Catholic Charities
Corporate Compliance Plan

Revised 8/18/2026

CATHOLIC CHARITIES
OF THE DIOCESE OF ALBANY

CATHOLIC CHARITIES
OF THE DIOCESE OF ALBANY

SISTER BETSY VAN DEUSEN, CSJ
CHIEF EXECUTIVE OFFICER

TO: Members of Catholic Charities of the Diocese of Albany

FROM: Robert Bellafiore and Sister Betsy Van Deusen, CSJ

RE: Revised Corporate Compliance Plan

The Board of Trustees (BOT) of Catholic Charities of the Diocese of Albany (CCDA) and Sister Betsy Van Deusen, CSJ, Chief Executive Officer (CEO), are dedicated and committed to meeting high ethical standards and compliance with all applicable laws in all programs and services provided by our agencies. Compliance and ethical practices are fundamental to the CCDA mission with regard to how we provide services to the many people we serve. Therefore, it is our pleasure to distribute the revised system-wide Corporate Compliance Plan.

The Corporate Compliance Plan is an important document that identifies the elements of our Corporate Compliance Program and the expectations placed upon each of us as members of the BOT, Agency Board of Directors, employees and members of CCDA.

Upon the receipt and review of the Corporate Compliance Plan, kindly sign the acknowledgement in the back and return it to your supervisor or Agency Executive Director. If after reading through the plan you have questions, you may address them to your supervisor, Agency Executive Director or to Derek Blauser, Compliance & HIPAA Privacy Officer. Derek can be reached at 518-362-8560 or at derek.blauser@ccrcda.org.

Robert J. Bellafiore
President, Board of Trustees

Sister Betsy Van Deusen, CSJ
Chief Executive Officer

Corporate Compliance Plan

Approved by the Board of Trustees (BOT)
of Catholic Charities of the Diocese of Albany (CCDA)

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Compliance related requests or reports of concerns can be made to:

Compliance & HIPAA Privacy Officer:
Marissa Agosto
Phone: 518-362-8560
Email: Marissa.agosto@ccrcda.org

Ethics Help Line:
Phone: 1-866-662-1875
Email: Compliance@ccrcda.org

Chief Executive Officer (CEO):
Sister Betsy Van Deusen, CSJ
Phone: 518-453-6650

Our Mission

The mission of Catholic Charities is the foundation of the Corporate Compliance Plan.

Our Mission Statement

Catholic Charities, a ministry of the Diocese of Albany, is committed to active witness on behalf of the Scriptural values of mercy and justice.

Catholic Charities recognizes human need at all stages of life, responds to all persons regardless of race, creed or lifestyle, with special emphasis on the economically poor and vulnerable.

Catholic Charities serves and empowers persons in need, advocates for a just society, calls forth and collaborates with women and men of good will in fulfillment of its mission.

Principles and Values

The Church's social teaching is a rich treasure of wisdom about building a just society and living lives of holiness amidst the challenges of modern society. CCDA's principles and values, outlined below, are rooted in these teachings.

Principles

Human Dignity: CCDA affirms that each person is made in the image of God and has inherent dignity. Each person must be respected from conception to natural death. Each person is endowed with rights and duties. CCDA affirms that each person served and engaged with our work will be held in great esteem and with great respect.

Common Good: CCDA affirms that there is a universal destination of all created things that all persons have the right to access all that they need in order to reach their fulfillment and that all persons have the concurrent obligation to work for the rights of others as well.

Subsidiarity: CCDA affirms that decisions should be made at the lowest possible level, should involve those who are capable of participation in decision-making and who will be impacted by those decisions and should empower those who are most in need. Concurrently, we commit to creating and renewing structures and institutions that provide assistance and aid, as required, appropriate and necessary. CCDA, as members of the civic society, affirms that we should actively participate in the public discourse at both the national and local community level, seeking justice for all but especially for those who have no voice of their own. We affirm that we should both

advocate and serve, advocating both for individuals and for just social structures.

Solidarity with the Poor: CCDA affirms that the most poor and vulnerable persons and families have a special claim to our services and programs. CCDA affirms that our staff and Boards should engage those served to have representative voice in decisions impacting policies and programs. Accordingly, we affirm the need to create structures and processes for obtaining appropriate input from stakeholders. CCDA commits to continue to be a voice with poor and vulnerable individuals and families in the public discourse.

