



Cortland County Community Action Program, Inc.
Consumer Directed Personal Assistance Program

2024 Annual Compliance Workplan

Cortland County Community Action Program, Inc (CAPCO) is committed to providing services of the highest quality and to being in full compliance with all federal, state, and local laws and regulations. As part of that commitment, CAPCO has adopted a compliance plan and Standards of Conduct as the basis of its efforts in fostering an organizational culture that promotes responsible and honest conduct, transparency in all business transactions, and adherence to the laws and regulations of the government oversight agencies and founders.

Agency Compliance Officer: Kirsten Parker, Deputy Director

Compliance Committee: Kirsten Parker, Deputy Director; Greg Richards, Executive Director; Finance Director (currently vacant); Lisa Stack, Transactional Accountant; Grace Overbaugh, Medicaid Billing Specialist; Merwin Greene, CDS Coordinator; Danielle Treacy, Human Resources Coordinator; Pat Poch, CDS Assistant/Medicaid Transportation Coordinator.

1.0 Compliance Plan

- 1.01 Selection of billing cycle for audit-We will review the billing for 33% (minimum of 5 records) for one MLTC per quarter. The schedule is as follows:
 - February-audit records for 1/13/2024-1/26/2024 for straight Medicaid consumers. Audit will be completed by March 1, 2024, for review at March meeting.
 - May-audit records for 5/4/2024-5/17/2024 for ICircle consumers. Audit will be completed by June 1st for Review at June Meeting.
 - August-audit records for 7/13/24-7/26/24 for Nascentia consumers. Audit will be completed by August 1st for review at September meeting.
 - November-audit records for 10/5/-24-10/18/24 for Fidelis consumers. Audit will be completed by December 1st for review at December meeting.
- 1.02 Policy Review Selection-We will review a minimum of one policy at each quarterly meeting of the compliance committee. The schedule is as follows:
 - March-Review of Standards of Conduct Policy
 - June-Review of Anti-kickback Policy (with appendix)
 - September-Review of Auditing and Monitoring Policy
 - December-Review of Billing Errors, Overpayments and Self-Disclosure (with appendix)
- 1.03 Training and Development Plan-Board, Consumers, Personal Assistants and relevant CAPCO staff will be trained in March 2024 using training based on training provided by the Bonadio group.

2.0 Policies and Procedures and Standards of Conduct-policies and procedures and Standards of Conduct will be reviewed by the committee per the schedule listed in 1.02 above.

4.0 Compliance Education and Training-

- 4.01 Annual Training for the Board of Directors will be conducted in March 2024
- 4.02 Staff Annual Compliance Training-will be conducted at hire and in March 2024

- 4.03 Personal Assistant Annual Compliance Training will be conducted in March 2024
- 4.04 Consumer Annual Compliance Training will be conducted in March 2024

5.0 Confidential Communication Review

5.01 The Compliance Officer will review confidential communication with the compliance committee and the Board as appropriate, at regularly scheduled meetings.

6.0 The Compliance Officer will review Discipline and Enforcement of Compliance Standards with the compliance committee and the Board of Directors, as appropriate, at regularly scheduled meetings.

7.0 Auditing and Monitoring-The Compliance Committee will review the results of audits as scheduled in section 1.01. The Compliance Officer will then report the results of the quarterly audits to the Board of Directors at regularly scheduled meetings.

8.0 Response to Compliance Issues-The Compliance Committee will formulate responses to compliance issues discovered in compliance audits at quarterly compliance meetings. Issues requiring discipline will be handled by the Deputy Director, Executive Director, and HR Coordinator. All responses will be shared with the Board of Directors by the Compliance Officer.

If you have any questions about the 2024 Compliance Work Plan, please contact the Compliance Officer-Kirsten Parker at 607-753-6781, kirstenp@capco.org.