



MANDATORY COMPLIANCE PROGRAM

The employee Policy and Procedures Manual along with other directives found in Library and Public Library contain written policies and procedures that describe employee compliance expectations and activities. These include policies and procedures for preventing fraud, waste and abuse. These are embodied in SKIP's code of ethics. A summary of federal and state legislation regarding Mandatory Provider Compliance Programs can be found in Public Library: Federal and New York State Statutes Relating to Filing False Claims.

The Executive Director as head of the agency is vested with the day-to-day responsibility for the operation of the compliance program. This responsibility is carried out with the oversight by the Board of Directors. The Executive Director can, and will in the course of daily business, designate various aspects of SKIP's compliance activities to individual staff members or teams. For example, the Home and Community Based Waiver Services Department staff is required to report any potential compliance issue (involving clients, other providers or colleagues, etc.) to Management. The staff can report as a team or as individuals. The Executive Director reports to the Board of Directors on the activities of the compliance program at least on an annual basis and more frequently when necessary. Any serious untoward circumstance must be reported to the Board immediately.

SKIP of New York maintains an open door policy, meaning that all management staff is available to discuss items, events, etc. with staff. The integrity of the management hierarchy is recognized and preserved in concert with the open door policy.

Employees are encouraged to bring issues of all types to the Human Resources Department where they can be sorted and properly directed. Most simply put, staff is encouraged to report any unusual event or circumstance. The MTA slogan "if you see something, say something" aptly describes SKIP's stance in this matter.

SKIP provides New Employee Orientation to new staff members. This orientation includes a mandated reading of the Policy and Procedures Manual as well as a discussion of the content of Library and Public Library. New Employee Orientation includes a description of SKIP's Mandatory Compliance Program. New hires must sign a statement indicating that they have read the Manual. They are also given ample opportunity to discuss and question the content. The Policy and Procedure Manual is on SKIP's intranet and is continually available to each employee. The Board of Directors and other appropriate persons, who may be associated with the agency, upon request are furnished with the Manual (and updates) and are also provided with necessary training.

Each new employee is assigned to a Supervisor who is responsible for continuing the in-service training. All Family Advisors and Supervisors attend Core Training which is furnished by the NYS Office for People with Developmental Disabilities. This is in addition to 10 to 15 hours of annual mandated or voluntary training for Medicaid Service Coordinators. SKIP also mandates staff attendance at biweekly staff meetings. Program compliance issues and updates are discussed at these meetings. Supervisors also have regular team meetings where pertinent compliance issues are discussed.

When a potential or actual program compliance issue is reported to the Executive Director an immediate investigation of the matter is undertaken by the Director or designee. Additional

appropriate actions are prompted by the course and outcome of the investigation. Each matter must be resolved. Final actions can range from closure, corrective action and/or termination and are described in the Manual. Progress in the investigation of serious matters must be reported at least weekly to the Board of Directors by the Executive Director or designee and final resolution must also be reported. SKIP has a standard form (found in SKIP forms) to record and report untoward events. These records are maintained by the Human Resource Director.

SKIP encourages employees to participate in good faith in all compliance programs. This is encouraged by the promise of confidentiality (when possible) and strict adherence to the principles of Whistleblower Protection Legislation which call for non-intimidation and non-retaliation. Due to the nature of some events, the circumstances must be reported to other parties and the informant cannot always remain anonymous. Employees should be aware of this at the outset. If an employee is involved in a compliance situation, SKIP's disciplinary policies and procedures (as described in the Employee Manual) encourage compliance; failure to report problems is subject to sanction. Training, open vertical and horizontal communication and the open door policy all contribute to an atmosphere that supports participation in compliance programs. Disciplinary action procedures and actions that call for disciplinary action are also outlined in the Manual. The Director of Human Resources with the advice and consent of the Executive Director oversees and, at times, participates, in disciplinary action activities. It is the responsibility of this official to assure that disciplinary procedures and actions are uniformly, fairly and firmly enforced.

SKIP has a number of routine methods to test for program compliance, identify potential risks and implementation of remedial action.

SKIP promptly reports irregularities to appropriate federal/state officials and makes repayment of any overpayment.