

CORPORATE COMPLIANCE PLAN-Condensed

OVERVIEW

The L.A.D.D., Inc. Corporate Compliance Plan (simply referred to as the CCP) establishes standards and policies that clearly communicate appropriate ethical and legal behavior to help prevent fraud, abuse and other unethical practices; and to ensure all employees are striving to meet the highest standards of ethical conduct. The CCP also exists to provide a process for the people we serve, guardians, employees, personnel from other agencies, and community members to discuss or file complaints, grievances, violations, or problems with this organization or its employees, including Management, and to receive careful consideration and a prompt resolution.

L.A.D.D., Inc. standards for excellence are based on honesty, integrity, fairness, respect, trust, responsibility, and accountability in operations, governance, human resources, financial management, community supports and fundraising.

The CCP is based on the seven fundamental elements of an effective compliance program. In order to organize and simplify the CCP each element represents a section as follows;

SECTION I. Designating a corporate compliance officer and compliance committee.

SECTION II. Implementing written policies, procedures and standards of conduct.

SECTION III. Conducting effective training and education.

SECTION IV. Developing effective lines of communication.

SECTION V. Conducting internal monitoring and auditing.

SECTION VI. Enforcing standards through well-publicized disciplinary guidelines.

SECTION VII. Responding promptly to detected offenses and undertaking corrective action.

SECTION I - Designating a Compliance Officer and a Compliance Committee

LADD maintains a robust reporting mechanism for compliance issues and strives to make the CCO and Committee members easily accessible to all stakeholders. Contact information for questions or filing a complaint is available;

- On the LADD Website
- Available in all Programs
- Included in online training initial and annually
- Included in the Service Information Packets

SECTION II – Implementing Policies, Procedures and Standards of Conduct

L.A.D.D., Inc. Employee Code of Conduct Handbook, the L.A.D.D., Inc. Directory and Management Manual contain several policies and procedures that provide standards and guidance for business operations.

HIPAA SECURITY AND SAFEGUARD POLICY - It is the policy of L.A.D.D., Inc. to protect the privacy and confidentiality of protected health information for the people we support and the employees of L.A.D.D., Inc. The following safeguards/security measures have been implemented to ensure this privacy protection.

CELL PHONE POLICY - Cell phones must not be used to take pictures of the people supported or otherwise capture any information relative to the person or the organization. Cell phone use by an employee on shift may never interfere with the support a person receives.

SOCIAL MEDIA POLICY - Provides guidance to employees in the use of Social Media relative to the topic of L.A.D.D., Inc. In addition this policy establishes that confidential information about the people supported may never be referred to on social media.

TRADEMARK/LOGO USE POLICY – Provides a description and image of the L.A.D.D., Inc. logo as well as acceptable/unacceptable uses of the logo.

GOOD MORAL CHARACTER POLICY - Every employee must demonstrate good moral character through out their employment with LADD. This means they will be honest, fair and respect the rights of others.

CONFLICT OF INTEREST CODE OF ETHICS POLICY - It is the policy of L.A.D.D., Inc. to promote a positive public image that aligns with the mission, vision and values of the company. All activities will be transparent for all to see and completed in a way that is free of conflicts of interest or ethical violations.

CORPORATE GIVING POLICY - L.A.D.D., Inc. engages in Corporate Giving that creates opportunities to advocate for the people supported, educate the public regarding L.A.D.D., Inc. and demonstrates our commitment to good corporate citizenship.

FUND RAISING POLICY - L.A.D.D., Inc. engages in fund raising activities that create opportunities to benefit the people supported, educate the public regarding L.A.D.D., Inc. and demonstrate our commitment to good corporate citizenship

GIFTS, BEQUESTS AND DONATIONS POLICY - L.A.D.D., Inc. provides supports to vulnerable people; and therefore must insure at all times that care is never influenced by gifts, money or favors. L.A.D.D., Inc. decisions are made solely for the benefit of the people supported.

WHISTLE BLOWERS POLICY – Employees who believe a policy or activity of L.A.D.D., Inc. is in violation of the law must follow the Complaint Reporting Policy to report. Complaints can be made anonymously or employees may disclose their name without fear of retaliation.

CORPORATE RESPONSIBILITY PLAN – It is the policy of L.A.D.D., Inc. to promote a positive public image that aligns with the mission, vision and values of the company. Company activities will be transparent and conducted in a manner that promotes the principles of inclusion, diversity, human rights and opportunities for all; ensuring the community is better place because L.A.D.D., Inc. is a part of it.