Fundamental Values

Truth: CCDA affirms that transparency and accountability will always be pursued in our communication and work. CCDA affirms the truth of the intrinsic dignity and worth of the human person as a social being and will witness to our Catholic identity in fulfilling our roles in Church and in society.

Freedom: CCDA affirms that we will always assist our clients, staff and volunteers to live in socially responsible freedom, to exercise their authentic autonomy in light of objective truth and to actualize their inherent potential as beings created in the image and likeness of God. CCDA will respect and affirm the autonomy of each organization/entity with whom we are in relationship.

Justice: CCDA affirms that it is a matter of justice that all clients have the right to self-actualization and to reach their potential as beings created in the image and likeness of God. CCDA affirms that we will work to achieve greater justice in our communities through our social policy advocacy efforts – locally, nationally and internationally. CCDA affirms that all contracts and agreements and all relationships with stakeholders will be based on norms of justice. CCDA affirms that we will work to expand and maintain excellence in our membership, board, leadership positions and staff. CCDA affirms that we will continue to work to help eradicate racism and prejudice within our own organizations and in society at large.

Love: CCDA affirms that love – caritas – will be the chief identifying characteristic and element of our work and life.

Our Commitment to Embracing and Respecting People's Differences

Catholic Charities recognizes individual differences, and accepts and respects these differences among clients, staff, volunteers, and members of the communities it serves. Catholic Charities works to embrace and respect people's differences in its board membership, leadership positions, and across all staff positions.

Catholic Charities welcomes all people and works to engender respect within the Catholic Charities organization and the communities it serves. Catholic Charities is committed to equity and the distribution of resources and opportunities across the organization and the communities it serves in a manner that results in equitable access to opportunities regardless of social, physical, or structural inequalities.

Catholic Charities recognizes that embracing and respecting people's differences can only be accomplished through an ongoing, intentional and dedicated effort at all levels of the organization, and remains committed to this effort, as it seeks to contribute to building inclusive and equitable communities across the Diocese.

Introduction

The BOT and the CEO are dedicated and committed to meeting high ethical standards and compliance with all applicable laws in all programs and services provided by our agencies. The Corporate Compliance Plan has been established to assure that CCDA's programs and services are being conducted in compliance with applicable

laws, regulations, contracts and the highest ethical standards. This Corporate Compliance Plan contains the elements required by NYS Medicaid Compliance regulation, 18NYCRR Part 521, and is intended to create an organizational culture that is transparent and promotes prevention, detection and resolution of instances of conduct that may not conform to: 1) our mission and values; 2) standards of ethical conduct; 3) federal, state and local laws; and 4) federal, state and private health care funded program requirements, such as Medicaid and Medicare. As detailed with this Plan, it is the duty of CCDA members to comply with the codes of ethical conduct and compliance standards applicable to their individual areas of employment and assignment.

Throughout this plan, all stakeholders will be referred to as "Members" and the contents should be considered by each member as it pertains to their role in the system of CCDA. Members of CCDA include employees, Agency Board of Directors, BOT, contractors, subcontractors, agents, independent contractors, and corporate officers of CCDA.

If, at any time, a member becomes aware of any apparent violation of this plan, which includes CCDA's standards, they have a responsibility to report such violations in accordance with the reporting requirements of this plan. Persons making such reports are assured that these reports will be treated as confidential to the extent permissible. CCDA will take no adverse action against persons making such reports in good faith and without malicious intent, whether or not the report ultimately proves to be founded. If a member does not report conduct violating the CCDA's standards, that member may be subject to disciplinary action. When a member has a question regarding the legality or propriety of a course of action, the member should seek guidance from their supervisor or from the Compliance & HIPAA Privacy Officer before taking any action.

CCDA'S COMMITMENT TO ETHICAL BEHAVIOR AND COMPLIANCE

All members with a direct interest, involvement or partnership with CCDA, are expected to have a commitment to ethical behaviors within this system of services. For this purpose we are providing you this Compliance Plan. This plan, in conjunction with the Code of Conduct was designed to offer all employees, members of the BOT, members of the Agency Board of Directors, and other affected individuals general direction when confronted with an ethical question. As needed, this plan may make reference to other resources that more specifically outline expectations.

Member responsibilities include engaging in ethical behaviors, refusing to engage in unethical or illegal actions, and reporting compliance concerns and violations.

