



COMPLIANCE AND ETHICS PROGRAM OVERVIEW

OVERVIEW

The LADD Compliance and Ethics Program (CEP) establishes the standards, policies and practices designed to provide guidance and communicate appropriate ethical and legal behavior for preventing fraud, abuse, waste and other unethical practices. All employees must commit to meeting the highest standards of ethical conduct. The CEP also exists to provide a process for the people we support, guardians, employees, personnel from other agencies, and community members to discuss or file complaints, grievances, violations, or problems with this organization or its employees, including Management, and to receive careful consideration and a prompt resolution.

The CEP is a collection of documents developed to help employees recognize and respond to some of the more sensitive and often problematic matters involved in conduct and ethics. The CEP specifies, where possible, actions and inactions that are contrary to and conflict with the duties and responsibilities of LADD employees. The CEP guides employees in conducting themselves and their work in a manner that reflects standards of behavior and professionalism as required by LADD.

Additional guidance on matters of conduct is provided in the Employee Handbook Code of Conduct. All employees of LADD are expected to follow ethical practices which means working and providing care in a way that is honest, legal and respectful of others; and reflects the Mission, Vision and Values of LADD. This is a requirement for employment.

LADD standards for excellence are based on honesty, integrity, fairness, respect, trust, responsibility, and accountability in operations, governance, human resources, financial management, community supports and fundraising.

CEP ELEMENTS

The CEP is based on the seven fundamental elements of an effective compliance program and also includes information related to HIPAA compliance. The CEP contains policies, procedures and forms related to compliance, employee conduct and the confidentiality of information. In order to organize and simplify the information contained in the CEP it is structured around each of the seven elements as follows;

- I. Designating a corporate compliance officer and compliance committee.
- II. Implementing written policies, procedures and standards of conduct.
- III. Conducting effective training and education.
- IV. Developing effective lines of communication.
- V. Conducting internal monitoring and auditing.
- VI. Enforcing standards through well-publicized disciplinary guidelines.
- VII. Responding promptly to detected offenses and undertaking corrective action.

SECTION I - Designating a Compliance Officer (includes the responsibilities of Privacy Officer and Security Officer) and a Compliance Committee

At LADD the role of the Privacy Officer and the Security Officer are included in the responsibilities of the Corporate Compliance Officer (CCO). The CCO is responsible for the oversight of the CEP, all related policies, procedures, revisions, training, auditing, monitoring, investigations and record maintenance and release of information. The CCO must be knowledgeable in all applicable standards and engage in ongoing training and education to prevent improper conduct, illegal activities, unethical behavior and improper record and asset management. The CCO has a direct reporting responsibility to the Board of Directors and the Executive Director so there is no actual or perceived conflict in investigating and reporting issues. The CCO has a job description and responsibilities specific to their position at LADD Inc. which includes;

- Providing ongoing training in compliance related matters, HIPAA/HITECH, Breach of Confidential Information, DRA, FCA including Fraud, Waste and Abuse and Whistleblowers to all employees.
- Collaborates with other departments to direct compliance issues to appropriate departments for investigation and resolution.
- Responds to alleged violations of rules, regulations, policies, procedures, and Standards of Conduct by evaluating or recommending the initiation of investigative procedures. Develops and oversees a system for uniform handling of such violations.

- Oversight of the Business Associate Contracting system.
- Prevention, detection and response to security events including breaches.
- Direct the release of information process.

The CCO is easily accessible to all stakeholders. Contact information for questions or filing a complaint is available;

- On the LADD Website and People Supported Website
- Available in all Programs
- Included in online training initially and annually
- Included in the Service Information Packets

Complaints may be made openly or anonymously to the CCO and will not result in retaliation by LADD or its employees. All stakeholders, including employees of LADD must immediately report to the CCO, any suspicion of fraud, waste, abuse or violation of confidentiality as it relates to protected health information.

