

**Corporate Compliance Plan**

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**OVERVIEW**

Since 1942, Villa of Hope (the “Villa”) has taken pride in offering high quality care, education and services to the children and families on Rochester community. As with any vital and vibrant organization, however, the Villa cannot be content with the status quo, but rather must focus on the future. To preserve and enhance our well-deserved reputation, everyone associated with the Villa must share a commitment not only to our clients and our work but also to compliance with the numerous laws, regulations, and policies that govern our conduct.

To assist us in our compliance goals, we have developed the Villa Compliance Plan. In that Plan, we have briefly summarized the internal and external provisions that govern various legal and ethical requirements we must meet. The Plan is expected to serve as a useful guide to assist us and you in identifying and addressing those instances where there may not be compliance with the law or with Villa policy.

The failure to follow existing law can damage our reputation and threaten our ability to carry out our mission. Unlawful behavior also may result in criminal liability and civil fines and penalties. Individuals who knowingly violate or recklessly disregard this Compliance Plan, the Code of Ethical Conduct, or the laws, regulations and policies which govern the Villa and those who fail to report or who participate in, encourage, direct, facilitate or permit non-compliance behavior will face severe consequences including termination.

We recognize that our ability to achieve compliance with the law depends upon our ability to recognize, avoid and remedy existing problems. Our compliance, therefore, depends not only upon a choice to “follow the rules” but also our obligation to our mission, our agency, each other, and all those who serve the Villa in any capacity, to comply with the laws and to bring all issues of potential concern to the attention of a supervisor or to a Villa Compliance Committee member (see “Discharging Your Obligations,” below). In return, you have our commitment that the issues you raise will be promptly and properly reviewed and that appropriate corrective action will be taken where necessary. Most important, you will not in any way be subject to any adverse consequences for making good faith reports; to the contrary, we view the failure to bring appropriate concerns to our attention to be a serious breach of your obligations that could lead to disciplinary action.

In short, we commend and will support strongly those who make the proper choices at the Villa, and will hold accountable those persons who make inappropriate choices or those who turn a blind eye toward improper conduct. Through our collective efforts, we are confident that we can and will enhance our existing reputation for excellence.

**DISCHARGING YOUR OBLIGATIONS**

We recognize that there may be instances where you learn of practices at the Villa that may be of concern to you. While there are many different ways for you to address those concerns, we recognize that your choice will likely depend upon your relationship with the particular employees, independent contractors or vendors involved in the conduct at issue; upon your relationship with your supervisors; or upon your knowledge of the laws, regulations and policies governing the practice that is of concern to you. We wish to assure you that this Compliance Plan as well as the Compliance Committee (see “Compliance Committee and Compliance Officer”, below) exist to help you when you are unable, for any reason, to assure yourself that the conduct in question is in fact appropriate, or if you believe that the problem has not been effectively remedied. In those instances, we fully expect that you will promptly inform your supervisor, if appropriate, or the Compliance Committee of the issue. That Committee is composed of senior members of the Villa administration who are committed to ensuring full compliance with all existing laws, rules, regulations, protocols and policies that govern us.

**The Compliance Committee and Compliance Officer**

The Villa Compliance Committee is comprised of a subsection of the members of the Performance Quality Improvement Committee (See Attachment A) and has been formed to aid in identifying any potential areas of non-compliance through audits, to assist in investigating areas of concern raised by our employees or by others, and to remedy any deficiencies. The Compliance Committee will meet quarterly or more frequently as necessary. The Compliance Committee is responsible for overseeing the development and implementation of policies and procedures for the Compliance Plan, informing employees and independent contractors of this Compliance Plan, ensuring that training is provided regarding specific job responsibilities and requirements, conducting audits and monitoring employees responsible for coding and submitting claims for reimbursement. These policies and procedures will be reviewed at least annually and revised if necessary. The Committee’s work is intended to be and will be confidential and privileged. If requested, the Committee also will make all reasonable efforts to protect the identity of the reporting employee or individual. When the Committee completes any necessary investigation, or implements any necessary steps to address the problems detected, the Committee will, whenever appropriate, inform the reporting employee or independent contractor of the result of the investigation and of any action taken concerning the issue presented. The Committee will review and, if necessary, modify this Compliance Plan annually.