Ethical behavior is defined as decisions, choices, and actions of an individual or group within the organization that reflect the CCDA mission, the principles of Catholic Social Teaching, the Ethical and Religious Directives for Catholic Health Care Services issued by the United States Conference of Catholic Bishops, and that are in compliance with internal and external standards and regulations.

Benefits of a Compliance Program

An effective Corporate Compliance Program helps to ensure the integrity of programs and services as well as minimize risks to programs and services, and most importantly, to clients served. Benefits of an effective Corporate Compliance Program include but are not limited to the ability:

- To provide a framework for educating staff regarding the link between our mission and values and regulatory compliance
- To provide programs and services in compliance with state and federal laws and consistent with the highest standards of business and professional ethics

- To identify systems that are working well with the possibility of replicating those systems in other agencies throughout our system as well as find and correct organizational weakness
- To implement and document changes as proof of effectiveness
- To communicate with members regarding CCDA's commitment to quality services, and a willingness to hear member concerns
- To promote ethical conduct
- To promote a willingness to work collaboratively with auditors

The Eight Elements of the Corporate Compliance Program

This Corporate Compliance Plan has eight elements, designed to meet the requirements of various compliance related laws and regulations including:

- NYS Medicaid Provider Compliance Programs: 18NYCRR SubPart 521-1 and SubPart 521-3
- Federal False Claims Act: 31USC Sections 3729-3733
- NYS False Claims Act: NYS Finance Law, Article 13, 187-194
- Deficit Reduction Act of 2005: 42USC 1396a(a)(68)

The Eight Elements:

I. Corporate Compliance Written Standards and Procedures

II. Corporate Compliance Program Oversight and Oversight Authority

III. Training and Education

IV. Reporting Concerns & Communication with Compliance- Ethics Help Line

V. Annual Work Plan, Auditing and Monitoring

VI. Responding to Non-Compliance and Developing a Corrective Action Plan

VII. Whistleblower Provisions and Protection

VIII. Enforcement of Compliance Standards

I. Corporate Compliance Written Standards and Procedures

There are numerous federal and state laws and regulations defined for programs operating within CCDA. Where relevant, CCDA has developed standards and procedures to operationalize funding and program requirements. CCDA will continue to revise and/or develop standards and procedures as regulatory requirements change. These standards and procedures promote our commitment to delivering the highest quality services that is expected from CCDA.

CCDA Compliance Policy and Procedures include this Compliance Plan, the Code of Conduct, and other standards and procedures specifically referenced in this Compliance Plan. In addition, CCDA Agencies have their own or program-specific Standards and Policies to address programmatic compliance requirements. These Compliance Policies and Procedures will be reviewed annually to determine if they remain accurate, effective, or in need of revision. The Compliance Officer (CO), Compliance Coordinator, Compliance Committees, and the CCDA Standard and Procedure Approval Process have a role in review and approval of Compliance Policy and Procedures.

Federal and state statutes (e.g. Title 18, Part 521) illustrate actions that pose a particular risk to human service organizations. Risk areas include but are not limited to:

- Billing and payment: receiving reimbursement for items, supports or services not actually rendered; duplicate billing and receiving more reimbursement than is due; and false cost reports

- Quality of Care: billing for services that don't meet quality of care standards
- Ordered services and medical necessity: providing and keeping reimbursement for unnecessary or unauthorized supports or services
- Billing for supports or services with inadequate supporting documentation
- Disclosing protected healthcare information
- Solicitation or receipt of remuneration for referrals
- Credentialing: license expiration, insufficient education or missing continuing education requirements

CCDA's Compliance Program applies to the following risk areas: billing, reimbursements, ordered services, medical necessity, quality of care, governance, mandatory reporting, credentialing, contractor oversight, and other organizational risks. CCDA is committed to monitoring these risk areas, and ensuring that billing practices, documentation, and service delivery comply with federal and state laws and regulations as well as contractual agreements.

II. Corporate Compliance Program Oversight and Oversight Authority

The Corporate Compliance Program Oversight consists of the BOT Corporate Compliance Committee, Management Compliance Committee, Agency-specific Medicaid Compliance Committees, the Compliance Officer (CO) and the Compliance Coordinator.

Board of Trustees: The BOT authorized the development and implementation of an effective Corporate Compliance Program at CCDA, and has designated a subcommittee to function as the Corporate Compliance Committee of the BOT. The BOT Corporate Compliance Committee is responsible for approving and overseeing the Corporate Compliance Plan, the Code of Conduct and the Annual Work Plan, along with ensuring that CCDA has an effective Corporate Compliance Program. The BOT Corporate Compliance Committee has a direct line of communication with the CO and will be kept informed of compliance-related issues through a quarterly report and as needed from the CO or CEO.

