



CORAS

Wellness & Behavioral Health

Corporate Compliance Plan

I. Introduction

MISSION

CORAS = Championing Optimal Recovery Advancing Self-Sufficiency. CORAS Wellness & Behavioral Health provides a nurturing, caring, and safe environment for individuals in Delaware seeking MAT, Substance Abuse Treatment and Family Planning services.

CORAS Wellness and Behavioral Health {CORAS} is dedicated and committed to meeting high ethical standards and compliance with all applicable laws in all activities regarding the delivery of services. CORAS adopted this Corporate Compliance Plan to comply with the provisions of the Office of Inspector General of the Department of Health and Human Services. This Policy describes our procedures for detecting and preventing fraud, waste, and abuse.

As is detailed within this Corporate Compliance Plan, it is the duty of all of our employees, contractors, vendors and agents to comply with the policies as applicable to their individual areas of employment or contracts and program service requirements.

This Corporate Compliance Plan also advises all of our employees, contractors, vendors and agents of the procedures to be used in reporting non-compliance with such Federal and State laws.

An effective compliance program helps identify and prevent illegal and unethical conduct and demonstrate CORAS' commitment to honest and responsible corporate conduct. The primary purpose of this plan is to improve quality, efficiency, effectiveness of consumer care and operational activities. This plan shall help to organize our resources to resolve payment discrepancies and detect inaccurate billings as quickly and efficiently as possible, and to impose systemic checks and balances to prevent future recurrences of any such findings.

A. Benefits of our Compliance Program

Benefits of our Compliance Program include, but are not limited to the following:

1. Demonstrates to the employees and community at large our strong commitment to honesty, responsibility and appropriate ethical conduct.
2. Develops a system to encourage employees to report potential problems that may be detrimental to the consumer and CORAS.
3. Develops procedures that allow for a thorough investigation of alleged misconduct.

4. Develops procedures for promptly and effectively conducting internal monitoring and auditing which may prevent non-compliance.
5. Through early detection and reporting, minimizes the risk of civil damages or penalties, and criminal sanctions.

B. CORAS is committed to the following standards:

1. Ethical and Legal Practices
2. Honest and Responsible Professional Conduct
3. Improving Quality, Efficiency, and Effectiveness of Consumer Care and Operational Activities
4. Reporting Fraud, Waste, Abuse or Unethical Practices
5. Investigating Suspected or Actual Instances of Fraud, Waste, Abuse or Unethical Practices

C. Definitions

Fraud- An intentional deception or misrepresentation made by a person with the knowledge that the deception could result in some unauthorized benefit to themselves or some other person. Fraud includes any act that constitutes fraud under applicable Federal or State law. Knowingly or intentionally submitting false claims is an act of fraud.

Examples

- To purposely bill for services that were never provided.
- To bill for a service that has a higher reimbursement than the service rendered.
- Rounding up of time.
- Duplicate billing, which occurs when a provider bills Medicaid and also bills private insurance and/or the recipient.
- Having an unlicensed person perform services that only a licensed professional should render, and bills as if the professional provided the service.
- Billing for an office visit when there was none, or adding additional family members' names to bills.

Waste- The overutilization of services or other practices that result in unnecessary costs.

Examples

- Provider ordering excessive testing.
- Recipient using excessive services such as office visits.
- Provider utilizing supplies excessively or irresponsibly.
- Referring the recipient for more office visits when another appointment is not necessary.

Abuse- Provider practices that are inconsistent with sound fiscal, business, or medical practices, and result in an unnecessary cost to the Federal / State program, or in reimbursement for services that are not medically necessary or that fail to meet professionally recognized standards for health care. Abuse also includes recipient practices that result in unnecessary cost to the Federal program.

Examples

- Services that are billed by mistake
- Misusing codes - code on claim does not comply with national or local coding guidelines; not billed as rendered
- Billing for non-covered services
- Inappropriately allocating costs on a cost report
- Duplicate billing, which occurs when a provider bills Medicaid and also bills private insurance and/or the recipient.

II. Corporate Compliance Code of Conduct

In addition to the general policies and procedures as found in documents such as the CORAS Policies and Procedures and Apis Services Employee Handbook, the following *Corporate Compliance Code of Conduct* is addressed specifically for the guidance of CORAS staff. The *Code of Conduct* is given to all new hires and included in new hire training. The statements included in the *Code of Conduct* are not intended to prescribe a specific response to every conceivable situation, but they are intended to assist staff in determining an appropriate response as situations arise. Whenever an employee has a question about an appropriate response in a given situation, they should consult their immediate supervisor.

