

**Policy and Procedure: Corporate Compliance**  
**Topic: Internal Auditing and Monitoring**

**SCOPE OF POLICY**

This policy applies to all Center for Family Support employees, including trainees, volunteers, consultants, contractors or subcontractors as well as The Board of Directors.

**STATEMENT OF PURPOSE**

The Center for Family Support developed and implemented a corporate compliance program in an effort to establish, in part, effective internal controls that promote adherence to applicable federal, state and local laws and requirements. An important component of the compliance program is the use of internal audits and/or other evaluation techniques to monitor compliance, identify risk areas and assist in the reduction of any or all identified problem areas.

The Center for Family Support recognizes the need for internal controls. This policy focuses the use of CFS' resources to effectively and efficiently audit and monitor risk areas.

**STATEMENT OF POLICY**

The Center for Family Support will conduct ongoing internal auditing and monitoring of identified risk areas related to compliance. Internal audits will assess if adequate and appropriate service delivery documentation exists commensurate with information in consumer service plans and that the documentation exists and is sufficient to support billing claims made by CFS. The Corporate Compliance Officer and the Corporate Compliance Committee in concert with the CFS senior management team will ensure that ongoing auditing and monitoring is properly conducted, documented and reported.

**IMPLEMENTATION OF POLICY**

1. The Corporate Compliance Officer and the CFS Quality Assurance Compliance Team will periodically conduct and facilitate internal auditing and monitoring of all programs and the identified risk areas related to compliance with laws and regulations, as well as The Center for Family Support policies, procedures, and standards of conduct. Risk areas may be identified through the regular course of business, external alerts, or internal reporting channels.

2. The Corporate Compliance Officer will conduct and/or oversee compliance reviews with assistance from management staff and quality assurance staff with the requisite skills to carry out the audit.
3. The internal audits and reviews conducted will examine The Center for Family Support's compliance with specific rules and policies through on-site visits, personnel interviews, clinical record reviews to support claims for reimbursement, documentation reviews of billable services and compare to billing summaries and billing claims.
4. The Corporate Compliance Officer will determine the sample size and sample criteria prior to each internal audit. All review tools used will be standardized throughout The Center for Family Support and designed by the Corporate Compliance Officer. All audit tools will be revised as warranted to be consistent with all current laws and regulations and any revisions of such.
5. The Corporate Compliance Officer will facilitate all audits of operational and programmatic issues with Department Directors. The audits will serve to evaluate, at minimum, the following:
  - Compliance with laws, regulations, and related policies and procedures.
  - Fraud and abuse issues;
  - Service delivery and documentation practices;
  - Conflict of Interest;
  - Employee, independent contractor, and Board compliance training and education.
6. The CFS Executive Director will identify an independent, external auditor or group of auditors with applicable and sufficient experience and expertise to conduct and facilitate audits of financial processes or systems. The audits will serve to ensure that internal controls are in place so that:
  - Generally Accepted Accounting Principles (GAAP) are followed; and
  - Federal, state, and local laws, regulations, and requirements are met.
  - Appropriate third party billing practices are in effect.

Upon completion of the audit, the Corporate Compliance Officer will review the findings and assist in the design of any corrective measures arising from them.

7. Upon completion of the internal audit, the Corporate Compliance Officer will provide a written report of the findings and assist in the design of any corrective measures arising from them. Written reports will be submitted within three weeks of the audit to CFS Executive staff, CFS Controller and Director of Finance, applicable Department Directors and Management personnel.

8. A plan of corrective action is to be submitted to the Corporate Compliance Officer within three weeks of receipt of the findings report by the applicable department head in concert with finance personnel.
9. The Corporate Compliance Officer and/or quality assurance personnel will validate and check on implementation of any/all corrective measures through follow-up reviews.
10. In addition, the residential habilitation compliance specialist will review all residential habilitation checklists (service delivery document for residential services) and compare these checklists to the staff work schedules for each residence. This comparison of time worked with service delivery records will be done for each service recipient in residential services, minimally on a weekly basis. Any discrepancies will be brought to the attention of the program administrators for resolution. Any possible fraud will be reported to the Corporate Compliance Officer and the Director of Human Resources for further investigation and resolution.
11. For community services, the Program Assistant as well as program supervisors make "cold calls" to service recipient's residences. Cold calls are those unannounced calls made to service recipient homes and or the employee cell or service recipient's cell phones (for those services all in the community) at times that the assigned employee has been scheduled to work with that service recipient. Calls are made for each service recipient/service minimally once per quarter. The caller asks to speak with the service recipient and/or their family to verify staff's time and attendance. This is done to ensure that staff are working as assigned and is compared to the service delivery documents and time and attendance records. Any discrepancies are reported to the program Director. Any possible fraud is reported to the Corporate Compliance Officer and the Director of Human Resources for further investigation and resolution.
12. The Corporate Compliance Officer will be responsible to periodically report to the Executive Director and the Corporate Compliance Committee on the general status of compliance reviews, the outcome of compliance auditing and monitoring, and the corrective actions taken.
13. On an annual basis, the Corporate Compliance Officer will monitor the effectiveness of the Corporate Compliance Plan and will update compliance policies and procedures, as necessary, to comply with regulatory changes or industry trends.