

## ***Corporate Compliance Plan***

---

### **Overview**

Cornerstone/Hernandez Home AFC, Inc. is committed to the quality service delivery to person's served. Cornerstone/Hernandez Home AFC, Inc. ensures that service delivery is effective and efficient through the continual monitoring of the organization's operations. Cornerstone has established standards that are designed to communicate the intention for the organization to participate in ethical and legal behavior with the hope of preventing fraud, waste, abuse and other unethical practices. Cornerstone's desire is for all staff to participate and meet high standards and expectations within the industry. This plan also provides a process for which complaints, grievances and violations are received with prompt resolution.

### **Corporate Compliance Standards**

- Ensure the compliance with all governing statutes both federal and state.
- Monitor claims for services rendered to ensure accuracy and timeliness.
- Monitor organizational practices to avoid fraud, waste and abuse.
- Update all administrative members as well as staff when there is a change to policy/procedures including the Corporate Compliance Plan.
- Maintain knowledge of changing laws and standards as they relate to the organization's operations.
- Monitor the organization for unethical work practices of all employees.
- Monitor service delivery to ensure that it is person centered and according to contract language.
- Ensure that the code of ethical practices is followed and understood by all employees.

### **Corporate Compliance Officer**

Corporate Compliance Officer: Cornerstone/Hernandez Home AFC, Inc. Corporate Compliance Officer (CCO) is responsible for maintaining all regulatory laws and contracts. Such laws might include HIPAA, HITECH, DRA, FCA including fraud, waste and abuse as well as Whistleblowers. The CCO responds to violations of rules, regulations, policies, procedures, standards of conduct, and unethical behavior.

The CCO works with departments within the organization to maintain uniform handling of such violations. The CCO reviews all compliance issues/concerns within the organization and ensures that they are handled appropriately. Additionally, the CCO will monitor the performance of the internal compliance program (with all governing laws and contracts) and takes appropriate steps to ensure effectiveness of the program.

Cornerstone/Hernandez Home AFC, Inc. appointed Corporate Compliance Officer (CCO) is Derek Ball. Mr. Ball has an appointed letter from the CEO maintained in his personnel record. Mr. Ball maintains reporting mechanisms of compliance issues and strives to be accessible to all stakeholders. Contact information for questions or for filing a complaint is available on the organization's website, included orientation material for all residents, and available at the home in the form of complaint forms.

Complaints can be done at any time and can be made openly or anonymously. Any employee of Cornerstone/Hernandez Home AFC, Inc. can direct complaints to either the crisis line or directly to Mr. Ball. In the event that there is a suspected violation of the organizations policies or any governing laws, Cornerstone/Hernandez Home AFC, Inc. will conduct an internal investigative process. If there are suspected violations in relation to any laws, the appropriate governing bodies will be contacted immediately to report any such issue.

The organization has a corporate compliance department which is established for the purpose of steering the organization in ways to maintain compliance with laws, standards, policies and procedures. The department maintains a culture of compliance and ethical conduct. The CCO is head of the department and utilizes the department's expertise to implement the Corporate Compliance Plan.

The department members include the following individuals: The Corporate Operations Officer, Human Resource Director, Medical Director, Health and Safety Director and Care Coordinating Director. The Compliance Department communicates the corporation's practices to staff members, assesses the organizations risk, develops policy and procedure, conducts internal reviews and investigations.

The Corporate Compliance department is responsible for modeling expected behaviors of the organization, reinforce ethical behavior, legal practice and adherence to the Mission, Vision and Values. The department also ensures that resources are available to resolve any ethical dilemmas and supervise with strict compliance with policies and regulation so that any violation would result in disciplinary action up to termination.

### **Complaint Reporting**

Cornerstone/Hernandez Home AFC, Inc. adheres to laws, regulations, internal/external policies and procedures as well as the Mission, Vision and Values of the organization. There is recognition that the organization may at times unintentionally fall short. Our organization is committed to taking appropriate actions if there are suspected violations regarding any governing laws, regulations or internal/external policies and procedures.

Our desire is to promote a positive image to all stakeholders as well as the community. For that reason, our administration maintains an obligation to conduct investigations of alleged violations of these standards. Our administration is committed to a prompt, thorough as well as impartial investigation process.

Complaints of all stakeholders are taken very seriously. In order to resolve complaints, the department head which is responsible for overseeing the operations pertaining to the compliant will conduct the investigation. Once the investigation is conducted, together with the CCO, a resolution is found.

Individuals reporting the complaint may remain anonymous and given a name, date, and numerical identifier so that a resolution can be relayed once the investigation is completed. The choice of the numerical identifier should be up to the person filing the complaint.

