



Corporate Compliance: Policy Development, Approval and Maintenance

Purpose:

To provide a framework for effective, timely development, approval, implementation, review, and revision of policies.

Regulatory/Additional Authority:

Social Services Law 363-D
18 NYCRR Part 521

Scope:

All Advocates Employees/Departments.

Responsible Employee (Title) and/or Department:

The Compliance Officer (Director of Compliance, Quality & Incident Management) or their designee.

Definitions:

Affected Individuals – All Advocates’ employees including the Executive Director and senior leadership, contractors, subcontractors, independent contractors, agents, corporate officers, and the Board of Directors.

Policy

It is the policy of Advocates (sometimes referred to as “organization” or “the organization”) to establish a standardized process for policy development, approval, implementation, review, and revision.

Procedure

1. Policies shall be developed and/or revised to meet legal and regulatory requirements and to be consistent with other Advocates’ policies.
2. All policies will be developed on the Advocates’ policy template and include the following information:
 - a) Policy Number – Number of the corresponding policy prefaced with the Department abbreviation.
 - b) Effective Date
 - c) Revision Date
 - d) Supersedes – State if the policy replaces another policy or guidance document.
 - e) Title - Name of the policy

- f) Purpose - A brief description of why the policy is being promulgated and/or what it seeks to accomplish.
 - g) Regulatory/Additional Authority - Regulatory reference numbers (external), other guidance documents and/or training modules.
 - h) Scope - Who the policy applies to; positions, titles and/or department designations.
 - i) Responsible Employee/Department - The “owner” of the policy. Administers, oversees, and amends policy.
 - j) Definitions - Meaning of uncommon terms, terms used in a unique way by Advocates and/or terms as defined by regulatory/oversight agencies.
 - k) Policy Statement
 - l) Procedures - Detailed description of the steps necessary to implement the policy.
 - m) Attachments - List of additional documents/resources related to implementation of the policy. Include copies and/or electronic file reference to access the attachment.
 - n) Approvals - Electronically captured names, signatures, and dates of signatures for those approving the policy.
3. The Responsible Employee/Department is responsible for policy implementation and oversight. The Responsible Employee/Department shall be responsible for recommending the timely development, approval, implementation, review, and revision of new and existing policies.
 4. The Compliance, Quality, Leadership Subcommittee will be responsible for the overall coordination and implementation of any new or revised policy. The Compliance Officer, Executive Director and other Senior Leadership will be consulted as needed throughout the process of developing or revising any policy to ensure compliance with legal and regulatory requirements and consistency with other Advocates’ policies.
 5. All newly created or revised policies will be approved by the Responsible Employee/Department’s Department Director and submitted to the Compliance, Quality, Leadership Subcommittee for review and approval prior to presentation to the Compliance Committee. Once approved by the Compliance, Quality, Leadership Subcommittee, the policy will be presented to the Compliance Committee.
 6. The Compliance Committee will review new or revised policies and either request revisions or approve the policy.
 7. Approved policies will be distributed by the Responsible Employee/Department to all affected individuals within 10 business days of final approval via secure email. The Responsible Employee/Department will document distribution by saving a PDF of the distribution email to the Policy Share Point site with the approved policy.
 8. Electronic copies of approved policies including electronically captured approval signatures will be saved to the Policy Share Point site by the Responsible Employee/Department. In the unlikely event a policy is approved with a “wet” signature, a hard copy of the original document will be saved in the Responsible

Employee/Department's Policy binder in addition to a scanned electronic copy saved to Share Point.

9. The Compliance, Quality, Leadership Subcommittee, or designee shall develop a plan for informing and educating all affected individuals of the organization's new and revised policies.
10. The Compliance, Quality, Leadership Subcommittee, or designee shall maintain an ongoing file of revised policies, substitute policies and current policies. As policies are revised or replaced, they shall **not** be discarded but remain on file.
11. All policies will be reviewed annually by the Responsible Employee/Department to determine if there are any revisions that are appropriate or required. If there are necessary revisions to the policy, the updated policy will follow the workflow for approval.

Attachments

N/A

Sanction Statement

Non-compliance with this policy may result in disciplinary action, up to and including termination.

Compliance Statement:

As part of its ongoing Compliance Program review and improvement process, Advocates will review this policy at least annually and as needed to respond to changes in laws or regulations and to determine if this policy:

- Has been implemented.
- Is being followed.
- Is effective.
- Needs to be updated.

Record Retention Statement:

Advocates will retain this policy and all subsequent revisions, and any related documentation will be retained for a period of, at minimum, six years.

Approval(s)

Approved by: Carol Gentry, Compliance Officer
(Director of Compliance, Quality & Incident Management)

Signature: Carol Gentry DATE: 03-24-2023

Approved by: Amy Dugliss, Executive Director




Signature: Amy Dugliss DATE: 03-24-2023

Approved by: Beth Henderson, Chairperson, Compliance Committee

Signature: Beth Henderson DATE: 03-24-2023

Signature Certificate

Reference number: PYS2A-7SLXW-NP7BK-BX77H

Signer	Timestamp	Signature
Carol Gentry Email: carol@advocatesincorporated.org Sent: 24 Mar 2023 19:17:46 UTC Viewed: 24 Mar 2023 19:17:51 UTC Signed: 24 Mar 2023 19:18:17 UTC		 IP address: 184.153.235.98 Location: Syracuse, United States
Amy Dugliss Email: amy@advocatesincorporated.org Sent: 24 Mar 2023 19:17:46 UTC Viewed: 24 Mar 2023 19:25:27 UTC Signed: 24 Mar 2023 19:25:44 UTC		 IP address: 71.115.192.50 Location: Liverpool, United States
Recipient Verification: ✓ Email verified	24 Mar 2023 19:25:27 UTC	
Beth Henderson Email: beth@advocatesincorporated.org Sent: 24 Mar 2023 19:17:46 UTC Viewed: 24 Mar 2023 19:28:52 UTC Signed: 24 Mar 2023 19:29:32 UTC		 IP address: 67.249.38.28 Location: Manlius, United States
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Page 1 of 1



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