

**CODI Risk Management Plan
FY 2024 (July 2023 – June 2024)**

Risk management is a dynamic process of identifying risk and selecting techniques to address that risk. CODI’s Risk Management Plan describes recommended actions and documents steps to establish or maintain expectations.

CODI’s Leadership Team met and reviewed potential risks. These risks were analyzed, evaluated, and assigned a rating. Low scores (1 or 2) represent either an unlikely risk or that adequate plans are in place to mitigate the risk. Higher ratings (4 or 5) indicate a potential risk, or no plan is in place to address the risk, even if the risk is unlikely. Items rated 4 or 5 are considered priority areas and need action.

Consumer Relations	Analysis	Evaluation	Action Needed	Responsible	Timeframe	Completed or Action Needed
Lack of information from funding source is delaying reimbursement to ATS consumers for transportation and hindering stakeholder satisfaction	CODI discontinued transportation post-pandemic, and ATS contract includes transportation	4	Adjust staff schedules to transport consumers when no other options are available Continue to request contract amount for ATS transportation from DDD Reimburse ATS consumers for transportation	VP of OES CFO/ VP of OES CFO	FY 2024	
Communications	Analysis	Evaluation	Action Needed	Responsible	Timeframe	Completed or Action Needed
Enhance communication and information accessibility	OSC consumers may benefit from receiving safety tips and closure notifications to mobile device	3	Maintain database of email addresses and cell phone numbers Share safety tips and closure notifications through database	DRM	Ongoing	
Community has limited awareness of programs and organizational activities	Community needs to gain a better understanding of scope of services CODI provides and positive outcomes	3	Expand CODI website to market programs and services and educate community	President/ CEO/ DCO	Ongoing	

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Finance	Analysis	Evaluation	Action Needed	Responsible	Timeframe	Completed or Action Needed
Minimize loss of funds due to possible reduction of EE slots	EE attendance is essential to preserve existing EE slots	5	Monitor attendance closely and continue to perform outreach for past participants	VP of OES	Ongoing	
Lack of ability to balance budget with last fiscal years' overtime	Without additional pandemic funding it is imperative to reduce overtime	5	Adjust staff schedules to reduce overtime. Change PPC and notify staff back-to-back shifts will no longer automatically be paid overtime	Pres/CEO	July 2023	
Possibility of decrease in revenue	Competition is moving into Vineland to compete for CODI's janitorial contracts	5	Enhance website marketing initiatives Thank vendors through cards and small tokens of appreciation	COO/ DCO COO / VP of OES	Ongoing Ongoing	
Lack of adequate cash reserve to fund capital improvements, including vehicle purchases	Before "Fee for Service," funding sources paid for capital improvements. Due to "Fee for Service," CODI is now responsible for funding all capital improvements.	5	Include \$40,000 per month (\$480,000) in FY 2024 budget to fund capital improvement reserve fund	President/ CEO & CFO	July 2023	
Lack of ability to balance budget with increase in staff health insurance premiums	A massive increase in staff insurance premiums this fiscal year removed CODI's ability to absorb the increase	4	Meet with numerous brokers to formulate staff insurance options to maximize benefits and minimize staff contributions	President/ CEO & CFO	July 2023	

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Lack of adequate cash reserve to fund mortgage payment	Eliminating mortgage liens will place CODI in an enhanced financial position. State was notified in FY 2023 of intent to pay off balance, paperwork is with state's legal team.	4	Follow-up with State of New Jersey regarding paying off balance for 711 \$112,430	President/ CEO & CFO	Ongoing	
Lack of adequate cash reserve to fund mortgage payment	Eliminating mortgage liens will place CODI in an enhanced financial position	4	Pay off balance to State of New Jersey for 233 \$151,635.50 within FY 2024	President/ CEO & CFO	FY 2024	
Lack of credentialed replacement staff in Residential	Credentials are required to bill for services. Cash flow and billing would be severely disrupted if VP of Residential leaves.	4	Ensure qualified existing staff become credentialed	VP of Residential	FY 2024	
Lack of revenue to support operating coffee shops	Coffee shops have not been profitable in a number of years. Unsure of long-term ramifications of shuttering coffee shops including community integrated employment, branding, marketing, and public relations.	4	Place suggestion boxes in both coffeeshops for menu item suggestions to boost sales Continue to monitor costs and reevaluate in six months	COO Pres/CEO/ CFO/	July 2023 Dec 2023	
Possibility of cybercrime exists	Cybercrime is on the rise and would be costly Cyber insurance rider requires Multi-Factor Authentication (MFA) to renew insurance	3	Set up Multi-Factor Authentication (MFA) to access the Server	MIS	Sept 2023	