All stakeholders are free from retaliation and any corrective measures will be conducted through best practice and unbiased.

### **Policy and Procedure Implementation**

The organization has adopted several policies and procedures in order to maintain guidance for business operations. They are designed with the idea that all employees will have the capability of working more efficiently and behave in an ethical way. Written policies and procedures help reduce the prospect of erroneous claims and fraudulent activity. The CCO provides oversight to ensure that implementation and practice of all policies and procedures is maintained. Written policies and procedures are written related to all legal and regulatory standards. The purpose of the policies related to the Corporate Compliance Plan is to establish ethical standards. Policies that guide compliance include:

- Confidentiality/HIPAA Policies
- Technology Plan
- Cultural Competence and Diversity Plan
- Sentinel Event Policy
- Conflict of Interest Policy
- Breach Notification Policy
- Whistle Blowers Policy (Employee Handbook)
- Standards of Conduct (Employee Handbook)
- Risk Management Plan
- Duty to Warn Policy



- Social Media Policy
- Grievance and Appeals Policy
- Consent for Treatment
- Subpoenas, Search Warrants and Investigation Policy
- Financial Policies
- Credentialing and Privileging Policy
- Quality Management Plan
- Standards of Conduct Policy
- Code of Ethical Practices Policy

### **Corporate Compliance Training and Education**

Cornerstone/Hernandez Home AFC, Inc. ensures that all team members receive corporate compliance training annually through the organizations Human Resource Department. Education includes the distribution of the Corporate Compliance Plan. Upon receipt of the plan, staff must sign an attestation that indicates the following:

- They have received the plan, including the code of ethics.
- The plan has been read, reviewed and understood.
- Any questions regarding the plan have been answered.
- The staff member is willing to fully participate in the Corporate Compliance program and conduct themselves in accordance to the code of ethics.
- Willingness to report any lack of or potential lack of compliance with any federal, state or local laws which the staff member is aware.

The CCO is responsible to ensure that ongoing, routine training opportunities in policy and procedures are completed. Updates to all policy and procedure changes are relayed to the entire staff body when they are created.

### **Corporate Responsibility Plan**

Cornerstone/Hernandez Home AFC, Inc. has a commitment to guarantee ethical principles are met, respect for all stakeholders and a commitment to creating a corporate culture of personal responsibility and ethical business practices. To promote positive public image that aligns with the Mission, Vision and Values of the organization. Company activities will be transparent and conduct in a manner that promotes inclusion, diversity and human rights opportunities. Our goal is to do the following:

- Ensure that all stakeholders understand the requirement to immediately report to the crisis line or CCO any suspicion of fraud, waste or abuse in connection with Cornerstone/Hernandez Home AFC, Inc.
- Create an environment where all employees understand the organizations Mission, Vision and Values through appropriate training.
- Ensure that all employees of Cornerstone/Hernandez Home AFC, Inc. are committed to the continuous improvement of service delivery.
- Provide opportunities for residents to enhance their life through community inclusion and integration.
- Maintain a culture of gentleness with human rights and values in mind.
- Create an environment that supports basic health, safety and accident prevention.

### External Auditing

External audits are conducted by each of the organizations contracting agencies. Cornerstone/Hernandez Home AFC, Inc. strives to obtain perfect auditing scores to avoid any findings for which a corrective action plan should need to be created. Occasionally, the organization falls short requiring a response to the audit through a corrective action plan.

The organization is committed to timely responses to external regulatory agencies. Once the plan of correction has been submitted, it is the responsibility of the Corporate Compliance Officer to ensure that the proposed actions are communicated within the organization.

Cornerstone/Hernandez Home AFC, Inc. will operate in adherence to federal, state and local regulations or laws pertaining to service provision and funding sources. The following actions will be completed once a regulatory agency requires a corrective action:

- The Corporate Compliance Officer and Licensee of the location will review the recommendations and develop a corrective action plan in response to the issue.
- The Licensee of the home will develop a corrective action plan in response to the finding.
- The corrective action plan will include a) The individuals affected in the finding b) The corrective action that will create compliance with the violation/recommendation c) Target dates for completion d) How follow up monitoring will be completed and who will be responsible for the monitoring.

### External Investigations

During investigations, the organization is committed to maintaining transparency as one of its guiding values. In order to ensure that the organization maintains transparency all suspected licensing or resident rights violations are reported promptly.

#### 1) Licensing-

Licensing corrective action plans are submitted based on the best probable corrective action the licensee can utilize to reduce risk and future occurrence. All licensing rule violations are taken seriously and tracked quarterly. Patterns of recurrence are also analyzed annually as the fiscal year ends. Corrective action plans are kept in the electronic medical records under each community. Corrective action plans are available for review upon request of any governing body.