The Compliance Officer reports directly to the Board of Directors of the Villa. The Compliance Officer will chair the Villa Compliance Committee. The Compliance Committee members including the Compliance Officer are listed, along with their telephone numbers, in Attachment A to this Compliance Plan document.

**The Process**

All Villa employees and independent contractors are strongly encouraged to bring concerns to the attention of the Compliance Officer or any member of the Compliance Committee. Reports may be made in person, in writing, or over the telephone to the individuals listed in Attachment A**.** Written communications should be marked “CONFIDENTIAL AND PRIVILEGED MATERIAL PREPARED FOR LEGAL COUNSEL.” Although reports may be made anonymously to the Compliance Hotline (585-581-4699 or ext. 221 if calling internally), in order for the Compliance Committee to obtain more information from or respond to the reporting individual, he or she should provide his or her name and work location when the report is made.

All reports and communications received will be confidential and privileged to the extent permitted by law. Counsel for the Villa and the Compliance Committee will review reports and assist in deciding upon an appropriate investigation. The cooperation of the reporting employee or individual may be sought during any investigation, and such cooperation will be positively noted in the employee’s or individual’s file. Upon conclusion of the investigation, with the advice of legal counsel, the Committee will determine the necessary follow-up action to be taken. Any concerns about the Compliance Officer, the Compliance Committee members, or the Committee’s actions or determinations may be brought directly to the Board of Directors of the Villa.

**ELEMENTS OF VILLA OF HOPE**

**COMPLIANCE PLAN**

The following Compliance Plan summarizes the conduct we expect from all our employees and independent contractors, and highlights certain key areas where the potential for concerns may be significant. This Plan will not serve as a substitute for a thorough understanding of your job function, your obligations, and the laws and institutional policies that apply to your job. It will not constitute an excuse to avoid training or in-service presentations in your area. However, it can and should provide useful guidance, make you sensitive to potential problems you may face, and help you to avoid particular pitfalls.

**Key Areas**

Our agency is subject to many federal, state and local laws, together with various internal policies and protocols. We have attempted to summarize below the general obligations arising in key areas of our operations. The key areas are:

1. Code of Ethical Conduct

2. Discrimination and Employment

3. Fraud and Abuse

4. Conflicts of Interest

5. Gifts and Gratuities

6. Information Systems Issues

7. Billing

8. OSHA

9. Professional Licensure and Credentialing

10. Quality Assessment and Performance Improvement

11. Client Confidentiality

12. Client Rights

13. Record Retention and Maintenance

14. Reporting Requirements

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1. **Code of Ethical Conduct**

The Villa is committed to promoting the well-being of children, youth, and families in a context of respect and collaboration.  Employees, volunteers, interns, and independent contractors are expected to demonstrate a commitment to the ethical concerns for the child and youth care practice, concern with one’s professional conduct, encouraging ethical behavior of others, and consulting with others on ethical issues.  Through our commitment to Social Responsibility we must all hold ourselves and each other accountable to the Code of Ethical Conduct (Attachment B) and as such must report any actions or occurrences that are not in line with the Code.

We acknowledge that this field is difficult and chronic stress may occur and at times, we are all faced with decisions we would rather not have to make and issues we would prefer to avoid. At Villa of Hope, we must have the courage to tackle the tough decisions and make difficult choices; secure in the knowledge that Villa of Hope is committed to doing the right thing. At times this will mean doing more than simply what the law requires. Merely because we can pursue a course of action does not mean we *should* do so. Although Villa of Hope’s commitments can not address every issue or provide answers to every dilemma, they can define the spirit in which we intend to do business and should guide us in our daily conduct. Staff must report any actual or suspected violations of the Code of Ethical Conduct, any applicable law or regulation, or any Villa policy and procedure to their immediate supervisor or the Compliance Officer. Any staff member who violates or knowingly fails to report any violation of the Code of Ethical Conduct, any applicable law or regulation, or Villa policy, procedure, or practice is subject to appropriate disciplinary action, up to and including termination.

1. **Discrimination and Employment Issues**

The Villa is committed to equal opportunity and to the respect for human dignity. Unequal treatment or discrimination based upon gender, color, national origin, age, religious affiliation or belief, disability, sexual orientation, or other non-performance or ability-related grounds is unacceptable. We will hire, promote, retain and contract with individuals based upon their ability to meet bona fide occupational qualifications, and to effectively and efficiently discharge the obligations of their job. Similarly, we do not condone and will not tolerate conduct that demeans or undermines our clients, or that creates or encourages a hostile or oppressive working environment.

