

## Corporate Compliance

Internal Audits August 2024

## Standard:

AccessCNY will implement a system of internal audits to ensure that services are provided and billed in compliance with applicable laws and regulations.

## Procedure:

- 1. The Director of Quality Enhancement or designee will determine how often each program will be audited annually based on the results of the annual risk assessment. This information will be shared with and approved by the Corporate Compliance Committee.
- 2. The Quality Enhancement department will develop and update audit tools for each department according to current regulations and protocols to ensure quality and consistency.
- 3. The Quality Enhancement auditor will select a random sample on the day of the scheduled audit. Before reviewing any participant record, the Quality Enhancement auditor will sign the record access log if it is required by the department.
- 4. The Quality Enhancement auditor will provide feedback to the Manager or Program staff present throughout the audit.
- 5. Upon completion of the audit, the Director of Quality Enhancement or designee will prepare an audit summary including positive and negative findings. Within one month of the completion of the audit, the audit summary will be forwarded through SharePoint to the Associate Executive Director, Program Director, Program Manager and Chief Financial Officer (if appropriate). The Program Director and Program Manager will also receive access to each individually completed audit tool.
- 6. The Program Director will document corrections to issues and any monitoring system on the audit summary in SharePoint within 30 days of receipt. Associate Executive Director of Quality and Performance can access the responses in SharePoint.
- 7. The written audit summary, completed audit tools and response form will be kept on file with the Quality Enhancement Department.

- 8. Each department will also develop an additional auditing process within the department which may include peer audits. The results will be shared with the Quality Enhancement Director who will track issues and trends on a spreadsheet and forward to the Associate Executive Director of Quality and Performance.
- 9. The Associate Executive Director of Quality and Performance will review audit trends and results with the Corporate Compliance Committee on a quarterly basis.
- 10. The Associate Executive Director of Quality and Performance will submit an annual report to the Board of Directors on audit trends as well as department improvements.