LADD maintains a Compliance Committee/Steering Committee that consists of individuals within the corporation who are in a position to affect the culture of the organization, knowledgeable in the operation of the organization and possess a diverse background/area of specialty. The CCO is the chairperson of the committee and utilizes the committee's expertise to assist with implementation of the CEP. The Committee serves as a resource to the CCO to assist with;

- Communicating the corporation's practices
- Assessing the corporation's risk
- Developing policy and procedure
- Taking corrective action

In addition, the role of the entire team of leadership at LADD is to establish and maintain a culture of compliance and ethical conduct. LADD employees in Management and leadership positions are expected to:

- Serve as Compliance Liaisons at locations where LADD provides staffing supports. Compliance Liaisons are responsible for bringing compliance issues to the CCO, training related to corrective actions and facilitating stakeholder questions/concerns.
- Ensure those they supervise have information and are educated regarding applicable laws, regulations, and policies and legal requirements pertinent to their function.
- Inform all staff they supervise that strict compliance with policies and regulation is a condition of employment and violation will result in disciplinary action up to and including separation.
- Encourage the reporting and discussion of concerns related to legal and ethical practice; insure adequate follow up to concerns.
- Ensure that business practices do not compromise ethical behavior or our core values.

SECTION II – Implementing Policies, Procedures and Standards of Conduct

The LADD Employee Handbook Code of Conduct, the LADD Directory and Management Manual contain several policies and procedures that provide standards and guidance for employees and business operations. They are designed to help employees understand their rights and responsibilities, to work more efficiently and to provide care in an ethical way. These resources are readily accessible on line for employees. It is the expectation that all LADD employees complete their job in an ethical manner with the best interest of LADD in mind at all times.

Privacy Notice

Access to Records

Business Associates Policy

HIPAA Safeguard and Security Policy

Device and Media Control Policy

HIPAA Breach Response Policy

Information Access Policy

Record Retention and Asset Management

Workstation Access and Facility Security

Social Media Policy

Trademark and Logo Use Policy

Cell Phone and Texting Policy
Corporate Responsibility Policy
Corporate Giving Policy
Gifts, Bequests and Donation Policy
Fund Raising Policy
Billing, Payment and Personal Funds-Benefits Reconciliation Procedure- Office
Conflict of Interest-Code of Ethics Policy
Standards of Conduct
Good Moral Character Policy

SECTION III. Conducting Effective Training and Education

All potential employees receive a copy of the LADD Mission, Vision and Values at the initial interview in an effort to communicate to them the principles that guide the organization and the behavior that is expected if they are to be employed.

During new hire orientation employees are provided with;

- An explanation regarding how to access the Employee Handbook Code of Conduct as well as how to retrieve and review full policies and procedures.
- Receive training regarding on line access to the CEP and how to review/search information.
- Receive training regarding the CEP and related topics such as the Deficit Reduction Act, Whistleblowers, HIPAA and HITECH.

Annually, all employees receive training regarding the CEP and related topics such as the Deficit Reduction Act, Whistleblowers, HIPAA and HITECH.

When people supported and Guardians begin services with LADD they are provided with information about accessing the CEP on the LADD website.

Compliance and Ethics Training Policy

SECTION IV. Developing Effective Lines of Communication

In order to provide the highest level of services and adhere to the LADD Mission, Vision and Values; employees are expected to be honest ethical and act with integrity. Standing in Truth is a core competency for all LADD employees. Being of Good Moral Character is a job essential requirement to remain employed and is written in all job descriptions. Employees are expected to provide high quality care to vulnerable adults and children. In doing so, they must be honest, speak the truth, act and speak with integrity and positive intent. The people we support rely on employees for their physical and emotional well-being. They must act with kindness and compassion, communicate with positive intent, and immediately correct and report any wrong doing. Employees who observe or are aware of violations of LADD policies or procedures must report them to Management and/or the Corporate Compliance Officer immediately. Employees are required to ensure the rights of the people we support and keep them safe at all times.

