

Summary of the Catholic Charities' Corporate Integrity and Compliance Plan

This Plan evidences Catholic Charities' long-standing and continuing commitment to ethical business practices and to compliance with all applicable laws and standards governing the delivery and billing of mental health, alcohol and other drug services to its clients and patients, and the maintenance of the confidentiality of client/patient service records.

This Plan has also been designed to prevent, detect and correct instances of non-compliance with applicable laws, standards and the conditions of participation of private and governmentally-funded health care insurance programs.

Each employee of Catholic Charities shall, upon hiring, undergo training on the contents of this Plan, Catholic Charities' administrative policies and procedures, the laws governing the delivery of services provided by Catholic Charities, patient rights and client confidentiality requirements, and the prohibitions respecting fraud and abuse within the health care industry

All service and billing documentation will be accurate, timely and complete.

Claims for service reimbursement will be submitted only after adequate documentation supporting the services have been completed.

The organization will not enter into improper service referral relationships.

Catholic Charities requires that all operations, activities and business affairs, including those relating to client and patient matters, be kept confidential, subject to necessary compliance with applicable state and federal laws.

In conducting the business activities of the agency, all Parties owe a duty of loyalty to Catholic Charities.

All business transactions with vendors, contractors and other third parties on behalf of Catholic Charities shall be conducted at arms length, and be free from the influence of offers or solicitations of gifts and favors or other improper inducements in exchange for influence or assistance in a transaction.

Catholic Charities shall not retaliate against any employee, agent, contractor or vendor for reporting or inquiring about suspected or actual violations of the Compliance Plan, any state or federal statute, rule or policy, or any other internal practice or policy of Catholic Charities.

Catholic Charities managers and supervisors have a responsibility to know and understand the laws and regulations that apply to their area of responsibility and to exhibit and support a strong commitment to compliance.

It is the duty of all employees and independent contractors to notify the agency of any actual, apparent, or potential compliance violations as detailed in the agency’s Whistleblower Policy. Employees and independent contractors with such concerns must timely seek guidance regarding any questions they may have by any of the following actions:

- Reporting their concern to their supervisors, who in turn must relay them to the Corporate Compliance Officer;
- Dropping a note detailing their concerns in the inter-office mail marked “PERSONAL and CONFIDENTIAL”;
- Submitting questions or concerns in writing to the Corporate Compliance Officer; and
- Requesting a private meeting with the Corporate Compliance Officer.

Employees and independent contractors with knowledge of activities that they believe are illegal, unethical or in violation of this Plan may be disciplined for failure to report such conduct.

If an employee receives an investigative demand or subpoena, or is presented with a search warrant involving premises of the agency, the demand, subpoena or search warrant shall be brought immediately to the General Counsel and/or Compliance Officer. Employees shall not release, copy or allow the inspection of any CCHHS documents without authorization from the CEO, Executive Director or Corporate Compliance Officer.

Catholic Charities’ well-being and viability are dependent upon its continuing compliance with applicable laws, policies and ethical standards. The cooperation and assistance of all Catholic Charities employees in making this Compliance Plan work is an essential component of the effort to ensure that Catholic Charities will continue its mission to serve its clients and patients for years to come.

CCHHS’s Compliance Program is administered by the Corporate Compliance Officer, Patricia M. Holian, Executive Vice-President/C.O.O. She may be contacted at pmholian@clevelandcatholiccharities.org or at 216.334.2902.

Employee’s Signed Acknowledgement of Receipt

Date