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Human Resources	Analysis	Evaluation	Action Needed	Responsible	Timeframe	Completed or Action Needed
Possibility of newly hired staff turnover	Gap between new hire orientation (NHO) and being scheduled to work in group home causes some to seek alternate work options	4	Expedite scheduling process by assigning residential new hires during NHO	VP of Residential	FY 2024	
Information Technology	Analysis	Evaluation	Action Needed	Responsible	Timeframe	Completed or Action Needed
Enhance protection against cyber attacks	Close gap between response and remediation of penetration attempt	4	Obtain Managed Detection and Response (MDR) to protect server from cyber attack	MIS	July 2023	Completed
Risk of fire from server heat buildup	Administrative office was converted into LAN Room, and server should not be on carpeting	3	Remove carpeting in LAN room	COO	FY 2024	
Property/Health & Safety	Analysis	Evaluation	Action Needed	Responsible	Timeframe	Completed or Action Needed
Lack of written controls for insuring against waste and theft	Written policies not established to ensure staff awareness of expectations when ordering and receiving food and supplies	4	Write policy for ordering, receiving, and confirming receipt to safeguard against possible waste or theft for: Food Service Janitorial Group Homes Include policy in Financial SOPs	 COO COO CFO CFO	FY 2024	

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Lack of security at group homes from doors being left unlocked	Consumers unlock coded entrance doors and leave open for ease of access	4	Install keypads or devices that will not permit doors to be left unlocked	COO	Ongoing	
Lack of automatic emergency response notification in non-hardwired group homes could lead to increased physical and property damage	24/7 monitoring is needed in non-hardwired group homes to ensure safety of consumers and staff	4	Convert remaining A+ group homes to 24/7 monitoring by security service who automatically notifies fire and police if fire alarm is triggered Train staff to notify central station monitoring service pre-fire drill	COO	Ongoing	
Risk of mildew buildup from trapped water	Vanities are not conducive to the population served as splashed water rots particle board and metal	4	Install pedestal sinks instead of vanities	COO	FY 2024	
Possibility of infectious outbreak	Consumers and staff are susceptible to COVID-19 with underlying health issues	4	COVID protocol shall remain in place until threat resolves including: masks in vehicles if 1> person, testing if symptomatic or close exposure, requesting vaccination cards upon hire, quarantine, disinfecting, and handwashing	DRM	FY 2024	
Lack of lighting around perimeter of group homes	Staff are unable to see outside if needed	3	Complete lighting upgrades at 1309 and 233	COO	FY 2024	

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Possibility of fall risk	Consumers risk fall ambulating into tub Need for additional accessibility items needs to be reevaluated	3	Remove bathtubs and replace them with walk-in showers with safety grab bars to decrease fall risk Assess need for additional ramps and safety grab bars at residences to reduce fall risk	COO COO/ VP of Residential	Ongoing FY 2024	
Lack of handicapped-friendly residences for aging CSS consumers	Ensure ADA-compliant residence	3	Subdivide 319 Prepare land to drop-ready specifications for three houses. Set concrete pad foundations and run water, gas, electric, and sewage.	COO	Ongoing	
Lack of consumer input in inspection process	Opportunity to involve consumers in inspection process may be mutually beneficial	3	Involve EE consumers in quarterly EE inspection twice yearly Involve Residential consumers in quarterly Residential property inspections twice yearly	DRM VP of Residential	Ongoing FY 2024	
Possibility of fall risk when entering loading dock	Possible fall risk without second grab bar on loading dock ramp	3	Install second grab bar on freezer side	COO	FY 2024	
Lack of power causes operational failure	Power failures are frequent in parts of Atlantic County and can cause need for evacuation and food spoilage	3	Purchase and install one whole house generator annually (233)	CFO/ COO	FY 2024	

