

AGENCY PERSONNEL AND RESPONSIBILITIES

- A.**
- B.**
- C.**

D. THE AGENCY PERSONNEL AND RESPONSIBILITIES

The Corporate Compliance Officer

The Compliance Officer (CO) is the Chair of the Corporate Compliance Committee (explained below.) The CO has direct lines of communication to the Chief Executive Officer, the Compliance and Governance Committee of the Board of Directors and Agency counsel. The CO shall report to the Executive Director and the Chair of the Compliance and Governance Committee. An Organization Chart is attached at Attachment #1.

Job Duties: The CO is directly obligated to serve the best interests of ILA, its consumers and employees. Responsibilities of the CO include, but are not limited to:

- Developing and implementing compliance policies and procedures (P&P)
- Overseeing and monitoring the implementation of the compliance program
- Directing agency internal audits established to monitor effectiveness of compliance standards
- Providing guidance to management, medical/clinical program personnel and individual departments regarding corporate compliance, governmental laws, rules and regulations
- Updating, periodically, the Compliance Plan as changes occur within Independent Living Association, Inc., and/or in the law and regulations or governmental and third party payers
- Overseeing efforts to communicate awareness of the existence and contents of the Compliance Plan
- Coordinating, developing and participating in the Corporate Compliance educational and training program
- Directing independent contractors (consumer care, vendors, billing services, etc.) to www.ILAonline.org to obtain information about the requirements of Agency's Compliance Plan
- Actively seeking up-to-date material and releases regarding regulatory compliance
- Maintaining a reporting system (hotline) and responding to concerns, complaints and questions related to the Compliance Plan
- Acting as a resourceful leader regarding regulatory compliance issues.
- Investigating and acting on issues related to compliance
- Coordinating internal investigations and implementing corrective action

The Corporate Compliance Specialist: Job Description

Job Duties: The CCS is a full time position (35 hrs./week) responsible for auditing ILA service provision billing and support documents, conducting on-site compliance reviews and advancing the Agency's adherence with the principles of Corporate Compliance. The Corporate Compliance Specialist reports to the Compliance Officer.

- Enforces ILA's Corporate Compliance Plan as per OMIG regulations
- Conducts regular monthly billing audits of all ILA programs to include; (1) IRA Residential Habilitation (2) ILA day habilitation (3) ILA ICF program and coordinates ongoing monitoring of coding accuracy and documentation adequacy in order to identify systemic and process problems.
- Provides results of all audits completed to the Compliance Officer which will serve as the basis for corrective measures. Files all audit results electronically on the ILA network for review by board and executive staff.
- Distributes and collects annual Code of Conduct Attestation forms from key ILA employees. Responsible for documentation and storage of the completed Code of Conduct.
- Ensures annual ILA Corporate Compliance Training as required is conducted with all employees. Responsible for documentation of this training.
- Participates in ongoing and required training to enhance skills in performing job tasks.
- Provides feedback on the results of auditing and monitoring activities to appropriate responsible department personnel.
- Initiates corrective action plans with the responsible staff to ensure resolution of problem areas identified during an internal investigation and/or auditing/monitoring activity are corrected in response to identified problems
- Reviews ILA programs and documentation "on-site" and provides immediate feedback to the responsible staff when issues are discovered. Provides "on site" staff training as required. Reports any non-compliance issues detected through "on-site" auditing and monitoring to the Compliance Officer.
- Recommend in writing to explain compliance program or coding policy violations and procedures to the Human Resources Department for possible disciplinary action.
- Ensures the appropriate dissemination and communication of corporate compliance regulation policy and guideline changes to affected personnel.
- Serves as a resource for Residential Managers and Clinicians to obtain information or clarification on accurate and appropriate documentation standards.

- Serves on the Corporate Compliance Committee, Safety Committee and Code Rule 59 committee.
- Disseminates audit information to Executives, Program Administrators, and the Corporate Compliance Committee upon request of Corporate Compliance Officer.
- Train all staff on the principles of Corporate Compliance during agency orientation.
- Conducts an annual review of the ILA Corporate Compliance Program effectiveness as per OMIG.
- Actively seeking up-to-date material and releases regarding regulatory compliance and Corporate Compliance.
- Other duties as requested by the Corporate Compliance Officer.

Please sign and date below indicating your understanding of this job description:

Signature

Date