1. CORAS will bill only for services actually rendered and shall seek the amount to which it is entitled. Although Apis Services may handle billing, it is the responsibility of CORAS to ensure that services were rendered as indicated and that documentation is present that substantiates the claim.
2. CORAS does not tolerate billing practices that misrepresent the services actually rendered.
3. Supporting documentation must be prepared for all services rendered, as appropriate, by CORAS.
4. All services must be accurately and completely coded and submitted to the appropriate payer in accordance with applicable regulations, laws, contracts and CORAS Policies and Procedures.
5. All services must be provided by a person with the credentials required by applicable regulations and/or contracts. CORAS is responsible to ensure compliance.

6. An accurate and timely billing and documentation process is critical to ensure that CORAS and/or Apis Services staff can effectively implement and comply with required policies and procedures.
7. When billing or documentation errors are identified, the documentation and billing systems must be examined to identify any flaws, which must be remedied in a timely manner at the program level with input from the Inperium Office of Policy and Legal Counsel, as appropriate.
8. CORAS staff are not to falsify documentation for the purposes of billing.
9. CORAS is responsible for verification of service provision by referring to clinical and medical records for documentation.
10. CORAS staff are not to use white-out in paper clinical or medical records, or erase any official documentation – always cross off; initial and then re-write. All changes to records in EHR’s are logged as part of a HIPAA Log or similarly labeled record.
11. CORAS staff are responsible for maintaining confidentiality of all consumer and employee protected health information (PHI).
12. CORAS staff may only access confidential information for authorized purposes directly related to their scope of work.

III. Corporate Compliance Officer

The CORAS Board of Directors and Executive Leadership has tasked the Corporate Compliance Officer as responsible for overseeing the development and implementation of the Corporate Compliance Program and ensuring the appropriate handling of instances of suspected or known illegal or unethical conduct. **We have identified the Chief Compliance, Training and Quality Officer as our Compliance Officer.**

Name	Title	Email Address	Phone Number
Stefan Zonia	Chief Compliance, Training, & Quality Officer / CORAS Corporate Compliance Officer	szenia@coraswellness.org	215-808-7064

The CORAS Corporate Compliance Officer must report any/all substantial concerns related to suspected or known illegal or unethical conduct to the Apis Services Corporate Compliance Officer within two business days of learning of the matter.

A. Duties of the CORAS Corporate Compliance Officer

- Oversee and monitor the implementation of the Compliance Program;
- Maintain the effectiveness of the Compliance Program;
- Establish methods such as conducting periodic audits, developing effective lines of communication on compliance issues and preparing written standards and procedures that reduce the organization’s vulnerability to fraud and abuse;

- Periodically revise the Program in light of changes in the needs of the organization, in the law, policies, and procedures of the government;
- Develop, coordinate and participate in a training program that focuses on the components of the Compliance Program and seeks to ensure that all appropriate employees and management are knowledgeable of, and comply with, pertinent federal and state standards; and that independent contractors, consultants and volunteers who furnish health services to our consumers are aware of the requirements of the Compliance Program.
- Ensure that the List of the Excluded Individuals and Entities have been checked with respect to all employees, medical staff, contractors, and members of the Board of Directors.
- Report on a regular basis to Executive Leadership, the Board of Directors, and Apis Services, Inc. Compliance Officer on the progress of implementation, any investigations and corrective action.

IV. Communication and Changes in Compliance Manual

Any modifications of, or amendments to, this Compliance Plan will be distributed in writing (electronically through our secure server or posting on our website) to all employees, contractors, vendors, and agents of CORAS, as applicable and appropriate. If the Compliance Officer determines that written distribution is insufficient, in-service trainings will also be conducted (please refer to section on Education and Training below). The plan will be reviewed at least annually and updated as necessary.

V. Education and Training

The proper education and training of employees is a significant element of an effective compliance program. As such, staff will be expected to participate in appropriate training.

A. Corporate Compliance Plan

- All current employees will be provided a copy of the Corporate Compliance Plan. Each individual will be expected to sign a training record indicating that they have read and understood the Plan. All staff are expected to annually certify receipt and review of the Plan.
- For new employees, the Corporate Compliance Plan will be provided during the orientation process and an educational session will occur at that time. All new employees will be expected to sign a training record stating that they understand and will comply with the Plan.
- For vendors, consultants, contractors and other agents the Compliance Plan and any updates will be on the CORAS website (coraswellness.org). All vendors and

contractors who what to do business with CORAS are expected to comply with all elements of the Corporate Compliance Plan.

B. Federal and State False Claims Act and Whistleblower Protection

All CORAS employees will be annually trained on, and/or provided with any relevant updates to, the Federal False Claims Act and Whistleblower Protection.