The Villa has developed and maintains various employment-related and independent contract-related policies that are available through supervisors. We expect that all employees and independent contractors will be familiar with and will adhere to these policies. Questions or concerns should be directed to a supervisor or Compliance Committee member.

1. **Fraud and Abuse**

Federal and state laws prohibit certain conduct by, and certain business arrangements for, agency providers such as the Villa. These include arrangements where goods, services, or office space are provided for some amount other than fair market value in return for referring a client for services or items. These kickbacks and other related practices are generally grouped under the heading “fraud and abuse.” While there are many practices that are prohibited or restricted, there are also several exceptions or “safe harbors” that apply under specified circumstances. The most common fraud and abuse issues arise in connection with referral practices and in vendor relationships.

As a general rule, you must avoid relationships with vendors or other third parties that appear to provide financial incentives for the use of their products or for the referral of clients to them. These incentives, moreover, are not necessarily in the form of cash payments, but may include consulting relationships, lease arrangements with vendors for other than fair market value, and gifts. A useful guide is to avoid arrangements that confer personal benefits to you over and above that which ordinarily would be provided for your services. You also should clear with your supervisor any proposed arrangement with clinicians, vendors, contractors or suppliers, or any rebate, bonus or volume discount proposals.

Client referrals to health care entities in which the referring clinician or a relative has an ownership interest also are prohibited under statutes commonly known as the “Stark” laws. There are several exceptions to the Stark prohibitions, but the appropriate course of action is to raise all issues in this regard with your supervisor. Any concerns regarding this area should be immediately brought to the attention of a supervisor or Compliance Committee member.

1. **Conflicts of Interest**

Any employee, independent contractor, intern or volunteer who has any interaction with a client or family member of a client for purposes other than Villa business must notify the treatment team for discussion and approval.

A conflict of interest may arise where an employee stands to benefit personally at the expense of the Villa, or where an employee is in a position to put his or her personal interests above those of the Villa. We believe strongly that all Villa employees, and independent contractors during the term of the contract, owe a duty of loyalty to the agency and, therefore, should avoid any actual or apparent conflicts of interest. While conflicts can arise in many different contexts, in general we expect that all employees and, independent contractors during the term of their contract, will put the interests of the Villa ahead of their personal concerns, and will not seek to benefit themselves at the expense of, or as a result of, their affiliation with the Villa. We expect all Villa employees and independent contractors will become familiar with and obey policies in this area. Suspected violations should be reported immediately to a supervisor or Compliance Committee member.

1. **Gifts and Gratuities**

You should be aware that the receipt or giving of gifts by Villa personnel may raise questions about relationships with our vendors, governmental officials, or others who interact with the Villa. We must always refrain from activities that could possibly be construed as an attempt to improperly influence these relationships. You should not offer or receive a gift in circumstances where it could appear that the purpose of the gift is to improperly influence the Villa’s relationship with a vendor, regulator, or other person or entity.

It is the Villa’s policy to reimburse its employees for all reasonable expenses, including meals, entertainment, and travel that are appropriately incurred while conducting Villa business. Rarely, therefore, will justification exist for you to permit someone else to pay for such items. We are confident that if you follow Villa policy and exercise reasonable judgment and common sense with respect to gifts and gratuities, you will avoid situations that might bring you or the Villa’s integrity into question. If you have any questions in connection with the receipt or offer of gifts or entertainment, you should consult the applicable Villa policy and your supervisor. Any concerns regarding violations of policy in this area should be brought to the attention of a supervisor or Compliance Committee member.

1. **Information Systems Issues**

One of our most valuable assets is our body of confidential information. As an agency employee or independent contractor, you are responsible for maintaining and protecting the information used by you in connection with your job duties. For example, you must not record inaccurate information, make inappropriate or unauthorized modifications of information, or destroy or disclose information, except as authorized. Additionally, no current employee or independent contractor, or former employee or independent contractor may, without the prior written consent of the Villa, use for their own benefit or disclose to others any confidential information obtained during employment or term of engagement.

