



Corporate Compliance: Policy Development, Approval and Maintenance

Purpose:

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

Regulatory/Additional Authority:

Social Services Law 363-D
18 NYCRR Part 521

Scope:

All Affected Individuals

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 Compliance policy development, approval, implementation, review, and revision.

Procedure

1. Compliance policies shall be developed and/or revised to meet legal and regulatory requirements and to be consistent with other Advocates’ policies.
2. All Compliance 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 Compliance policies.
 4. The Compliance, Quality, Leadership Subcommittee will be responsible for the overall coordination and implementation of any new or revised Compliance policy and will be consulted as needed throughout the process of developing or revising any Compliance policy to ensure compliance with legal and regulatory requirements and consistency with other Advocates’ policies.
 5. All newly created or revised Compliance 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 Compliance 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 Compliance policy.
 7. Approved Compliance policies will be distributed by the Responsible Employee/Department to all affected individuals within 10 business days of final approval by posting to the Advocates website and notifying all affected individuals via Constant Contact that new information has been posted. A copy of the Constant Contact message will be retained to verify distribution.
 8. Electronic copies of approved Compliance policies including electronically captured approval signatures will be saved to Share Point 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 Compliance policies.
10. The Compliance, Quality, Leadership Subcommittee, or designee shall maintain an ongoing file of revised Compliance policies, substitute policies and current policies. As policies are revised or replaced, they shall **not** be discarded but remain on file.
11. All Compliance 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 Compliance 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, Director of Compliance, Quality & Incident Management

Signature: Carol L. Gentry DATE: 03-28-2024

Approved by: Amy Dugliss, Executive Director

Signature: Amy Dugliss DATE: 03-28-2024

Approved by: Beth Henderson, Chairperson, Compliance Committee

Signature: Beth Henderson DATE: 03-28-2024