The Human Resources Department will maintain a database that shows all employees who have completed training for the year. If any staff member is non-compliant, the supervisor will be informed and further non-compliance may result in disciplinary action.

C. Health Insurance Portability and Accountability Act (HIPAA)

All CORAS staff will be annually trained on HIPAA and confidentiality. All employees are expected to review, understand, and abide by our HIPAA Policy.

CORAS will maintain a database that shows all employees who have completed training. If any staff member is non-compliant, the supervisor will be informed and further non-compliance may result in disciplinary action.

VI. Reporting Requirements

CORAS believes that it is our employees who best know where/when organizational policy or regulation is not being followed. Therefore, the effectiveness of our Compliance Program depends on the willingness of employees in all parts and at all levels of our organization to step forward, in good faith, with questions and concerns.

CORAS strongly believes that in all of these cases, resolution of the problem behaviors or actions will result in better care for our consumers. Therefore, each person reporting problems or concerns will be contributing positively to the overall quality of services provided across our organization.

If there is suspicion of possible fraud, waste and/or abuse or other matter related to the Compliance Program, it is the responsibility of the staff who suspects such action to inform a person in senior level authority who they feel may assist in directing the issue/concern to resolution. CORAS expects that the first person informed be our Corporate Compliance Officer; however, additional means of reporting are provided. (See procedures for reporting possible non-compliance below).

All reports of possible fraud, waste and abuse, or other matters related to Medicaid or Medicare compliance must be reported to the Corporate Compliance Officer who will implement the necessary steps as set forth in the Compliance Program for investigating the matter. As part of the investigation, the Corporate Compliance Officer will maintain a compliance investigation log.

A. Policy

1. Every employee is responsible for doing their job in a manner that is ethical and complies with the laws and regulations that govern our work.
2. Every employee is responsible for seeking supervisory assistance if they have doubts or are unclear about what the right action is to stay compliant. If the employee does not believe their supervisor is correct in their advice, they can go to the CEO and/or Corporate Compliance Officer with the question or concern and they will investigate and answer the question or concern.
3. Every employee has a duty to CORAS and to our consumers to report actions or behaviors they feel violate the code of conduct, procedure, law or regulation. Any employee that fails to report misconduct or illegal behavior may be subject to disciplinary procedures up to and including termination.
4. CORAS encourages employee reporting and investigates all reports to determine the extent of the problem and corrective action(s) needed.
5. CORAS is committed to ensuring that employees who do report:
 - Do not suffer any retaliation by their peers or supervisors for their good faith reports or questions.

- Have the choice of keeping their name confidential in regard to a specific report for as long as the organization can reasonably do so.
- Have an agreed upon method for determining the status of their report and any subsequent investigation where possible.

B. Procedures

HOW TO REPORT

Employees may report at any time to:

1. **CORPORATE COMPLIANCE OFFICER:** Directly to the Corporate Compliance Officer, Stefan Zonia, via email at szonia@coraswellness.org or by calling 215-808-7064. This line will be answered only by the Corporate Compliance Officer.
2. **VOICE MAIL OR FACE-TO-FACE REPORTS:** Voice mail or face-to-face reports to the Corporate Compliance Officer or ANY senior manager or supervisor.
3. **MAIL AND EMAIL:** Employees may use mail or email to report problems or concerns. Mail and email can be directed to the Compliance Officer or to ANY senior manager or supervisor.

compliance@coraswellness.org

**CORAS Wellness and Behavioral Health
590 Naamans Rd
Claymont, DE 19703**

In ALL cases, the CORAS Corporate Compliance Officer will be given information regarding possible non-compliance.

In ALL cases *except* where the Corporate Compliance Officer is the subject of the complaint, supervisors who get employee reports are required to discuss the report with the Corporate Compliance Officer. If the Compliance Officer is the subject of the complaint, supervisors are required to discuss the report directly with the CEO.

VII. Enforcement and Discipline

If as the result of an investigation or through monitoring and auditing it is determined that fraud, waste and/or abuse has occurred, or that a staff person or program is in violation of policies and procedures set forth in the Compliance Plan, corrective actions may be identified that may include disciplinary action.

A. Discipline Policy and Actions

All employees are expected to report any breaches of laws, regulations, policies and standards that govern our work as well as the organization's Code of Conduct. Upon receipt of such reports, the matter will be investigated by the Corporate Compliance Officer. Additionally, CORAS, through its ongoing monitoring, may determine a breach may have occurred. In either instance, where a breach is confirmed, appropriate actions will be taken by CORAS.

