

## Corporate Compliance Committee Charter

Purpose: AccessCNY is committed to ethical and legal conduct while providing quality services. This Committee is responsible to collaborate and support the agency's Corporate Compliance Officer, to ensure the written policies and procedures and the required standards of conduct are current, accurate, and complete, and that the required compliance training topics are completed timely.

This Committee serves in an advisory capacity to the Board of Directors as a Committee of AccessCNY ("Agency") to coordinate with the Compliance Officer to ensure the Agency is conducting business in an ethical and responsible manner consistent with the Compliance Plan.

Responsibilities: The Compliance Committee will support the quality of services provided by exercising the following responsibilities:

1. Policies:
  - 1.1. reviewing all Corporate Compliance policies annually;
  - 1.2. drafting support, when requested, for new or revised policies related to compliance; and
  - 1.3. coordinating with the Corporate Compliance Officer to ensure that written policies and procedures, and standards of conduct are current, accurate and complete and that required trainings are timely completed.
2. Corporate Compliance Plan:
  - 2.1. ensuring that the Corporate Compliance Plan is designed and implemented to prevent, detect, and correct non-compliance with Medicaid program requirements, including fraud, waste, and abuse;
  - 2.2. reviewing and ensuring that the Agency has effective systems and processes in place to identify compliance program risks, overpayments, and other issues, and effective policies and procedures for correcting and reporting such issues;
  - 2.3. annually reviewing the Corporate Compliance Plan for completion, efficiency, and regulation compliance; and
  - 2.4. annually reviewing the compliance work plan.
3. Communication:
  - 3.1. coordinating with the Corporate Compliance Officer to ensure communication with and cooperation by affected individuals on compliance related issues, internal or external audits, or any other function or activity required [according to the corporate compliance plan](#);
  - 3.2. advocating for sufficient funding and resources to allow the Corporate Compliance Officer to fully perform his/her responsibilities; and
  - 3.3. collaborating with the Corporate Compliance Officer and reporting compliance issues that arise to the Executive Director and Board of Directors quarterly.
4. Miscellaneous:
  - 4.1. ensuring all levels of the organization, including the Board of Directors, support the compliance program;
  - 4.2. promoting adherence to AccessCNY's legal and ethical obligations;
  - 4.3. identifying and discussing remedial actions to avoid the repeat of incidents;
  - 4.4. discussing disciplinary standards and policies related to Compliance; and

4.5. reviewing this Charter at a minimum, annually.

Accountability: The Compliance Committee shall report directly to and be accountable to the Chief Executive Officer and the Agency Board of Directors (through the Compliance Committee of the Board). The Compliance Committee will designate a member of the Committee to report to the Compliance Committee of the Board; the Compliance Committee designee will support reporting out to the full board by the Chair of the Compliance Committee, as needed.

Composition: Committee members will represent the range of AccessCNY staff and will include the Corporate Compliance Officer. The Chief Executive Officer, Chief Financial Officer, and Chief Operating Officer will attend quarterly Compliance Committee meetings. Staff Members serving on the Committee must be, at a minimum, at the senior manager level, and will come from a variety of Agency work-areas including, but not limited to operations, finance, audit, human resources and discharge planning. The Chief Executive Officer and Corporate Compliance Officer will designate Committee Members and review as necessary.

Slate: No fewer than six and no more than twelve members.

Term of Service: Annually the Committee will designate a Committee Chair, with no term limits for this role. The Committee Chair may be the Corporate Compliance Officer. Annually the Committee will designate a Secretary for note taking, with no term limits.

Non-Intimidation and Non-Retaliation Policy: Compliance is an expectation for all AccessCNY employees, volunteers, intern, students and Board members and AccessCNY encourages everyone to report issues of non-compliance and fraudulent activities without fear of retaliation or intimidation. AccessCNY has developed a Whistleblower Protection policy to prevent intimidation or retaliation for reports made in good faith. If an employee believes that they have experienced retaliation or negative consequences for making a report, filing a complaint, or participating in an investigation, they should contact the Human Resource Director and/or Compliance Officer for further investigation and action.

Meeting Schedule: The committee shall meet quarterly in collaboration with the Compliance Committee of the Board, or more frequently and independently, if needed.

Reviewed and Approved: July 2024