



**Career Opportunity Development, Inc.**  
**FY 2023 Compliance Plan**

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# **CODI's Compliance Plan**

## **Introduction:**

CODI is committed to upholding the highest standards of ethical and legal behavior. This plan provides an overview of CODI's compliance standards and practices. These standards and practices are an essential component of how CODI fulfills the organization's mission and conducts business.

## **CODI's Compliance Plan:**

- Reinforces CODI's commitment to ethical business practices
- Addresses compliance requirements of federal and state laws and funding source directives
- Outlines monitoring and auditing functions and proactively addresses potential compliance issues
- Defines compliance enforcement and disciplinary components to ensure that staff members understand the responsibilities of adhering to and maintaining the highest standards of ethical and legal behavior related to compliance standards and practices

## **Administrative Structure**

Compliance efforts are managed and overseen by Director of Quality Improvement (DQI) and CODI's Compliance Team.

- A. DQI - is responsible for directing and monitoring the company's compliance efforts. General responsibilities include:
- Serves as the organization's internal and external point of contact for corporate compliance issues
  - Scrubs claims to reduce the risk of fraud and reports monthly findings to Chief Financial Officer (CFO). See CODI's Scrubbing Claims Policy for additional information.
  - Leads the Compliance Team in developing, implementing, and monitoring compliance activities
  - Maintains minutes of Team meetings summarizing the items addressed and actions taken at each meeting
  - Works with Director of Human Resources (DHR) to ensure staff members receive all compliance-related policies
  - Works with DHR to ensure that licenses and certifications are verified and files are compliant with licensing and funder requirements
  - Conducts an annual HIPAA Security Rule Risk Assessment and reports to Compliance Team
  - Oversees, investigates, and documents alleged compliance issues and grievances
- B. Compliance Team - together with the DQI, develops and monitors the Compliance Plan on an annual basis. The Team consists of representatives across various departments. The Team meets quarterly and:

- Assesses and revises existing compliance policies and procedures to assure continued compliance with the laws, regulations, and funding source requirements
- Reviews the disposition of allegations reported through CODI's electronic reporting hotline. This system allows users to report fraud, non-compliance, and abuse anonymously through a link to *Accreditation Now*, located on CODI's website, [www.njcodi.org](http://www.njcodi.org). The *Accreditation Now* process notifies DQI and President/CEO of submissions
- Reviews the results of investigations
- Reviews compliance training topics to ensure effectiveness
- Maintains the confidentiality of any sensitive or proprietary information learned by a member through the Compliance Team

## **Communications**

CODI communicates its commitment to compliance with all federal, state, local, and funder requirements to employees, volunteers, interns, and the Board of Directors. The organization uses a variety of channels to encourage dialog and the reporting of potential fraud and misconduct including:

- New Hire Orientation
- In Services
- UROC
- Website
- Annual review of compliance policies, which are sent out electronically via Relias

## Policy Clarification

CODI employees may seek clarification from a supervisor, DQI, or President/CEO regarding compliance policy or procedure. Questions or input directed to DQI or President/CEO, shall be shared with Leadership, if appropriate, so that standards, policies, and procedures can be enhanced.

## Communicating Compliance Activities to Board of Directors

If there is a Compliance Allegation, DQI shall submit a report to the Board of Directors, including a summary of allegation and investigation result. DQI shall also include a complete description of corrective actions and recommendations for changes to the organization's policies and procedures.

## Protection of Employees

CODI will make every effort to maintain the confidentiality of individuals who report possible misconduct. There will be no intimidation or retaliation towards anyone reporting a suspected violation in good faith. Potential whistleblowers must avoid baseless allegations, which are allegations made with disregard to truthfulness. Please see CODI's Whistleblower Policy for further information.

## **Responding to Detected Offenses**

DQI reviews allegations of potential wrongdoing reported by Accreditation Now and grievances. Please refer to CODI's Investigation Procedure policy for further information.

If the investigation indicates that a violation occurred, appropriate corrective action will be taken, including the following:

- Prompt restitution of incorrect billing
- Notification to the appropriate government or law enforcement agency, where applicable
- Review of current policies and procedures to determine if clarification, system modification, or staff education is needed
- Possible disciplinary action of involved employees or volunteers, up to and including termination

## **Education and Training**

As part of New Hire Orientation, employees are required to review CODI's UROC, Whistleblower, CIR preparation and template, Code of Ethics,

Prohibition of Abuse, Neglect, or Exploitation, Rights of Individuals Receiving Services, Danielle's Law, Stephen Komminos' Law, and complete online trainings on Abuse and Neglect, Client/Patient Rights, Corporate Compliance, Cultural Competence, Customer Service Essentials, Fire Safety, Harassment in the Workplace, HIPAA The Basics, HIPAA Security, Substance Use in the Workplace, Technology and Cybersecurity, and Workplace Violence within 15 days. Relias trainings are required to be completed annually.

*Accomplishments – July 1, 2021 through June 30, 2022*

1. Leadership Team reviewed Performance Measurement and Management Plan and revised goals to align with program and agency needs.

2. Minimal progress has been made with increasing CSS units of service to pre-COVID requirements. 65% of billable time would be equivalent to 380 units. The average units from July 2021 to February 2022 is 268.
3. No progress was made with reviewing and revising job descriptions to include hybrid employment model. Goal will remain for upcoming fiscal year.
4. Department Heads updated staff performance evaluations to align with essential functions in job descriptions and forwarded to DQI for review.
5. Department Heads updated job descriptions to move from generic to essential functions and forwarded to DQI for review.
6. MIS researched the benefits of a fireproof rack system along with other fire suppression alternatives.
7. DQI reviewed departmental policies with each Department Head with the exception of Supported Employment.

*Goals – July 1, 2022 through June 30, 2023*

1. Increase CSS units of service to pre-COVID requirements equaling 65% of billable time.
2. Review and revise job descriptions to include hybrid employment model.
3. To reduce amount of errors in audits, VP of OES shall review ATS notes to ensure documentation is accurate prior to billing.
4. Increase EE attendance to 90% or above.