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Lack of vehicle oversight	Process is not in place to actively monitor vehicle safety	3	Schedule for routine maintenance and complete vehicle checklist and safety inspection quarterly	Department Heads	FY 2024	
Compliance	Analysis	Evaluation	Action Needed	Responsible	Timeframe	Completed or Action Needed
Funding no longer assures payment of staff wages. Therefore, CSS staff must provide 65% face-to-face time to ensure payroll coverage.	CODI anticipates “Fee for Service” face-to-face requirement resuming FY 2024	5	Increase CSS units of service to pre-COVID requirement equaling 65% of billable time	VP of Residential/ Dir of Residential CSS	Ongoing	
Possibility of fraudulent billings due to inaccurate documentation	CSS audit process does not include reviewing progress notes for accuracy	4	Review progress notes monthly for consumer billings of ten units or more	DQI	Ongoing	
Possibility of fraudulent billings due to non-verification of consumer’s absence from group home	Residential audit process does not include reviewing service documentation reports and communication logs	4	Review service documentation reports and communication logs to ensure consumers were absent	DQI	Ongoing	
Community Employment Services supervisors and leads could unintentionally mistreat a consumer	Community Employment Services supervisors and leads work with some crew members with DDD services and have not received CDS Maltreatment Training	4	Schedule and ensure Community Employment Services supervisors and leads complete CDS Maltreatment Training during NHO and annually going forward	DHR	Ongoing	

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Reputation	Analysis	Evaluation	Action Needed	Responsible	Timeframe	Completed or Action Needed
Lack of ability to remove negative reviews online could damage public trust and CODI's reputation	While CODI has numerous SOPs to address Social Networking and posting negative feedback, disgruntled or terminated staff can significantly affect CODI's reputation	4	Conduct online searches of CODI and respond to negative feedback if warranted, as directed by President/CEO	DCO	Ongoing	
Environmental Factors	Analysis	Evaluation	Action Needed	Responsible	Timeframe	Completed or Action Needed
Funding no longer assures payment of staff wages. As a result, ATS staff must provide timely and accurate documentation to ensure payroll coverage	With continued implementation of the Fee-for-Service model, training CODI staff to successfully document service provision in an accurate and timely manner is critical	5	Train direct care staff to adapt to Medicaid documentation and billing requirements Continue ATS compliance monitoring	VP of OES/ ATS Mgr DQI	Ongoing Ongoing	
ATS stipend ended	Current LOS is inadequate to sustain program	5	Continue monitoring costs to ensure program sustainability	CFO	Ongoing	
OES program requires CARF accreditation	Without CARF accreditation OES is not able to be funded through DVRS	5	Complete preparation for CARF 2023 survey	Leadership Team	Ongoing	
Lack of EE contract	Current LOS is inadequate to sustain program if contract requires 90% average daily attendance	5	Continue to serve on ACCSES New Jersey's Extended Employment Task Force to advocate for no decrease of program slots in contract	President/ CEO	Ongoing	

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Lack of stable food costs	Food costs continue to increase since 2021	5	Reiterate to staff to purchase from bulk stores to reduce food and non-food costs	VP of Residential	FY 2024	
Pending federal legislation if passed will prohibit 14-C certification	By abolishing the 14-C consumers would be required to earn minimum wage versus piece rate	5	Participate in 14-C National Coalition to advocate for program options	President/ CEO	Ongoing	
Federal legislation change may prohibit paying sub-minimum wage	Federal legislation language currently reads no pay under minimum wage	5	Aggressively seek external employment opportunities for EE consumers Expand consumer employment options to include additional community-integrated employment, hybrid-model, set-aside contracts, and work crews paying minimum wage or higher	Job coaches COO/ VP of OES/ Job coaches	Ongoing Ongoing	
Decrease in CSS referrals due to increasing competition	Numerous vendors have started to offer CSS services in Atlantic County	4	Actively participate in System Review Committee Expand Residential Program description on website	VP of Residential VP of Residential/ DCO	FY 2024 FY 2024	