In order to correct or improve employee performance, Apis Services, Inc. and CORAS encourage employee counseling as an initial step. However, there may be times where more severe action is appropriate. In these cases, formal disciplinary actions will range from verbal warnings to termination. When disciplinary action other than a verbal warning is proposed, the Human Resource Office will be contacted and they will coordinate such action.

The results of an investigation may also lead, but is not limited to, the following:

- Revision of the Compliance Plan to prevent the reoccurrence of misconduct in the area;
- Increasing review and monitoring procedures;
- Retraining employees and contracted professionals;
- Modification of the charges, coding, and billing system(s) where necessary; and/or
- Adjustment to policies and procedures.

B. Non-Retaliation Policy

To the extent possible, all employee reports will be handled in a manner that protects the confidentiality of the reporter if they request it. However, there may be circumstances in which confidentiality cannot be maintained. Examples include situations where the problem is known to only a very few people or situations in which the government or one of our other payers or funders must be involved. In most cases, they will require the name of the individual who first brought the problem to the attention of the organization. In all cases, CORAS is determined that the reporting employee will not suffer from any retaliation for their good faith actions. It is the responsibility of the Corporate Compliance Officer to ensure that those reporting in good faith do not suffer any retaliation for doing so.

C. List of Excluded Individuals or Entities

As an organization who is funded, in part, by Federal dollars, CORAS may not make payments for any items or services which are furnished by an excluded individual or entity or directed or prescribed by an excluded provider. Payment prohibition extends to payment for administrative and management services not directly related to consumer

care and coverage of an excluded individual's salary, expense or fringe benefits. Persons and entities who are listed on the Federal OIG Exclusion Database must receive reinstatement through the OIG to be eligible for reimbursement through Federal dollars.

CORAS and Apis Services, Inc. has implemented the following policy:

1. Apis Services, Inc. has contracted with PreCheck to complete monthly screenings to search for excluded individuals and entities.
 - a. The Apis Services, Inc. departments tasked with ensuring screenings take place as required are noted below.
 - i. The Human Services department utilizes payroll information to screen employees using PreCheck.
 - ii. For any new contractors, consultants, and vendors, the Fiscal Department screens relevant parties using PreCheck prior to the initiation of services provided and monthly thereafter.
 - iii. The names of all members of the Board of Directors will be provided to Human Resources Department by the Board Secretary for inclusion on the list to be screened. Any relevant changes to this list of individuals will be reported in a timely manner.
 - b. PreCheck provides sanction screening of submitted names through a partnership with the National Healthcare Data Bank (NHDB).
 - i. The monthly check includes screening names against the Office of Inspector General (OIG), General Services Administration (GSA), List of Excluded Individuals and Entities (LEIE), and all State Medicaid Agencies.
 - ii. PreCheck provides a monthly report of its findings and a certificate providing the date of the screening completion.
 - c. Those screened include, but are not limited to, all employees, vendors, contractors, service providers, and members of the Board of Directors.
 - d. If an excluded individual or entity is discovered, Human Resources will immediately notify the CORAS CEO and Corporate Compliance Officer who will immediately self-report the findings to the required and applicable State body.
 - i. A corrective action plan shall be submitted to the applicable State body and will include the following:
 1. Data Analysis – root cause, what, when
 2. Program Analysis – identify operational procedures that contributed to the error
 3. Plan of Correction – how the error will be corrected, moving forward
 4. Implementation – specific timeframe of implementation
 5. Evaluate/Monitor – plan to monitor moving forward

VIII. Monitoring and Auditing

CORAS monitoring and auditing procedures are designed to uncover activities that could potentially constitute violations of the Corporate Compliance Plan or failure to comply with federal and state law or other types of misconduct. We understand our obligation to investigate any incidents uncovered to determine:

- That a violation has, in fact, occurred;
- That disciplinary action must be taken; and
- Corrective actions are put into place as required.

All issues reported to the Corporate Compliance Officer will be handled in a consistent manner so that the integrity of the Plan is maintained, and so employees will have confidence in the workings of compliance investigations.

CORAS has a management hierarchy that is designed to properly address employee misconduct through the normal avenues of supervision. Most day-to-day issues should be handled through this hierarchy.

As part of our effort to implement an effective Compliance Program, CORAS will periodically conduct routine self-audits of its operations including its billing practices, its written standards, policies and procedures to ascertain problems and weaknesses in its operations and to measure the effectiveness of its Compliance Program. All personnel are expected to fully cooperate with any such monitoring activities.