Complaint Reporting Policy

Open Door Communication Policy

Whistleblower Policy

Duty to Warn Policy

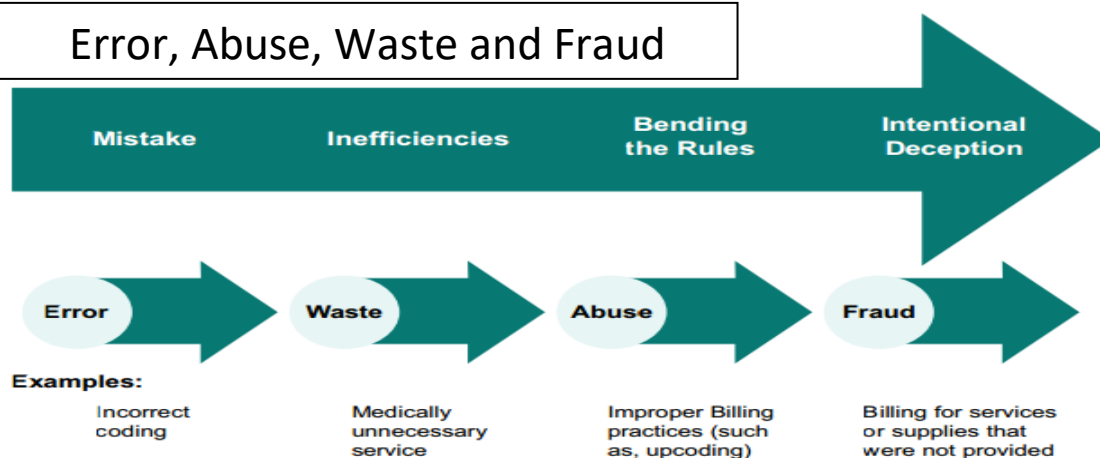
Policy on Responding to Subpoenas, Police and Media

Harassment and Workplace Violence Policy

SECTION V. Conducting Internal Monitoring and Auditing

LADD is a non-profit corporation dedicated to making the difference in people's lives. LADD must act ethically when establishing expectations of behavior, character, and conduct; and maintain the distinction between right and wrong, and eliminating fraud, waste and abuse. LADD is responsible for achieving results through improved quality of life.

Error, Abuse, Waste and Fraud



Auditing and Monitoring Policy

Audit- Responding to Audit Findings from External Monitoring Agencies

Billing, Payment and Personal Funds/Benefits Reconciliation Procedure

SECTION VI. Enforcing Standards Through Well-Publicized Disciplinary Guidelines

Employees receive direction on accessing the Employee Handbook Code of Conduct at the time of hire and training throughout their employment regarding policies/procedures that establish standards for disciplinary action and/or possible separation from employment. Personnel matters are confidential by nature and as such, most often, violators of the CEP will not have publicized disciplinary action. However, violations of the CEP will be addressed through timely and consistent disciplinary action which could include separation from employment.

All CEP violations are immediately corrected, including any additional education and training that is necessary for prevention. Education and training are primarily addressed during semi or annual training or through in person meeting/trainings in all programs.

In most cases, remedial actions are designed to improve the performance of LADD employees. Management will identify the exact nature of and need for remedial action in collaboration with Administration and/or CCO.

SECTION VII. Responding Promptly to Detected Offenses and Undertaking Corrective Action

Failure to comply with the LADD CEP or the laws and/or regulations applicable to federally funded behavioral health care programs, Home help services, or any program of training, counseling or remedial action which an employee has been required to undertake, may result in discipline up to and including separation from employment or association with LADD.

In cases of intentional misconduct, repeated violations, or after documented remediation(s) have failed to correct the problem, LADD may initiate corrective or disciplinary actions. The initiation of corrective or disciplinary action by LADD does not preclude or replace any criminal proceedings that may be taken by the appropriate legal authority.

Investigation Policy

CLOSING

LADD is committed to all elements of the CEP and continuously reviews and revises policies, procedures and practices to remain compliant with all laws, regulations and standards of best practice. LADD is committed to standards for ethical practices concerning staff, Management and all operations of LADD. Inclusive in these is the expectation that support services are provided responsibly, fairly and with awareness of the surrounding community and provide services consistent with LADD Mission, Vision and Values.