Corporate Compliance Program

Purpose

Imagine the Possibilities' Corporate Compliance Program is the internal system of controls designed to monitor adherence to applicable statutes, regulations, and guidelines as well as the delivery of quality services; thereby avoiding allegations of fraud and abuse at both federal and state levels. It assists us in better understanding and monitoring our overall operations and to monitor compliance with applicable laws, policies, and procedures on an ongoing basis.

Overview

1. Imagine the Possibilities is committed 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. Imagine the Possibilities is committed to establishing clear expectations regarding employee conduct aimed at protecting the organization and its assets from fraud, waste, and abuse.

3. Imagine the Possibilities is committed to 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.

Compliance Program Personnel Designations

- Compliance Officer – Jeff Morris
- Privacy Officer – Shelley Dirth
- Security Officer – Chris Pletz
- Chief Quality Officer – Michelle Phillis

The Quality Assurance and Compliance Committee (QACC)

1. The Quality Assurance and Compliance Committee (QACC) structure is aimed at creating and supporting a culture of compliance through a team approach.

2. The QACC structure consists of both a statewide committee as well as committees in each region. This structure is designed to support effective quality assurance and compliance activities throughout the organization at every level. The Corporate QACC and the regional committees, directed by the Quality Department and the Corporate Compliance Officer, are responsible for overseeing the development, implementation and maintenance of Imagine's Corporate Compliance Program overall.

3. Regional QACC Dashboards are developed to track and analyze identified quality and compliance-related metrics. Data on the dashboard is provided by regional leadership along with corporate leaders by department as indicated.

4.   The Corporate QACC reviews statewide organizational dashboard information to identify trends and to help ensure consistency in compliance throughout all regions. The Corporate Leadership Team (comprised of the Executive Leadership Team and all Regional Executive Directors) serves as the Corporate QACC. Ad hoc members such as legal counsel may also be in attendance as needed. This committee meets on a regular basis.

5.   The Regional QACCs provide quality assurance and compliance oversight for the region. The committee reviews the region's dashboard information and focuses on the region's quality assurance and compliance activities. Committee members will be involved in the implementation of quality assurance processes and checks; the review and creation of quality assurance and compliance policies and procedures; and the planning of activities to promote a culture of compliance. The subcommittee consists of a Chairperson that is the liaison to the Corporate QACC and Compliance Officer. The committee will also have representation from various departments within that region. Members may also be involved in other quality assurance and compliance activities throughout the month such as quality assurance checks, inputting dashboard information, HIPAA checks, etc. This committee meets on a monthly basis.

6.   A standard meeting agenda will be followed at all committee meetings to assure consistency across all regions. Minutes of QACC meetings will be maintained on a shared drive. Committee records and documentation will be maintained by the agency indefinitely.

7.   Imagine's Quality Department provides direction to the Regional QACCs regarding activities and processes that monitor and promote quality in service delivery. The Corporate QACC | Corporate Leadership Team analyzes statewide QACC and Quality of Care Dashboard data and measures key performance indicators on a regular basis. These quality-related activities are considered complementary to the compliance-related activities described in this document but are not described in detail herein.

The Compliance Log

1.   Each region maintains a log of compliance-related incidents that are found or reported. Each log entry is to provide

    •   the date of the entry
    •   the basic information reported
    •   an indication of whether or not an investigation is needed
    •   an indication of whether the incident is Compliance and/or HIPAA related
    •   a summary of any investigations, outcomes, and any related corrective action taken including employee coaching and/or disciplinary action.

2.   The compliance log is maintained exclusively by the region's Compliance Liaison and monitored regularly by the Compliance Officer.

3.   The Compliance Officer maintains a Corporate Compliance Log for compliance-related incidents that happen in corporate level departments or involve corporate level employees.

Compliance is Everyone's Responsibility
All employees play a critical role in the organization's commitment to ethical and legal practices and to the success of the Corporate Compliance Program. The following committees and teams are identified as key elements in the overall effectiveness of the Corporate Compliance Program:

- Board of Directors
- Executive Leadership Team
- Corporate Leadership Team | Corporate QACC
- Regional QACCs
- Safety Committees (corporate and regional)

Code of Conduct and Code of Ethics
Imagine has adopted a Code of Conduct and Code of Ethics that set forth the legal and ethical standards of the organization, engaged for the purpose of preventing unlawful or unethical conduct in the workplace. Initially upon hire and annually thereafter, all employees and board members will receive and review the Code of Conduct and Code of Ethics, including an acknowledgment and commitment to adherence.

Core Compliance Policies and Guidelines
In addition to the Code of Conduct and Code of Ethics, Imagine has developed a set of core compliance policies and guidelines to promote 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 and Destruction Policy
- Billing and Claim Submission Policies
- Health Insurance Portability and Accountability Act (HIPAA) Policies including policies on Business Associate Agreements and Security Assessments
- Investigation Policies and Guidelines
- Employee Screening Policies
- Coaching and Disciplinary Action Policies

Departmental Policies and Guidelines
The Code of Conduct, Code of Ethics, Core Compliance Policies and this Corporate Compliance Program document are not all inclusive in Imagine's efforts to ensure clarity of and adherence to legal and ethical requirements. The following departmental policies and guidelines are available to reference for further clarification regarding specific areas of the organization's.

- Board Policies
- Administrative Policies
- Residential Care Facility for Persons with Mental Illness Policies
- Home and Community Based Services Policies
- Department specific Procedures and Guidelines for areas like Day Services, Health Services, Human Resources, Business & Accounting, Residential and Social Services

Employee Training

New employees will receive compliance training during orientation and annually thereafter. In addition to the compliance training, the following training is completed as part of the ongoing Corporate Compliance Program:

- Annual board member training
- Department specific orientation including department's policies and procedures on items such as documentation of service provision.
- Ongoing employee trainings driven by need according to dashboard and compliance log review.
- Attendance at conferences and webinars on compliance topics.
- Member in the Health Care Compliance Association (Compliance Officer)
- Monitoring of OIG's emails and website to stay up to date.

Communication

To assure open lines of communication for a strong Compliance Program the following elements are implemented:

- Grievance Policy
- Access to On-Call Personnel 24 hours a day, seven days a week
- Publication of this Corporate Compliance Program, Imagine's Notice of Privacy Practices, and appropriate contact information on the agency's website (www.imagineia.org)
- Annual Satisfaction Surveys for Employees and Individuals Served
- Monthly Safety Committee Meetings
- Quarterly meetings with the Board of Directors
- Commitment to non-retaliation and maintaining confidentiality and anonymity.
- Compliance Hotline – Employees are invited to 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

1. 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, departmental policies and procedures or the laws and regulations governing Imagine. All employees are expected to cooperate fully in any investigation. Failure of an employee to cooperate may lead to coaching and/or 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.

2. Continuous and ongoing internal and external audits of processes help to assure and measure effectiveness of the Compliance Program. They are listed in:

- Imagine Overview of the Quality Assurance Activities and Compliance Standards identifying benchmarks.

3. Any violation of the Compliance program will be dealt with pursuant to Imagine coaching/discipline process as outlined in the employee handbook.

Monitoring and Risk Assessment

1. The Corporate Compliance Program is monitored regularly by the Corporate Compliance Officer and the overall QACC structure.

2. The Executive Leadership Team will annually engage in a risk assessment with reporting to the Board of Directors. This assessment may be a general, overall assessment or a targeted assessment determined as needed through ongoing data analysis. Whenever possible and practicable, a third party will be engaged in leading the team through this assessment activity.

3. The Corporate Compliance Program and related activities are revised as needed in response to the monitoring and assessment activities listed above.