Documents containing sensitive data, including information concerning clients, must not be left in public view or in an unsecured location. You also must be careful when you enter, secure, and store computer data. Given the widespread use of computers throughout the Villa, the potential for a breach of security exists and must be considered at all times. If you observe individuals whom you do not recognize using terminals in your area, immediately report this to your supervisor or to security. Any concerns regarding confidential information should be brought to the attention of a Compliance Committee member.

1. **Billing**

Many services provided by the Villa are paid for by government funds. While there are established particular billing formats, protocols, and practices with which all employees involved in the billing process must become familiar, there are certain common issues that are important to mention.

The Villa is prohibited from submitting false claims to obtain payment for the services we provide. False claims include claims for payment which the service provider knows are unwarranted and claims the service provider submits with reckless disregard for their accuracy or “deliberate ignorance” of the applicable guidelines. False claims can result in significant penalties and costs to the Villa. Obviously, therefore, the Villa is committed to ensuring that all claims for payment are proper, that they accurately reflect the services necessarily delivered, and that they comply with existing billing and coding regulations, bulletins, advisories and guidelines. If you are uncertain as to a particular charge or billing practice, or if you believe the documentation supporting a claim for payment may be inadequate, you should contact your supervisor for guidance. If you seek guidance and you remain concerned about any aspect of our billing, you should immediately bring that concern directly to a Compliance Committee member.

It is our intention to comply with all payor requirements. Where the requirements are unclear, as they occasionally are, you or your supervisor may ask the Compliance Officer to seek guidance from the payor directly. The advice given should be carefully recorded, including the name and title of the payor representative, and the time, date, telephone number and place of the communication. A letter should be sent to the payor representative via receipted mail confirming the advice. Copies of that letter, together with any relevant correspondence, will be maintained by the Compliance Officer.

Given the number of client encounters within our agency, and the occasional ambiguous, complex, or conflicting rules, there may be times when you discover an error in a previously submitted claim. You should immediately report that error to your supervisor so that it may be rectified. If you feel you are unable to make such a report to your supervisor for any reason, or if appropriate corrective action is in your judgment not taken, you should contact a Compliance Committee member immediately.

1. **Occupational Safety and Health Administration (“OSHA”)**

In our various client encounters, we occasionally encounter potentially harmful situations. The Villa expects that our employees will at all times follow safety procedures. The Villa is subject to numerous federal and state statutes and regulations related to workplace safety, and we expect compliance with all relevant provisions in this area. Should you suspect there may not be compliance, you should contact your supervisor or a Compliance Committee member.

1. **Professional Licensure, Certification and Credentialing**

All professionals providing client services must be fully capable of discharging their clinical responsibilities. No professional will be permitted to provide client services at or on behalf of the Villa unless it has been demonstrated that he or she possesses the required education, licensure or certification, and experience necessary to perform his or her clinical responsibilities. All providers affiliated with the agency shall be properly credentialed, and the Villa will maintain a file on each provider that contains documentation of the practitioner’s credentials.

In credentialing practitioners, the Villa shall take steps necessary to document the practitioner’s education, licensure or certification, and competency. In doing so, the Villa and personnel involved in the credentialing process shall comply with all applicable laws and regulations, and professional standards. If you become aware of any information or documentation indicating that anyone in the Villa has not adhered to the requirement for credentialing, licensure or certification, you should immediately bring it to the attention of a Compliance Committee member.

1. **Quality Assessment and Performance Improvement**

Quality service is the hallmark of the Villa, and each of us must strive to continually improve the quality of the services we provide and/or the job responsibilities we perform. It is expected that all Villa personnel and independent contractors, regardless of responsibility, participate as appropriate in our quality improvement efforts. We are each responsible for familiarizing ourselves with the quality assessment and performance improvement activities applicable to our position. To obtain information about the Villa’s overall quality improvement plans and activities, please contact your supervisor. Concerns about quality assessment or performance improvement issues should be directed to a Compliance Committee member.

1. **Client Confidentiality**

The Villa recognizes the paramount importance of confidentiality in the provision of agency services, and it is our policy to keep all information and records pertaining to a client’s treatment confidential in accordance with applicable law. All personnel and independent contractors with access to confidential information and records are required to strictly adhere to confidentiality policies of our agency. If you become aware of unauthorized or inappropriate disclosure by a Villa employee or independent contractor of confidential information or documents, you should contact your supervisor or a Compliance Committee member immediately.