Management Compliance Committee: The Management Compliance Committee is comprised of Compliance Department staff, Human Resources Director, IT Director/Security Officer, Chief Program Officer, Chief Financial Officer (CFO), Controller, Director of Quality and Performance Improvement. This committee serves as an informational and advisory resource for Compliance, to facilitate collaboration and communication about compliance audits, risks, and work plan topics. The Committee Charter outlines this committee's membership and responsibilities.

Medicaid Compliance Committees: CCDA Agencies that are required providers, as defined by 18NYCRR Part 521-1.1 have a Medicaid Compliance Committee, to oversee the compliance efforts specific to their Medicaid programs. The Committee Charter outlines committee membership and responsibilities. Committee activities will be reported at least quarterly to the CCDA Management Compliance Committee and periodically to the Agency Board of Directors. The committee will also be responsible for developing and maintaining an annual workplan to address, at a minimum, the strategies and tasks necessary to meet 18NYCRR 521-1.4. This workplan will detail a prioritized list of compliance actions needed including compliance reporting/response to issues, training plans for affected individuals, policy/procedure oversight, auditing and monitoring, identifying governing laws and regulations, and risk areas. This plan will be developed annually and periodically reviewed/updated by the Agency Compliance Committee.

CO: The CO reports to the CEO and to the BOT Corporate Compliance Committee. The CO is responsible for the compliance program and reports activities of the compliance committees to the BOT Corporate Compliance Committee. The CO is responsible for oversight of the following

Compliance Department responsibilities which include, but are not limited to the following:

- Development and implementation of an annual Corporate Compliance Work Plan in cooperation with the CEO, and CFO to be approved by the BOT Corporate Compliance Committee
- In cooperation with the CEO and Executive Directors create a culture that encourages reporting of suspected fraud or other improprieties without fear of retaliation
- Implementing Corporate Compliance related standards and procedures as deemed necessary in conjunction with the CEO, CFO, and the Director for Human Resources
- Reporting on a regular basis to the CEO, and the BOT Corporate Compliance Committee regarding Corporate Compliance issues and risk areas
- Maintaining a reporting system (Ethics Help Line) and responds to concerns, complaints and questions regarding Corporate Compliance
- Overseeing compliance related investigations
- Overseeing systems that ensure sanction screening processes are completed in accordance with system-wide standards and procedures
- Developing, coordinating and participating in multifaceted educational and training programs that focus on the elements of compliance and seeks to ensure that appropriate employees, contractors, management, and other affected individuals are knowledgeable and comply with pertinent federal and state standards
- Maintaining and updating a written Code of Conduct to provide compliance guidance for employees and members
- Developing recommendations for corrective actions; and when necessary, support Agencies in implementing corrective actions
- Synthesizing and communicating ongoing regulatory changes from state and federal regulators, including OMIG
- Overseeing systems that monitor critical incidents and program audit findings throughout CCDA agencies
- In conjunction with Agency Executive Directors, oversees program-specific internal auditing and monitoring processes, including review of compliance related trends, identification of compliance risk areas, and recommendations related to internal systems and controls to ensure compliance
- Ensuring that the Compliance Program for CCDA Medicaid Required Providers meets regulatory requirements, including those outlined in 18NYCRR part 521

Derek Blauser is the CO, and can be reached at 518-362-8560 or by email at derek.blauser@ccrcda.org or compliance@ccrcda.org.

III. Training and Education:

Staff, members of the BOT, Agency Board of Directors, and other affected individuals are required to participate in training regarding: compliance; preventing and detecting fraud, waste, and abuse of resources; whistleblower protections; ethical standards; HIPAA; confidentiality and conflicts of interest. Staff and affected individuals shall complete an initial training session within 30 days of the date they begin their role with CCDA. Initial training for BOT and Agency Boards shall be done as part of their orientation process. Staff, BOT, Agency Board members and affected individuals shall also participate in Corporate Compliance Training on an annual basis. Additional trainings are required for certain staff and other affected individuals, related to specific roles, responsibilities, contracts or partnerships. The CO, or designee, in conjunction with Agency Executive Directors, will ensure these trainings are implemented as appropriate. As new developments or concerns arise, the CO or designee, may require additional training sessions for some or all individuals. This specialized training may focus on areas that have been determined as posing a high risk of misconduct or error.

