



## What is a Corporate Compliance Plan (“The Plan”)?

A corporate compliance plan is simply a written program to promote ethical behavior in the workplace and reduce the likelihood of abuse, fraud and health care violations.

## Why do we have a Corporate Compliance Plan?

Our Corporate Compliance Plan was implemented to ensure compliance with the complex health care laws and to set forth our policy and commitment to honest and ethical work behavior. The Plan will communicate to those associated with the agency what we are doing to comply with all laws and regulations and what we expect of staff, volunteers, and other agents who assist in the delivery of services to individuals.

## Who oversees The Plan?

The Director of Corporate Compliance oversees the Plan and reports directly to the President and the Board of Directors. The Director of Corporate Compliance works closely with the Vice President of Operations and the Vice President of Finance to provide training, address all compliance issues and maintain the Plan.



## Where is the Plan located?

The Plan is located in every department and service area and is always available for review upon request.

## When did the Plan begin?

The Plan began in November of 2004 and will remain effective indefinitely.

## Who needs to know about the Plan?

All employees, vendors, contractors, agents and volunteers of the agency are required to understand and comply with the Plan. Information specific to the Plan is distributed to everyone upon hire and as deemed necessary by the Director of Corporate Compliance for new developments or significant changes. Employees and volunteers will receive initial training on corporate compliance prior to hire/start date and annually thereafter. Professionals and vendors associated with the agency will receive information upon association with the agency and contract renewal.

## What if I have questions regarding the Plan?

Questions and concerns regarding the Plan should be directed to your supervisor and/or the Director of Corporate Compliance.

## What is my duty with respect to the Plan?

All employees, vendors, contractors, agents and volunteers of the agency have a responsibility to:

- ◆ Understand the standards and policies stated in the Plan.
- ◆ Comply with the Plan.
- ◆ Report suspected violations of the law and the Code of Conduct.

## How do I report suspected violations?

We want to hear from you! If you see or hear about something that appears to be out of the ordinary or may be a potential violation, we encourage you to discuss it with your supervisor or the Director of Corporate Compliance. We have an open door policy and a confidential reporting system because we care about what you think and your concerns. Employees, vendors, contractors, agents and volunteers may report their concerns or suspected violations confidentially to the Director of Corporate Compliance in any of the following ways:

- ◆ One-on-one discussion in person.
- ◆ Call the Director of Corporate Compliance at:  
(585) 402-7440 ext. 1848.
- ◆ Submit a completed compliance issue report in person or by mail (a mini version of the form is enclosed.)
- ◆ Call the help line number at:  
(585) 334-6000 ext. 2981.  
(All reporting may be anonymous)

