



CORPORATE COMPLIANCE POLICY

I. Policy

It has been and continues to be the policy of Liberty Resources to comply with all applicable federal, state and local laws and regulations, and payer requirements. It is also Liberty Resources policy to adhere to the Code of Ethics that is adopted by the Board of Directors, the Chief Executive Officer and the Compliance Committee.

II. Commitment

We have always been and remain committed to our responsibility to conduct our business affairs with integrity based on sound ethical and moral standards. We will hold our employees, contracted practitioners, and vendors to these same standards.

Liberty Resources is committed to maintaining and measuring the effectiveness of our Compliance policies and standards through monitoring and auditing systems reasonably designed to detect noncompliance by its employees and agents. We shall require the performance of regular, periodic compliance audits by internal and/or external auditors who have expertise in federal and state health care statutes, regulations, and health care program requirements.

III. Responsibility

All employees, contracted practitioners, and vendors shall acknowledge that it is their responsibility to report any suspected instances of suspected or known noncompliance to their immediate supervisor, the Chief Executive Officer or the Compliance Officer. Reports may be made anonymously without fear of retaliation or retribution. Failure to report known noncompliance or making reports which are not in good faith will be grounds for disciplinary action, up to and including termination. Reports related to harassment or other workplace-oriented issues will be referred to Human Resources.

IV. Policies and Procedures

Liberty Resources will communicate its compliance standards and policies through required training initiatives to all employees, contracted practitioners, and vendors. We are committed to these efforts through distribution of this Compliance Policy and our Code of Conduct and Philosophy.

V. Enforcement

This Compliance Policy will be consistently enforced through appropriate disciplinary mechanisms including, if appropriate, discipline of individuals responsible for failure to detect and/or report noncompliance.

VI. Agency Response

Detected noncompliance, through any mechanism, i.e. compliance auditing procedures, confidential reporting, will be responded to in an expedient manner. We are dedicated to the



resolution of such matters and will take all reasonable steps to prevent further similar violations, including any necessary modifications to the Compliance Plan.

VII. Due Diligence

Liberty Resources will, at all times, exercise due diligence with regard to background and professional license investigations for all prospective employees, contractors, vendors, and members of the Board of Directors.

Code of Ethics and Philosophy

I. Belief

All people deserve the opportunity to make decisions regarding their lives and to achieve their highest potential. We believe each person has the ability to change and that all people should be treated with dignity and respect. These beliefs are demonstrated in the value and support shown to those served as well as to the staff of Liberty Resources.

II. Core Values

Liberty Resources' values drive its service provision, administrative practice, staff development and business management.

Excellence

Liberty Resources demonstrates its commitment to excellence by striving to exceed established standards to achieve optimal outcomes.

Integrity

Liberty Resources strives to align daily practice with its mission and values.

Diversity

Liberty Resources is strengthened when it embraces a broad array of diverse talents and perspectives.

Liberty Resources strives to maintain welcoming and inclusive environments that ensure that all people are treated with dignity and respect.

Self-Determination

All people deserve the opportunity to make decisions regarding their lives and to have the opportunity to achieve their highest potential.

Service

Staff go above and beyond to meet the needs of individuals, families and communities through consistent, compassionate service.

Innovation Liberty Resources is willing to take risks and engage in creative approaches to respond to the challenges of a constantly changing environment and society.

Fiscal Responsibility

Business management and financial stability enable the agency to achieve strategic goals, to be an employer of choice and to maintain a supportive environment so that employees can focus on high quality service delivery.

III. Mission



To assist individuals and families in need of achieving an improved quality of life by providing residential and non-residential services tailored to meet their particular needs. We offer progressive services in the least restrictive, most community-based setting possible for each individual. We are committed to excellence in all aspects of service delivery, staff development and business management

IV. Expectations

We ensure that all aspects of consumer care and business conduct are performed in compliance with our mission/vision statement, policies, and procedures, professional standards and applicable governmental laws, rules and regulations and other payer standards. Agency expects every person who provides services to our consumers to adhere to the highest ethical standards and to promote ethical behavior. Any person whose behavior is found to violate ethical standards will be disciplined appropriately.