#### 2) Resident Rights

Resident rights corrective action plans are also submitted based on the best probable corrective action that the administration can utilize to reduce future occurrence. All resident rights violations are also taken seriously and tracked quarterly. Patterns of recurrence are analyzed annually for the opportunity to discover patterns. All resident rights corrective action plans are kept in the electronic medical records

#### **Internal Financial Review**

The acceptance for federal funding requires Cornerstone/Hernandez Home AFC, Inc. to be responsible residents by continual financial auditing of all incoming and outgoing monies. Our organization adheres to the Generally Accepted Accounting Principles. The monitoring of service utilization and billing verification ensures that residents are receiving treatment at a level consistent with their individualized plan of service and authorized level of care. Internal financial auditing will determine that billing is accurate and reflects the date, duration and type of service delivered.

Internal auditing activities are conducted to ensure that there is no presence of fraudulent activities. Cornerstone/Hernandez Home AFC, Inc. is dedicated to business in a legal and ethical manner. Cornerstone/Hernandez Home AFC, Inc. fraud, waste and abuse compliance program depicts a comprehensive plan for detection, prevention and reporting of fraud, waste and abuse across various categories of health care. Cornerstone's written policies, procedures and code of ethical practices mandate that each employee shall comply with all federal and state standards.



Cornerstone/Hernandez Home AFC, Inc. works hard to maintain goals and objectives in a person-centered plan which are measurable and obtainable to ensure that billing is accommodating necessary services. In doing such, the organization is overseeing how funds are being used and reported.

### **Excluded Parties**

Cornerstone/Hernandez Home AFC, Inc. is committed to maintaining compliance with section 1128 of the Social Security Act and from Medicare and State Health Care programs under section 1156 section A by checking the Office of Inspector General (OIG) Website for excluded individuals. OIG checks will be conducted prior to hiring an individual as well as monthly thereafter. In the event that an individual is excluded, they will not be eligible to deliver services to residents within the organization, the human resource department will inform the individual of steps.

### **Disciplinary Actions**

Employees of Cornerstone/Hernandez Home AFC, Inc. will receive a handbook at the time of hire and training on all employment policies and procedures. Personnel concerns are kept confidential, violators of the Corporate Compliance Plan will not be made public.

Violations of the Corporate Compliance Plan and all policies related to such will be addressed timely and through a consistent disciplinary action. Violations of the Corporate Compliance Plan will be thoroughly investigated through conducting a Sentinel Event and then reviewed by the CCO.

Education and training regarding the Corporate Compliance Plan is paramount and addressed upon hire and during annual training. All related policies will be read in conjunction with the plan. The purpose of this training is to reduce the possibility of fraud, waste, abuse and other violations of law/contract.

Remedial actions could include (but are not limited to) the following:

- Reassignment
- Verbal Counseling
- Suspension Without Pay
- Demotion
- Separation from Employment
- Education/Training
- Written Reprimand

Remedial action will be determined through careful investigation of the event in its entirety. The Human Resource Department as well as the CCO will actively engage staff with any violation of the Corporate Compliance Plan.

### Corporate Compliance Goals

Performance Indicators	Objective	Application	Timeframe	Collection Source	Responsible Personnel	Measure	Performance Target
Billing Verification will be completed quarterly.	Efficiency	Person Served  Contracting Agency	Quarterly	Billing Verification Forms	Care Coordinating Team	>95% of > or = 10% of persons served have appropriate billing in accordance to the billing verification form.	>95%
Internal Financial Review	Efficiency	All Stakeholders	Quarterly	Internal Auditing Report Form	Compliance Team	100% of claims submitted in the month of the review are accurate.	100%
Corporate Compliance Training is completed prior to hire and annually thereafter	Effectiveness	Staff	Quarterly	Compliance Reports	Human Resource Team	100% of staff members complete training in corporate compliance upon hire and annually thereafter.	100%
Fraud, Waste and Abuse Posters in all Cornerstone/Hernandez Home AFC, Inc. homes	Effectiveness	All Stakeholders	Quarterly	NA	Compliance Team	100% of homes will have postings by October 1, 2022	100% by October 15, 2022

( 2 6 9 ) 6 2 8 - 2 1 0 0

CORNERSTONE  
HERNANDEZ HOME AFC  
SPECIALIZED RESIDENTIAL SERVICES

3 0 2 S S T A T E S T  
G O B L E S , M I 4 9 0 5 5

W W W . C O R N E R S T O N E A F C . C O M