STANDARDS OF CONDUCT – It is the policy of L.A.D.D., Inc. to set and establish standards for the guidance of all employees regarding expectations for acceptable behavior. The following represents only a partial list of unacceptable behaviors and conduct; a complete list of all possible violations would be impossible to write. Honesty and integrity are an employment requirement. Infractions will lead to corrective action up to and including separation from employment.

SECTION III. Conducting Effective Training and Education.

All employees receive initial and ongoing training throughout their employment with L.A.D.D., Inc.

STAFF TRAINING POLICY - L.A.D.D., Inc. employees receive training necessary for full compliance with contract, accreditation and regulatory standards at the time of hire and ongoing as changes occur. Additional training may be required as a matter of best practice to ensure staff provides high quality services in a compassionate and caring way to the people who we support. The Corporate Training Matrix identifies required training by position within the organization.

QUALITY IMPROVEMENT TRAINING - Each member of the Management Team receives training on the policies, procedures and expectations of L.A.D.D., Inc. on a routine basis at staff and management meetings. Outcome reports will be reviewed by members of management for input on how to improve or maintain quality services.

SECTION IV. Developing Effective Lines of Communication.

Open, honest communication between managers and employees is a day-to-day business practice. Employees may seek counsel, provide or solicit feedback, or raise concerns within the company.

OPEN DOOR COMMUNICATIONS - L.A.D.D., Inc. employee relations policies emphasize open-door practices whereby employees are encouraged to deal directly with their supervisor and other members of management regarding complaints or perceived inequitable conditions of employment in an effort to preserve a positive work environment.

COMPLAINT REPORTING POLICY - The L.A.D.D., Inc. Complaint Reporting Policy ensures laws, regulations, policies and procedures that apply the company are followed at all times and there is a way to report suspected violations and document appropriate corrective action is taken. Management has the obligation to conduct a prompt, thorough, and impartial investigation. In certain circumstances it is possible to have a complaint from a stakeholder such as person supported, guardian, family member or employee reviewed by an external reviewer, outside of LADD. In addition, all individual stakeholders such as people supported, guardians and family members are afforded protection against retaliation or barriers to service.

SECTION V. Conducting Internal Monitoring and Auditing.

QUALITY ASSURANCE AUDIT POLICY - L.A.D.D., Inc. completes a full auditing and monitoring program designed to ensure all service provided by L.A.D.D., Inc. maintain the highest quality standards and are in compliance with regulations, laws and best practices guidelines.

AUDIT: RESPONDING TO AUDIT FINDINGS FROM EXTERNAL MONITORING AGENCIES - L.A.D.D., Inc. will respond to findings delineated in reports resulting from auditing by external regulatory agencies in a timely and thorough manner so that corrective action is completed and communicated within the entire organization and to the external regulatory agency.

SECTION VI. Enforcing Standards Through Well-Publicized Disciplinary Guidelines.

Employees receive a Employee Code of Conduct Handbook at the time of hire and training on going in employment policies/procedures that establish issues in which employees will receive disciplinary counseling and/or possible separation from employment. Violations of the CCP will be addressed in a timely and consistent disciplinary action which could include separation from employment. The purpose of this approach is to inform employees regarding LADD's efforts to combat fraud, waste, and abuse in the organization; to provide general information regarding the CCP, to describe the remedies and fines for violations that can result from certain types of fraudulent activities; and protections for reporting individuals.

SECTION VII. Responding Promptly to Detected Offenses and Undertaking Corrective Action.

L.A.D.D., Inc. employees are subject to corrective or disciplinary action under applicable existing L.A.D.D., Inc. personnel policies.

CLOSING

L.A.D.D., Inc. is committed to all elements of the Corporate Compliance Plan and continuously reviews and revises policy, procedures and practices to remain compliant with all laws, regulations and standards of best practice. L.A.D.D., Inc. is committed to standards for ethical practices concerning staff, Management and all operations of L.A.D.D., Inc. Inclusive in these is the expectation that support services are provided responsibly, fairly and with awareness of the surrounding community and provide services consistent with L.A.D.D., Inc. Mission, Vision and Values. The full Corporate Compliance Plan is available through the Employee Code of Conduct Handbook or by contacting the Corporate Compliance Officer at 269-782-0654.