



Title: Responding to Detected Offenses and Developing Appropriate Corrective Action Plans Policy

Date Created: March 1, 2015

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Date Approved by CCN Board of Directors: June 10, 2025

Date Approved by CCC Board of Directors: September 24, 2024

Date Approved by IPA Board of Directors: September 24, 2024

Policy# CC7

Purpose:

To communicate the process for investigating potential compliance infractions and the corrective response to those infractions.

Definitions:

Affected Individual(s): All persons who are affected by Care Compass Entities' risk areas including Care Compass Entities' employees, officers, Directors, managers, contractors, agents, subcontractors, independent contractors, governing bodies, or third-parties, who or that, in acting on behalf of the Care Compass Entities: (i) delivers, furnishes, directs, orders, authorizes, or otherwise provides health or social care items and services under State, Federal, or Care Compass programs; and (ii) contributes to the Care Compass Entities' entitlement to payment under Federal health or social care programs, or from other payor sources.

Care Compass Entities: Organizations that are directly, or indirectly through one or more intermediaries, owned or controlled by, or are under common ownership or control of, Care Compass Network, including Care Compass Collaborative, Inc and Care Compass Supporting IPA, LLC.

Participant: Any organization that has signed an agreement related to a funded program with the Care Compass Entities.

Staff: Employees, contractors, agents, consultants, volunteers, and others who act on the Care Compass Entities' behalf.

Policy:

It is the policy of the Care Compass Entities to ensure that it responds to information that a Affected Individual is engaging in activity that may be contrary to applicable Federal or State law or the requirements of the Care Compass Entities' Compliance Programs.

I. Investigations.

- a. The Care Compass Entities, as applicable, will conduct investigations, as needed, with the purpose of:
 - i. Identifying situations in which applicable Federal or State laws or the requirements of the Care Compass Entities' Compliance Programs may not have been followed;

- ii. Identifying individuals or organizations who may have knowingly or inadvertently violated the law or the Care Compass Entities' Compliance Programs requirements;
 - iii. Facilitating the correction of any violations or misconduct;
 - iv. Implementing procedures necessary to ensure future compliance;
 - v. Protecting the Care Compass Entities in the event of civil or criminal enforcement actions; and
 - vi. Preserving and protecting the Care Compass Entities' assets.
- b. Investigative controls will be implemented by the Director of Compliance.
 - i. The Director of Compliance will determine, with appropriate Staff or the Care Compass Entities' Compliance Committees or Board of Directors, as necessary, whether legal counsel is warranted. The Director of Compliance will be responsible for requesting such qualified legal counsel to:
 - 1. Initiate an investigation of the conduct in question;
 - 2. Prepare a report of findings for the Executive Director, the Care Compass Entities' Compliance Committees or Board of Directors (where applicable); and
 - 3. Recommend the appropriate actions to be taken by the Director of Compliance.
 - ii. During an investigation, the Director of Compliance, and anyone assisting qualified legal counsel in its investigation, will function under the direction and control of the Care Compass Entities' engaged legal counsel.
- c. Investigative Process
 - i. Upon receipt of information concerning the alleged misconduct or violation, the Director of Compliance will conduct an investigation following the ENT_CC7-1 Performing Investigations Procedure.
 - ii. For investigations in which the Care Compass Entities' qualified legal counsel is not involved, the Director of Compliance will ensure that significant developments are promptly reported to the Executive Director and Chair of the Care Compass Entities' Compliance Committees or Board of Directors, as applicable, so that a determination can be made, at any time during the investigation, as to whether the Care Compass Entities' qualified legal counsel should be contacted.

II. Organizational Response to Non-Compliance.

- a. In the event the investigation determines that there has been non-compliant activity, the Care Compass Entities will undertake corrective action and follow the ENT_CC7-2 Response to Non-Compliance Procedure.
- b. The Care Compass Entities will conduct, as appropriate, follow-up monitoring and auditing to ensure that the non-compliant activity has been discontinued and that any corrective action has been effective.

CCN Board Approval History: 3/11/2015, 12/8/2015, 12/10/2019, 11/10/2020, 11/9/2021, 11/8/2022, 8/08/2023, 8/13/2024, 6/10/2025

CCC Board Approval History: 9/12/2023, 9/24/2024

IPA Board Approval History: 9/12/2023, 9/24/2024

Compliance Committee Review History: 12/8/2015, 10/28/2016, 11/17/2017, 1/18/2019, 11/15/2019, 10/16/2020, 10/15/2021, 11/1/2022, 7/28/2023, 7/24/2024, 5/22/2025

Policy Revisions:

Date	Revision Log	Updated By
3/1/2015	Original creation	Ann Homer
11/19/2015	Updated to reflect Care Compass Network organization structure	Rebecca Kennis
11/4/2016	Added Board Review History	Andrea Rotella
11/15/2019	Updated with changes by Compliance and Audit Committee	Andrea Rotella
10/16/2020	Updated “Staff” definition	Andrea Rotella
8/29/2022	Added Partner definition and updated Partner Organization to Partner throughout	Cathy Petrak
7/12/2023	Added “Affiliated Entities” throughout to update to an enterprise-wide policy; updated Partner to “Participant” definition and term throughout; updated Corporate Compliance and Privacy Officer title to “Director of Compliance” throughout	Cathy Petrak
5/7/2025	Updated “Affiliated Entities” to “Care Compass Entities” throughout and added “Affected Individuals” definition and updates throughout	Cathy Petrak

This Policy shall be reviewed periodically, but not less than once every 12 months, and updated consistent with the requirements established by the Board of Directors, Care Compass Network’s Leadership Team, Federal and State law(s) and regulations, and applicable accrediting and review organizations.