IX. Response and Prevention

The goal of the CORAS Compliance Program is to prevent and reduce the likelihood of improper conduct. The CORAS response to information concerning possible violations of law or the requirements of the Compliance Program is an essential component of its commitment to compliance.

A. Investigations

Upon receiving a report or other reasonable indication of suspected non-compliance, the Corporate Compliance Officer will initiate prompt steps to investigate the conduct in question and determine whether a material violation of applicable law or the requirements of the Program has occurred. An investigation will be conducted with one or several of the following:

- In conjunction with CORAS Senior Staff, Performance Improvement/Compliance Department, Apis Services, Inc. billing/fiscal staff, and/or other appropriate staff who may have information about what might have occurred;
- Interviewing of individuals with potential knowledge of the matter;
- Review of the relevant documents;
- Engaging legal counsel, outside auditors or other experts to assist in the investigation.

Upon receipt of information concerning alleged misconduct, the Corporate Compliance Officer will, at a minimum, take the following actions:

1. Complete a Compliance Report Form
2. Notify the CORAS CEO, Inperium Delaware CEO, and Apis Services Corporate Compliance Officer.
3. Ensure that the investigation is initiated as soon as reasonably possible but, in any event, not more than three business days following receipt of the information. The investigation shall include, as applicable, but need not be limited to:
 - a. Interviews of all persons who may have knowledge of the alleged conduct and a review of the applicable laws, regulations and standards to determine whether or not a violation has occurred.
 - b. Identification and review of relevant documentation including, where applicable, representative bills or claims submitted to Medicaid/Medicare, to determine the specific nature and scope of the violation and its frequency, duration and potential financial magnitude.
 - c. Interviews of persons who appear to play a role in the suspected activity or conduct. The purpose of the interviews is to determine the facts surrounding the conduct, and may include, but shall not be limited to:
 - The person's understanding of the applicable laws, rules and standards;
 - Identification of relevant supervisors or managers;
 - Training that the person received;
 - The extent to which the person may have acted knowingly or with reckless disregard or intentional indifference of applicable laws.
 - d. Preparation of a summary report that (1) defines the nature of the alleged misconduct, (2) summarizes the investigation process, (3) identifies any person who is believed to have acted deliberately or with reckless disregard or intentional indifference of applicable laws, (4) assesses the nature and extent of potential civil or canal liability and (5) where applicable, estimates the extent of any resulting overpayment by the government.
4. Establish a due date for summary report or otherwise ensure that the investigation is completed in a reasonable and timely fashion and the appropriate disciplinary or corrective action is taken if warranted.

5. Notify the complainant, if identity is known, that the investigation has been concluded and any necessary follow up is being addressed.

B. Corrective Action Plans and Implementation Reviews

Investigations

In the event the investigation identifies employee misconduct or suspected criminal activity, CORAS and Apis Services, Inc. (if applicable) will undertake the following steps:

1. Immediately cease the offending practice. If the conduct involves the improper submission of claims for payment, we will immediately cease all billing potentially affected by the offending practice.
2. Consult with legal counsel to determine whether voluntary reporting of the identified misconduct to the appropriate governmental authority is warranted.
3. If applicable, calculate and repay any duplicate or improper payments made by a federal or state government program as a result of the misconduct.
4. When appropriate, handle any over payments through the administrative billing process by informing the billing staff and making appropriate adjustment via software used for billing.
5. We will initiate disciplinary action as noted in 'Section VII – Enforcement and Discipline' of this Compliance Plan.
6. Promptly undertake appropriate training and education to prevent a recurrent of the misconduct.
7. Conduct a review of applicable Policies and Procedures to determine whether revisions or the development of new policies and/or procedures are needed to minimize future risk of noncompliance.
8. Conduct, as appropriate, follow-up monitoring and audit to ensure effective resolution of the offending practice.

X. Legal Counsel

Legal counsel is available to assist the Corporate Compliance Officer; CORAS CEO; and Board of Directors, as needed, to identify and interpret federal and state laws and regulations in the Compliance Plan.

Legal counsel may be notified at the discretion of the CORAS CEO of incidents that have a reasonable cause to support the assertion of non-compliance at which time the Corporate Compliance Officer will be responsible for facilitating an investigation. The results of the investigation will be used by legal counsel to provide legal advice to the Corporate Compliance Officer and CORAS CEO.

XI. Conclusion

This Compliance Plan has been prepared to outline the broad principles of legal and ethical business conduct embraced by CORAS. It is not a complete list of legal or ethical questions you might face in the course of business. Therefore, this plan must be used together with your common sense and good judgment.

If you are in doubt or have a specific question, you should contact your supervisor or the CORAS Corporate Compliance Officer.