



Advocates Policy #: C11

Effective Date: 3/28/2023

Reviewed: 3/19/24-No Changes

Reviewed: 3/31/25-No Changes

Reviewed: 3/12/26-No Changes

Revised: N/A

Supersedes: N/A

Corporate Compliance: Role & Responsibilities of the Compliance Committee

Purpose:

Advocates (sometimes referred to as “organization” or “the organization”) is committed to the operation of an effective Compliance Program. Therefore, Advocates established the Compliance Committee to support and monitor the results of compliance functions and determine the organization’s strategy for promoting compliance.

Regulatory/Additional Authority:

Social Service 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 to ensure that the organization maintains an effective Compliance Program in compliance with regulatory standards. This Policy defines the roles and responsibilities of the Compliance Committee and their duty to help ensure that Advocates has an effective Compliance Program.

Procedures

1. The Compliance Committee is appointed by the President of the Board of Directors and Executive Director to advise and assist the Compliance Officer with the implementation of the Compliance Program. The Compliance Committee will report directly to the Executive Director and Board of Directors.
2. The Compliance Committee will be comprised of Senior Leadership, at minimum.

3. The Compliance Committee will meet on a regular and routine basis, but at minimum quarterly. Meeting minutes will be recorded. The Compliance Officer will maintain the minutes of all meetings.
4. The organization will develop and implement a Compliance Committee Charter. The Charter will outline the Compliance Committee's duties and responsibilities, membership, designation of a chairperson, and frequency of meetings.
5. The Compliance Committee will review and update the Compliance Committee Charter at least annually.
6. Affected Individuals will be introduced to the role and responsibilities of the Compliance Committee as part of the Compliance Program education and training.
7. The Compliance Committee is responsible for the following:
 - Analyzing the regulatory environment where Advocates does business, including legal requirements with which it must comply.
 - Reviewing and approving new and revised policies and procedures for implementation.
 - Informing the Board of Directors of new and revised policies and procedures.
 - Reviewing and assessing existing policies and procedures that address risk areas for possible incorporation into the Compliance Program.
 - Reviewing and monitoring Compliance Program training and education to ensure that they are effective and completed in a timely manner.
 - Ensuring that the organization has effective systems and processes in place to identify Compliance Program risks, overpayments, and other issues and has effective policies and procedures for correcting and reporting such issues.
 - Working with departments to develop standards and policies and procedures that address specific risk areas and to encourage compliance according to legal and ethical requirements.
 - Coordinating with the Compliance Officer to ensure that the written policies and procedures and Standards of Conduct are current, accurate, and complete.
 - Developing internal systems and controls to carry out compliance standards, Standards of Conduct, and policies and procedures.

- Coordinating with the Compliance Officer to ensure communication and cooperation by Affected Individuals on compliance-related issues, internal or external audits, or any other function or activity.
- Developing a process to solicit, evaluate, and respond to complaints and problems.
- Monitoring internal and external audits to identify issues related to non-compliance.
- Implementing corrective and preventative action plans and follow-up to determine effectiveness.
- Ensuring the development and implementation of an annual Compliance Work Plan.
- Advocating for sufficient funding, staff, and resources to be allocated to the Compliance Officer to carry out duties related to the Compliance Program.
- Ensuring that the organization has appropriate systems and policies in place that effectively identify risks, overpayments, and other areas of concern including fraud, waste, and abuse.
- Monitoring and evaluating the organization's Compliance Program for effectiveness at least annually and making recommendations for necessary modifications to the Compliance Program as applicable.
- Developing and implementing a Compliance Committee Charter. The Charter will outline the Compliance Committee's duties and responsibilities, membership, designation of a chairperson and frequency of meetings. The Charter will be reviewed and updated annually.

Attachments

- Compliance Committee Charter
- Compliance Committee Meeting Agenda/Minutes-Template

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: _____ DATE: _____

Approved by: Amy Dugliss, Executive Director

Signature: _____ DATE: _____

Approved by: Beth Henderson, Chairperson, Compliance Committee

Signature: _____ DATE: _____