1. **Client Rights**

The Villa recognizes that each client and their family are entitled to receive ethical treatment in accordance with accepted standards of care. It should be the express goal of all Villa personnel and independent contractors to treat all clients and their families with courtesy, compassion and dignity, while recognizing and honoring the client’s and family’s right to privacy and confidentiality. All agency personnel and independent contractors shall fully familiarize themselves with the rights of our clients, and conduct themselves at all times in a manner consistent with these rights. In addition, all agency staff and independent contractors involved in the delivery of client services shall attend periodic in-service training sessions or receive information dealing with clients’ rights requirements. If you become aware of any situation in which a client’s or family’s rights are being violated, you should immediately contact a supervisor or a Compliance Committee member.

1. **Record Retention, Completion and Maintenance**

The law requires the Villa to retain certain records and documents for specified periods of time. Our failure to retain these records as required could result in substantial monetary penalties, prevent us from having the documentation to prove what services were provided to a particular client, and raise questions about our agency ethics. In order to comply with these obligations, the Villa has implemented systems of controls and policies to assure proper maintenance, retention and destruction of records. You are expected to follow these policies. You are not, however, to destroy or discard any records if you know that they may be the focus of a pending investigation, or subject to a pending request. You should contact your supervisor or a Compliance Committee member in the event you learn of a potential violation of our policies.

Client records must also be timely completed and accurately maintained. These records provide a basis for future treatment decisions and support for billing, as well as an important historical account of the actions taken by Villa personnel that is critical to respond to claims made against us. Client records are confidential and must carefully and accurately document the services provided. There are specific protocols on the completion, maintenance, and modification of these records, and you are expected to comply fully with those protocols. A failure to do so can result in internal sanctions as well as professional licensure action. Should you suspect any violation of recordkeeping protocols, you should contact your supervisor or a Compliance Committee member immediately.

1. **Reporting Requirements**

Villa providers must adhere to many reporting requirements under state and federal law, and it is the policy of the Villa to comply with all reporting requirements. It is important that you be aware of any reporting requirements applicable to your job responsibilities. Reports to various governmental bodies are required to be made in certain circumstances including suspected abuse, mistreatment or neglect of a child; and threats to community safety.

If you are aware of any incident or situation that may require reporting to a governmental agency, you should report it directly, according to the obligations of your profession, or bring it to the attention of the person who is responsible for making such report. If you have any questions or concerns regarding our reporting responsibilities, you should contact your supervisor or a Compliance Committee member.

If any employee or independent contractor intentionally fails to make a required report to a governmental body or attempts to cover up facts that would warrant such a report, he or she will be subject to internal disciplinary action, including termination, and could also face criminal charges and the loss of his or her professional license or certification.

1. **Reviews and Inspections**

Our agency is reviewed and inspected by government agencies, which impose numerous recordkeeping and other requirements on us. You are expected to become familiar with these requirements as they affect your area, and to ensure compliance with them. Our failure to comply can lead to sanctions, to the implementation of detailed plans of correction and, in extreme circumstances, to the restriction of licensed services.

1. **Wage and Hour Issues**

As an employer, the Villa is required to comply with all applicable wage and hour laws, and other laws governing the employment relationship. You are entitled to receive fair and equitable wages in connection with your services to the Villa, and you may receive overtime pursuant to applicable federal and State wage and hours laws as well as Villa policies. You should report any suspected violation of the wage and hour laws, or other related provisions, to your supervisor or a Compliance Committee member; and you should not be subject to retaliation or adverse employment action for making such a report. You are encouraged to bring any concerns or dissatisfaction concerning wage and hour issues to a Compliance Committee member.

16. **Political Activities**

As a non-profit organization, the Villa is prohibited from engaging in any political campaign and substantial lobbying activities. Villa funds and resources, including work time, may not be used for political contributions or activities. In expressing personal political views or support or opposition to a candidate for public office, it must be very clear that such views are personal and not the view of the Villa. There are allowances for the Villa to advocate its position on public issues. To assure that the Villa does not violate any laws or regulations, or risk losing its tax-exempt status, the Compliance Committee must approve any lobbying activities.

