

Standard:

AccessCNY will ensure that all Corporate Compliance complaints are addressed in a thorough and timely manner. Corporate Compliance complaints may include, but are not limited to the following:

- submitting or signing a report or billing for service not rendered
- falsifying or altering documentation
- omitting required documentation or failing to timely complete required documentation
- misappropriation of agency or participant funds
- illegal actions/activities
- billing for providing more than one service at a time (could be both through AccessCNY or another agency)

To the greatest extent possible, an investigation of Corporate Compliance issues will remain confidential, although the nature of some investigations makes certain disclosures unavoidable.

Procedure:

1. All complaints will be reported to any supervisor or to the Associate Executive Director of Quality and Performance who is AccessCNY's Compliance Officer. The complaint can be reported verbally, in written form or through the Hot Line. AccessCNY's Compliance Hot Line number is **(315)410-3333**. Complaints may be reported anonymously. If a report is made by an employee to a supervisor, the supervisor receiving the complaint will report the complaint to the Compliance Officer. In the event the complaint is against the Compliance Officer, the Chief Executive Officer will be notified.
2. The Compliance Officer will check the Hot Line number on a daily basis. The Compliance Officer will assign a designated person to receive complaints and check the Hot Line in the event that the Compliance Officer will be away from the office for more than two business days.
3. All the compliance complaints received will be documented with the action taken by the Compliance Officer on the compliance tracking sheet.
4. Upon receipt of a complaint, the Compliance Officer will determine whether the complaint warrants an investigation. A full investigation (to include a written report) will be completed for all concerns of potential intentional fraud, waste or abuse. If the concern reported is clear that it's due to an unintentional error, the Compliance Officer will discuss appropriate follow-up with appropriate management staff and Human Resources as applicable. If the complaint does not warrant an investigation or is not related to Corporate Compliance, the Compliance Officer will forward the complaint to the appropriate management staff or Associate Executive Director of Human Resources. In the event that an investigator is not available, the

Compliance Officer will conduct the investigation. This information will be tracked on the compliance tracking sheet maintained by the quality enhancement department.

5. For any issues requiring a full investigation, the Compliance Officer will notify the Executive Director, Chief Operating Officer, Associate Executive Director, Associate Director, General Counsel and the Program Director of the involved program, Associate Executive Director of HR and Chief Financial Officer, if applicable.
6. In the event that it is determined that the employee involved should be suspended during the investigation as determined by the investigator, program designee and/or an HR representative, the Program Director or designee who oversees the employee will notify the employee. If the concern involves another affected individual, a decision will be made as to the appropriate safeguards which may be include but not limited to suspension, additional training, etc.
7. If a full investigation is warranted, the assigned investigator will initiate an investigation within two business days of receipt of the complaint.
8. The investigator will conduct interviews, review documentation and complete a written investigation report with findings, conclusion and recommendations.
9. The Compliance Officer will review the investigation report and forward the conclusion and recommendations to the Executive Director, the Associate Executive Director, General Counsel, the Associate Director and Program Director and Associate Executive Director of HR within ten business days of the complaint. If the investigator requires more time, the Corporate Compliance Officer will forward the status of the investigation to the Executive Director, Chief Operating Officer and Associate Executive Director of HR.
10. If disciplinary action is recommended, the investigator will schedule a meeting with the Compliance Officer, Associate Director, Program Director and a representative from Human Resources to discuss the findings. Program staff and Human Resources will decide on disciplinary follow-up. The Compliance Officer may also weigh in if necessary. If it is determined that no infraction occurred and that the complaint was not reported in good faith, but was done with malice, follow-up will occur with the employee and disciplinary action may be taken against the person filing the initial complaint. General Counsel will be consulted as deemed necessary.
11. The Program Director will forward results of actions taken by the agency regarding the complaint to the Compliance Officer within 30 days of receipt of the written report. Actions may include disciplinary action and/or termination of the employee involved, re-training, police involvement or self-disclosure to outside overseeing agencies.
12. If requested by the initiating person, the Compliance Officer will respond to the person initiating the complaint (if disclosed) within 15 business days regarding the activities in process. (The details or findings of the investigation will not be disclosed to the complainant).
13. The Compliance Officer will ensure that all documents, complaints and investigations are

kept secure for 10 years. All documentation is stored electronically and securely on SharePoint.

14. The Compliance Officer will review the investigation and actions taken by the agency with the Compliance Committee on a quarterly basis. Any additional recommendations made by the Committee will be forwarded to the applicable management staff.
15. The Compliance Officer will submit a quarterly written report to the Compliance Committee of the Board regarding Corporate Compliance complaints and investigations. Agency trends will also be shared on an annual basis with the Board of Directors.