Compliance training shall be documented. Employee training records and signed acknowledgements are maintained in personnel files. Training records and acknowledgement forms are maintained within contract files, Agency Board and Trustee member files. Staff and Board members shall sign an acknowledgement form upon receiving the Corporate Compliance Plan and Code of Conduct at initial training and when significant revisions of those documents are received.

Written annual training plans are used by CCDA Medicaid Required Providers, to document compliance related training requirements for those providers.

As part of ongoing training and education, the CO or designee, and Compliance Committees will periodically update the training plans, assess the effectiveness of the Corporate Compliance training materials and make adjustments when needed.

IV. Reporting Concerns and Communication with Compliance – Ethics Help Line

CCDA strives for an environment where service recipients, community members and all CCDA members can openly communicate questions or concerns to a supervisor or the Agency Executive Director. If these options are not available for any reason, the toll-free Ethics Help Line is also available to voice concerns about potential unethical, illegal and unsafe actions and compliance violations. CCDA encourages those reporting a concern to provide contact information, which allows CCDA to follow up with the reporter for additional information. However, CCDA recognizes that there may be situations where reporting anonymously is preferred. Anonymous reports of concern may be made to the Ethics Helpline by phone.

All CCDA employees and members have the responsibility to report compliance violations, and concerns. The CO or designee, follows up on reports to the Ethics Help Line. Individuals may also communicate concerns to the CO in writing, through e-mail or by asking to meet in person. It is not the responsibility of the reporter to determine if the reported concern constitutes an occurrence of potentially unethical, illegal and/or unsafe behavior. CCDA will take no adverse action against persons making such reports in good faith.

Reports and the identity of the reporting party will be treated confidentially to the extent possible. All employees and members who are aware of a concern regarding potential unethical, illegal and/or unsafe action have a responsibility to report the concern. Failure to report compliance concerns may result in disciplinary action or sanctions as outlined in the Employee Handbook, contracts, and bylaws.

Ethics Help Line Phone: 866-662-1875

Or Email: Compliance@ccrcda.org

The phone line allows for anonymous reporting. Please refer to your phone provider's guidance if you want your phone number hidden/not displayed in your phone message.

V. Annual Work Plan, Auditing and Monitoring

Annual Work Plan: The Corporate Compliance Program is committed to an ongoing assessment of program compliance across all agencies. The results of the assessments are the basis for the development of the Annual Corporate Compliance Work Plan. The plan addresses the work activities, and the topics required in 18NYCRR Part 521 for Medicaid required provider agencies, and other Corporate Compliance projects for the upcoming year. These projects might include, but are not limited to the following:

- Internal audit plans
- Re-reviews of areas with previous compliance concerns
- Training plans

The CO develops the work plan with input from CCDA leadership, Agency Executive Directors, and compliance committees. The CO and compliance committees monitor the progress of the plan. The BOT Corporate Compliance Committee is responsible for approving the system wide Annual Work Plan and will receive periodic progress updates.

Audits: CCDA will perform internal audits in order to identify and promptly rectify potential non-compliance and quality issues. The Corporate Compliance Annual Work Plan and Audit Schedule outline compliance audits for the system of CCDA. These audits will be completed by Compliance Department staff, in cooperation with agency staff. In addition, it is recommended that each agency perform their own audits regarding compliance and that the results be shared with the Compliance Department. CCDA audits include periodic audits of records to ensure that billing, claims processing, reimbursement procedure and practices, documentation related to service delivery, credentials, training, and other risk areas adhere to federal and state regulations, contractual agreements, and to CCDA's Standards and Procedures.

In addition to internal audits, an annual financial statement and A-133 Federal Single Audit is performed by an external audit firm.

These records serve as the measurement for fulfilling our obligations to the people we support, our staff, and governing agencies. They are the basis for managing the organization and ensuring that the organization is operating within the mandates of the governing bodies that oversee agency operations.

VI. Responding to Non-Compliance and Developing a Corrective Action Plan

When a concern is brought to the CO, or designee, prompt action will be taken to research the concern, and if necessary, conduct or oversee an investigation/audit to determine the facts of the situation, and any misconduct or violations that occurred. All members have a responsibility to participate, when requested, in the resolution of compliance related matters.