17. **Government Audits and Investigations**

There may be times that the Villa is asked to cooperate with an investigation of fraud by a federal, state or local governmental agency, or to respond to a request for information. A request may be formally addressed to the Villa or an individual within the Villa. Staff must report any requests for information or cooperation with an investigation to the Compliance Officer immediately.

**CONCLUSION**

Villa of Hope hopes that this Compliance Plan provides useful and effective guidance to you. We are committed at all levels to ensuring that we comply with existing laws and ethical provisions, and we thank you for your cooperation and ongoing vigilance in this important effort.

Dated: May 2017

**VILLA OF HOPE COMPLIANCE PLAN**

**ATTACHMENT A**

**COMPLIANCE COMMITTEE**

COMPLIANCE OFFICER:

Angelica Perez (585) 865-1550

MEMBERS:

Christina Gullo (585) 865-1550

Michelle Lee (585) 865-1550

Anne Eichas (585) 865-1550

Aaron James (585)-865-1550

Effective Date: May 2017



**Code of Ethical Conduct**

Villa of Hope is committed to promoting the well-being of children, youth, and families in a context of respect and collaboration.  Employees, volunteers, interns, and independent contractors are expected to demonstrate a commitment to the ethical concerns for the child and youth care practice, concern with one’s professional conduct, encouraging ethical behavior of others, and consulting with others on ethical issues.

Villa of Hope’s Code of Ethical Conduct

* At Villa of Hope everyone should feel comfortable to speak his or her mind through our commitment to open communication, particularly with respect to ethical concerns.
* Employees, volunteers, interns, and independent contractors are responsible for knowing the difference between professional and personal relationships with clients and it is explicitly understood and respected and that the practitioner’s behavior is appropriate to this difference.  Sexual intimacy with a client or family member is unethical.
* Employees, volunteers, interns, and independent contractors must respect the privacy of clients and holds in confidence information obtained in the course of professional service.
* Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions.
* Retaliation against anyone who raises genuine ethics concerns in good faith will not be tolerated.
* To make our Code work, managers must be responsible for promptly addressing ethical questions or concerns raised by anyone and for notifying Human Resources or Quality and Compliance of the concerns.
* Employees, volunteers, interns, and independent contractors must maintain the highest standards of professional conduct, competence, and integrity.
* Above all Employees, volunteers, interns, and independent contractors must treat the youth and families with courtesy, respect, and caring.
* Employees, volunteers, interns, and independent contractors shall not participate in practices that are disrespectful, degrading, dangerous, exploitative, intimidating, psychologically damaging, or physically harmful to clients.
* Employees, volunteers, interns, and independent contractors are must recognize the professional responsibility to the client and therefore should advocate for the client’s best interest and personal rights.
* Employees, volunteers, interns, and independent contractors must ensure that services are sensitive to, respectful of, and nondiscriminatory of clients regardless of race, color, ethnicity, national origin, national ancestry, age, gender, sexual orientation, marital status, religion, abilities, mental or physical handicap, political belief, and socioeconomic status by obtaining training, experience, and counsel to assure competent service.
* Employees, volunteers, interns, and independent contractors must recognize that there are differences in the needs of children, youth, and families and meets those on an individual basis.

**Promote Substance over Form**

Through our commitment to Social Responsibility we must all hold ourselves and each other accountable to this Code of Ethical Conduct and as such must report any actions or occurrences that are not in line with this Code.

We acknowledge that this field is difficult and chronic stress may occur and at times, we are all faced with decisions we would rather not have to make and issues we would prefer to avoid.

At Villa of Hope, we must have the courage to tackle the tough decisions and make difficult choices; secure in the knowledge that Villa of Hope is committed to doing the right thing. At times this will mean doing more than simply what the law requires. Merely because we can pursue a course of action does not mean we *should* do so.

Although Villa of Hope’s commitments can not address every issue or provide answers to every dilemma, they can define the spirit in which we intend to do business and should guide us in our daily conduct.

Staff must report any actual or suspected violations of this Code of Ethical Conduct, any applicable law or regulation, or any Villa policy and procedure to their immediate supervisor or the Compliance Officer. Any staff member who violates or knowingly fails to report any violation of this Code of Ethical Conduct, any applicable law or regulation, or Villa policy, procedure, or practice is subject to appropriate disciplinary action, up to and including termination.