Employees are expected to maintain complete, accurate and contemporaneous records as required by Liberty Resources. The term "records" includes all documents, both written and electronic, that relate to the provision of Liberty Resources services or provide support for the billing of Liberty Resources services. Records must reflect the actual service provided. Any records to be appropriately altered must reflect the date of the alteration, the name, signature and title of the person altering the document and the reason for the alteration if not apparent. No person shall ever sign the name of another person to any document. Signature stamps shall not be used. Backdating and predating documents is unacceptable and will lead to discipline up to and including termination. When any person knows or reasonably suspects that the expectations above have not been met, this must be reported to immediate supervisors, the Compliance Officer (CO) or the Chief Executive Officer, so each situation may be appropriately dealt with. The CO may be reached at (315) 425-1004.

The Role of the Compliance Officer

I. Compliance Officer

The Board of Directors and CEO of Liberty Resources designate the Compliance Officer (CO). The CO has direct lines of communication to the Chief Executive Officer, the Board of Directors.

II. Job Duties

The CO is obligated to serve the best interests of the agency, 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 Liberty Resources internal audits established to monitor effectiveness of compliance standards.
- Providing guidance to management, medical/clinical program personnel and individual departments regarding P&P and governmental laws, rules and regulations.

- Updating, periodically, the Compliance Plan as changes occur within Agency, 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 educational and training program.
- Guaranteeing independent contractors (consumer care, vendors, billing services, etc.) are aware of the requirements of Liberty Resources' 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 Structure, Duties and Role of the Compliance Committee

I. Reporting Structure and Purpose

- Compliance Committee (CC) members are appointed by the Chief Executive Officer (CEO).
- Compliance issues are reported by the CC to the CEO and where appropriate, the Board. The CC purpose is to advise and assist the CO with implementation of the Compliance Plan.

II. Function

The roles of the Compliance Committee include:

- Analyzing the environment where Agency does business, including legal requirements with which it must comply.
- Reviewing and assessing existing P&P that address these risk areas for possible incorporation into the CP.
- Working with departments to develop standards and P&P that address specific risk areas and encourage compliance according to legal and ethical requirements.
- Advising and monitoring appropriate departments relative to compliance matters.
- Developing internal systems and controls to carry out compliance standards and policies.· Monitoring internal and external audits to identify potential non-compliant issues.
- Implementing corrective and preventive action plans.
- Developing a process to solicit, evaluate and respond to complaints and problems.

Delegation of Substantial Discretionary Authority

I. Requirement

Any employee or prospective employee who holds, or intends to hold, a position with substantial discretionary authority for Agency is required to disclose any name changes, and



any involvement in non-compliant activities including health care related crimes. In addition, Liberty Resources performs reasonable inquiries into the background of such applicants, contractors, vendors and Members of the Board of Directors. The following organizations may be queried with respect to potential employees, contractors, vendors and Members of the Board of Directors:

a) General services administration: list of parties excluded from federal programs. The URL address is <http://epls.gov/epls/servlet/EPLSearchMain/2>.

b) HHS/OIG cumulative sanction report. The URL address is <http://exclusions.oig.hhs.gov/search.html>.

DSRIP Corporate Compliance Notice

Dear Medicaid Beneficiaries, Advocates, and Others:

Liberty Resources is part of a Performing Provider System (PPS) under New York State's Delivery System Reform Incentive Payment (DSRIP) program. DSRIP focuses on health care system transformation, where providers work to improve and coordinate community based, primary care, mental health and preventive care services. The lead PPS organization in our area is [Central New York Care Collaborative, Inc.](#) (CNYCC).

We participate in certain DSRIP projects in the CNYCC PPS, including, but not limited to, Integrated Delivery Systems, Cardiovascular Disease Management, and more.

If you have any questions, concerns or complaints about these DSRIP projects or the CNYCC PPS, please contact:

- Liberty Resources' Corporate Compliance Officer at 315-425-1004 ext. 1610 via e-mail at compliance@liberty-resources.org or via our compliance hotline at 315-425-1004 ext. 1290
- Or
CNYCC's Compliance Officer at 315-703-2985, or via email at laurel.baum@cnycares.org or via CNYCC's compliance hotline number at 855-343-5598, or online via CNYCC's compliance webpage at <https://cnycares.org/get-involved/corporate-compliance/>.

All reports are treated with respect and may be made anonymously. No one will retaliate against any person making a report in good faith.

Thank you.