify trends and to help ensure compliance consistency throughout all regions. The Committee representation consists of the Executive Director, Regional Executive Directors, Chief Operating Officer and the Corporate Compliance Officer. Ad hoc members such as legal counsel may also be in attendance as needed. This committee meets on a monthly basis.

6. The Regional Quality Assurance and Compliance subcommittees provide quality assurance and compliance oversight for the region. The subcommittee reviews the regions dashboard information and focuses on the regions quality assurance and compliance activities. Committee members will be involved in the implementation of quality assurance processes/checks, review and creation of quality assurance and compliance policies and procedures, creating activities to promote culture of compliance such as Compliance and Ethics Week, as well as being a role model for the region in “doing the right thing” to make Imagine the Possibilities a great place to work and receive services from. The subcommittee consists of a Chairperson that is the liaison to the Corporate Compliance Officer for quality assurance and compliance activities for the region. The committee will also have representation from various departments within that region; Direct Support Professional, Office/HR, Health Services, and Management. The cross section of representation on the committee helps promote a teamwork approach in creating and maintaining a culture of compliance. This committee meets on a monthly basis. Members may also be involved in other quality assurance and compliance activities throughout the month such as quality assurance checks, inputting dashboard information, etc.
7. A meeting agenda will be followed at all committees which identifies all regularly scheduled topics for the meetings to assure consistency in the quality and compliance oversight for the organization amongst all regions. Minutes of Quality Assurance and Compliance meetings will be kept. Copies of each meeting will be routed to the Regional Executive Director and Compliance Officer. Copies will be maintained by the agency indefinitely.
8. All Imagine the Possibilities employees play a critical role in the organization’s commitment to ethical and legal compliance and to the success of the Corporate Compliance Program. The following committees/teams are established to implement and oversee processes to monitor and measure the overall effectiveness of the Corporate Compliance Program:
 - Board of Directors
 - Cabinet Team
 - Quality Assurance and Corporate Compliance Committee and Regional Subcommittees
 - Safety Committee
 - Human and Legal Rights Committee
 - Resident Advocate Committee

Code of Conduct “Do What’s Right” and Code of Ethics “What We Value”:

9. Imagine the Possibilities has adopted a Code of Conduct and Code of Ethics that sets forth the legal and ethical standards of the organization, to be followed throughout the organization for the purpose of reducing unlawful or unethical conduct in the workplace. Initially upon hire and each year all employees and board members will receive and review the Code of Conduct and Code of Ethics.

Core Compliance Policies and Guidelines:

10. In addition to the Code of Conduct and Code of Ethics, Imagine the Possibilities I has a set of core compliance policies/guidelines within the various department policies/guidelines to assist in maintaining the highest level of ethical and legal business practices. They are as follows:
 - Conflict of Interest Policy

- Whistleblower-Detecting and preventing Medicaid Waste, Fraud and Abuse Policy
- Record Retention including Fiscal, Human Resource and Consumer Records
- Billing/Claim Submission policies refer to Fiscal Management, Consumer Receivables and Self Disclosure, Census Reports, Admissions/Discharges/Denials of Payment
- Health Insurance Portability and Accountability Act policies
- Investigations
- Employee Screening policies
- Coaching/Disciplinary Action
- Business Associate Agreement

Departmental Policies and Guidelines:

11. The Code of Conduct, Code of Ethics, Core Compliance Policies and Compliance Program are not all inclusive to ensure clarity of and adherence to legal and ethical requirements. The following departmental policies and guidelines are available to reference for further clarification to specific areas of the organization’s operations.
- Board Policies
 - Administrative Policies
 - Intermediate Care Facility for Intellectual Disabilities Policies
 - Home and Community Based Services Policies
 - Department specific Procedures and Guidelines Manuals; Day Services, Health Services, Human Resource/Fiscal, Residential and Social Services

Employee Training:

12. New employees will receive compliance training during orientation and annually thereafter. In addition to the compliance training, the following training is completed/implemented as part of the ongoing Corporate Compliance Program:
- New board member training
 - New employee training
 - Department specific orientation including department’s policies and procedures
 - On-going employee trainings
 - Attendance at conferences and webinars on compliance topics.
 - Leadership positions and the Compliance Officer attends IACP (Iowa Association of Community Providers) monthly meetings
 - Compliance Officer is member of the Health Care Compliance Association
 - Subscribe to OIG’s (Office of the Inspector General) email list and monitor website to stay up to date.

Communication:

13. To assure open lines of communication for a strong Compliance Program the following is listing of communication processes:
- Grievance Policy
 - Access to On-Call Personnel 24 hours a day, seven days a week
 - Imagine the Possibilities, website with contact information
 - Annual Employee and Consumer Satisfaction Surveys

- Monthly Safety Committee Meetings
- Quarterly meetings with Board of Directors
- Imagine the Possibilities is committed to non-retaliation and to maintaining confidentiality and anonymity. Report any violations or concerns through the compliance hotline (1-855-661-2667). All hotline calls will be processed and investigated according to policy even if reported anonymously

Investigations:

14. Investigation guidelines will be followed to ensure that a prompt and confidential investigation is conducted in response to a reported concern or other detected violation of the Code of Conduct, Code of Ethics, the Corporate Compliance Program policies and procedures, departmental policies and procedures or the laws and regulations governing Imagine the Possibilities. All employees are expected to cooperate fully in an investigation. Failure of an employee to cooperate may lead to coaching/disciplinary action up to and including termination. Retaliation against any employee who cooperates in an investigation is strictly prohibited and will lead to disciplinary action, up to and including termination.
15. Continuous and ongoing internal and external audits of processes help to assure and measure effectiveness of the Compliance Program. They are listed in:
 - Imagine the Possibilities Overview of the Quality Assurance Activities and Compliance Standards identifying benchmarks.
- 16 Any violation of the Compliance program will be dealt with pursuant to Imagine the Possibilities coaching/discipline process as outlined in the employee handbook.

Monitoring and Risk Assessment:

17. Imagine the Possibilities Compliance Plan is monitored monthly by the Quality Assurance and Compliance Committee. A risk assessment is also completed by the Quality Assurance and Compliance Committee through the use and completion of the specific years Review of Quality Assurance and Compliance Activities form. Imagine the Possibilities Board of Directors and Administrative Team annually complete a risk assessment. The Compliance Plan and Quality Assurance activities are revised as needed to be proactive in the compliance of the organizations operation.