

Corporate Compliance Policy

Department or Business Unit Owner:	Executive Leadership
Applies to:	All Employees
Policy Location: (list other locations in addition to LSS Connect, as applicable)	LSS Connect/Employee Resources/Organization Documents & Policies
Effective Date: (if known)	November 2020
Date(s) of Review/Revision:	
Replaces Policy:	
CARF Standard	1.A.7.
Legal & Other References:	LSS Employee Handbook, Code of Ethics, Conflict of Interest Policy, Medicaid Home and Community-Based Services Manual
LSS References & policies/procedures	

Policy Purpose:

The purpose of this Corporate Compliance policy is to develop internal controls that promote adherence to applicable laws, regulations, standards and ethical practices. Lutheran Social Services of Wisconsin and Upper Michigan, Inc. (LSS) Corporate Compliance policy is a proactive approach in assisting in prevention and detection of violations.

Policy Statement:

LSS is committed to ensuring compliance with all applicable laws, regulations, standards and ethical practices. This policy document in conjunction with our organization's Code of Ethics and Conflict of Interest policies make up our Corporate Compliance program.

Compliance Structure

LSS's compliance structure is comprised of our governing body, our designated compliance officer and committee members.

Governing Body

LSS's Board of Director's is the organization's governing body. The Board of Directors are responsible for the overall compliance of the organization. The CEO reports compliance and ethic matters to the Board of Directors on an as-needed basis, but at least annually.

Corporate Compliance Officer (CCO)

LSS has an appointed the Chief Operating Officer the Corporate Compliance Officer (CCO). The CCO is responsible for the Corporate Compliance Program. The CCO reports to the CEO. The CCO also has direct access to the Board of Directors.

Corporate Compliance Committee

LSS's corporate compliance committee which includes Chief Financial Officer, Chief Integration Officer, Human Capital Director, IT Director and Director of Quality Improvement meets with the CCO quarterly to discuss the organization's corporate compliance and ethics program. Meeting topics include but are not limited to: policy and

procedure review, law and regulation updates, compliance and ethics education and training, risk assessments, audits and detecting risks and violations.

Policies and Procedures

To ensure compliance of the applicable laws, regulations, standards and ethical practices, LSS Company develops and implements policies and procedures. LSS's policies and procedures are reviewed at least annually and revised on an as-needed basis by the CCO and the corporate compliance committee. Applicable policies and procedures are made available to LSS stakeholders. .'

Gifts and Gratuities

LSS policy for gifts is found in the Conflict of Interest policy.

Risk Assessment through Monitoring & Auditing

The CCO and the Corporate Compliance Committee identify and assess potential organizational risks, and oversee auditing and monitoring activities to ensure compliance. These potential risks are areas that may occur throughout our course of business. This list below are examples of potential risk areas:

- Resident/client rights
- Quality of care
- Privacy and confidentiality of records
- Exclusion screening and human resource issues
- Contract compliance
- Financial – billing and kickbacks

LSS's Risk Assessment is done in coordination with our Risk and Quality Improvement Team. Specific audits, monitoring and education may be delegated and investigated through Risk and Quality Improvement Team.

Education and Training

- Corporate compliance and ethics training is provided to board members at time of inception and annually. Staff and volunteers receive training at orientation, on an as-needed basis and at least annually.
- Outside parties (i.e. vendors, contractors) are educated on the organization's compliance matters through signed contract negotiations and on-site orientation.
- Compliance and ethics training is focused on federal and state regulations, best practices and our organization's policies and procedures. Topic specific training may also be identified by the CCO and committee or per management request.
- Education and Training may be conducted through a variety of different platforms including but not limited to: Relias Learning Software, Individual Face-to-Face, company-wide meetings, department meetings and email memos.
- LSS provides additional education and training on Medicaid billing, documentation, and record retention practices and coding to department specific employees upon hire and as-needed.

Reporting Methods

- In order to promote and further this practice, it is the policy of LSS that every employee, volunteer or representative of the Organization be encouraged and able to report, on an anonymous and confidential basis if they prefer, any conduct believed to be illegal or unethical such as: questionable or improper accounting or auditing matters; inappropriate use of LSS assets; violations of written company policy; other illegal practices (herein collectively referred to as "Concerns"). Employees should be aware that an anonymous report may be difficult to investigate. Therefore, we encourage, but do not require, identification of the employee reporting Concerns.
Process:

1. If any employee, volunteer or representative of LSS wishes to report a Concern, he or she may do so verbally or in writing to the Human Capital Director, Chief Integration

Officer, Chief Financial Officer, Chief Operating Officer (who also holds the role of LSS Compliance Officer) or Chief Executive Officer.

2. An individual may choose to file a Concern by mail or by email. Mail should be sent to the appropriate individual at: 6737 W. Washington St., Suite 2275, West Allis, WI 53214.
3. An individual may choose to go directly to the Board of Directors by following the guidance in the Whistleblower Policy.

Enforcement of Standards

- Any violation of or not following the policy may result in employment action, up to and including termination of employment.

Forms/References:

- Wisconsin Department of Health Services “Medicaid Home and Community-Based Services Waivers Manual”
- LSS Employee Handbook
- LSS Code of Ethics
- LSS Conflict of Interest Policy

Approved By:

Date:

Position: COO

Name: Joe Arzbecker