CCDA Members will provide the CO, or designee, with access to all records, documentation, information, facilities, and affected individuals as needed for purposes of carrying out compliance responsibilities.

As needed, the CO or designee will confer with the Agency Executive Director, CEO, CFO, legal counsel, Human Resources, and comply with relevant reporting requirements. If the investigation finds that non-compliant conduct occurred, the corrective action and, if necessary, disciplinary steps will be outlined, as steps to reduce the potential for recurrence, and ensure ongoing compliance with state and federal regulations and internal policies. After the investigation, the investigator will promptly prepare a written report of findings including the corrective action plan which will be shared with the CEO, and when appropriate, the Agency Executive Director. Summary of findings and corrective actions will be shared with the Corporate Compliance Committee of the BOT, and Management Compliance Committee.

In the event an internal or external audit or investigation discovers a departure from legal, regulatory, or ethical standards or shows quality concerns, the report will recommend appropriate corrective action, including revision of internal control mechanisms and procedures. It is the responsibility of agency management to ensure that the appropriate corrective action plan is implemented and resolves the issues identified and that the results be shared with the Compliance Department in a timely manner. The Compliance department will follow-up as needed with regard to the implementation of the corrective action. This may include conducting follow-up reviews.

In any situation where the investigation results show reasonable grounds of a violation of law or contract requirements, CCDA will promptly report the existence of misconduct or non-compliance to government authorities and/or contracted parties in accordance with any

applicable requirements. The Standard and Procedure regarding Self-Disclosure further addresses required actions in the event that an investigation determines that self-disclosure is required, including NYS Medicaid Self-Disclosure Requirements 18NYCRR Part 521-3.

VII. Whistleblower Provisions and Protections

CCDA encourages and requires all members participate in the Compliance Program by refusing to participate in unethical or illegal actions, and by reporting concerns and compliance violations. CCDA and its members will take no adverse actions regarding reports of concern that are made in a good faith effort. In accordance with CCDA's Whistleblower Protections Policy, CCDA prohibits retaliation including threats, intimidation, or loss of employment, against anyone for good faith reporting or participating in the resolution of compliance matters. This includes reporting concerns, participation in any compliance investigation or audit, corrective actions, as well as reporting to appropriate government offices. Any member who believes this standard to be violated is expected to report their concerns to the CO, the Ethics Helpline, or to the President of the Board of Trustees, and a full investigation will occur. If reasonable grounds exist to support the claim, a corrective action plan will be developed which may include disciplinary action against any persons involved in any retaliatory action.

VIII. Enforcement of Compliance Standards

Failure to comply with the Corporate Compliance Plan, the Code of Conduct, applicable Federal and State laws and regulations, contracts and ethical standards governing CCDA's programs, and/or CCDA's standards and procedures may result in disciplinary action or other appropriate corrective actions. Enforcement and discipline, under the authority of appropriate management staff and the system-wide Human Resource Department, will occur as warranted, with escalating actions taken in response to non-compliance, with intentional or reckless behaviors being subjected to more significant sanction. Examples of sanctions and disciplinary action for non-compliance may include but not be limited to:

- Discipline of individuals who fail to report known non-compliant conduct
- Discipline of those persons involved in non-compliant conduct
- Discipline of managers or supervisors if the misconduct reflected poor supervision or lack of diligence
- Discipline for retaliation directed at individuals who report non-compliance

The degree of discipline for employees may range from counseling and retraining up to and including termination of employment based on the situation, and as outlined in the CCDA Employee Handbook. For contractors, subcontractors, agents, and other affected individuals, disciplinary measures may include counseling, retraining, or other sanctions as outlined in the contract/agreement. For Agency Boards, and Trustees, disciplinary action may be taken as outlined in CCDA bylaws.

Code of Conduct

The Code of Conduct aims at assisting members at all levels of the organization understand their responsibilities to demonstrate professional and ethical conduct that is grounded in the CCDA mission. The Code of Conduct and Corporate Compliance Plan are included in the required training for staff, contractors, affected individuals, Board members including the BOT and a copy is available to each member. This Corporate Compliance Plan and the Code of Conduct are available as links on CCDA website at https://www.ccrcda.org/about-us/corporate-compliance/.

The Code of Conduct, which is part of CCDA Corporate Compliance Plan, was approved by the BOT of CCDA. All employees and members are expected to adhere to the guidance within the code, and to seek assistance when applicable.

Medicaid Required Provider Compliance

The New York State Office of Medicaid Inspector General (NYS OMIG) has implemented additional regulatory requirements as of January 2023 that apply to certain Medicaid providers. CCDA agencies that meet the NYS OMIG regulatory definition of a "required provider" are required to comply with the directive of the NYS OMIG.

This Compliance Plan, in conjunction with CCDA Code of Conduct, and the standards, procedures, and workplans outlined in this plan are designed to ensure CCDA Medicaid Required Providers have an effective compliance plan, as required by 18NYCRR 521.1. Throughout this plan, we refer to CCDA Members, which is defined to include any "affected individuals" as defined in 18NYCRR 521.1.

Key definitions from 18NYCRR 521.1:
Required Provider: any person subject to the provisions of Article 28 or 36 of the Public Health Law; any person subject to the provisions of Articles 16 and 31 of the Mental Hygiene Law; any managed care provider or managed long-term care plan; and any other person for whom the Medicaid program is, or is reasonably expected to be, a substantial portion of their business operations.

Affected Individual: all persons who are affected by the required provider's risk areas including employees, the chief executive officer, and other senior administrators, managers, contractors, agents, subcontractors, independent contractors, and governing body and corporate officers.

Sanction Screening

New and existing employees, members of the BOT, the Agency Board of Directors, medical doctors authorizing residential services, vendors and other affected individuals will be screened for sanctions related to participation in government-funded programs. Sanction screening will be done at the time of hire or onboarding as a member of CCDA, and every 30 days there after. The databases of the following entities will be screened to determine exclusion:

- U.S. Department of Health and Human Services Office of Inspector General
- U.S. General Services Administration (GSA)
- NYS Office of Medicaid Inspector General

All members are responsible for promptly informing the Compliance Department of any government sanction or exclusion. Contractors, subcontractors, and vendors who are involved in CCDA Medicaid Programs are subject to this compliance plan, and are responsible for maintaining records of their exclusion monitoring every 30 days for their employees and subcontractors engaged with CCDA.

The Standard and Procedure on Government Exclusion Monitoring & Sanction Screening provides additional guidance on sanction screening, including the actions that would be taken in the event of a potential exclusion or debarment finding for a member, to ensure compliance with exclusion-related requirements. The Compliance Department will be responsible for monitoring compliance.

Confidentiality & Privacy

CCDA values the privacy and protection of confidential information of individuals receiving services, employees, members and agency business records. Therefore, CCDA is committed to full compliance with all applicable federal, state and funder-specific data privacy and confidentiality requirements. Since CCDA provides services that have differing confidentiality requirements, guidance on this topic is provided by CCDA Confidentiality Standard and Procedures, program-specific policies, and where applicable, the CCDA HIPAA Handbook.

Conflict of Interest

CCDA is obligated to conduct its operations while prohibiting an actual or potential Conflict of Interest (COI). The Code of Conduct, and COI

Standard and Procedure provides guidance for members on COI disclosure and appropriate mitigation/management when a COI arises.

Record Retention

CCDA is committed to maintaining business and client records in accordance with applicable requirements. The CCDA Record Retention Standard and Procedure, as well as Agency and program-specific policies, provide guidance on record retention timeframes, file maintenance processes and record destruction processes.

All records related to the Compliance Program will be maintained for at least six years.

Government Investigations and Reviews

CCDA, as part of its commitment to full compliance with state and federal laws, will cooperate with all reasonable requests made by any government agency during the course of a review or investigation. CCDA also recognizes that staff and clients may be asked to participate in such reviews or investigations. CCDA will provide appropriate support to staff and clients who may be asked to participate in reviews or investigations.

Closing Statement of Commitment

CCDA, in accordance with its mission, is an organization committed to providing the highest quality services. Based on our values and principles, CCDA works diligently to be in compliance with the laws, codes, rules and regulations of state and federal entities that guide the delivery of our services. In addition to compliance with applicable program requirements, CCDA is committed to an organizational culture that supports education and training, continuous quality improvement, ethical conduct and decision making and a culture of transparency.

ACKNOWLEDGEMENT OF RECEIPT OF
CATHOLIC CHARITIES CORPORATE COMPLIANCE PLAN

As an employee or member of Catholic Charities of the Diocese of Albany, my signature below is acknowledgement that I have received the Catholic Charities Corporate Compliance Plan and agree to abide by the standards, procedures and provisions described therein.

Name (Please Print): _____

Signature: _____

Date: _____