



Corporate Compliance Plan

Aspire of Western New York has adopted a Corporate Compliance Plan and Standards of Conduct/Business Ethics Policy & Procedure (P&P) as part of its Corporate Compliance Program. This program has been in place since 2000 and is regularly reviewed and updated. The purpose of the Compliance Plan is to reduce the likelihood of improper, illegal and unethical activities, and provide a process for effective resolution if compliance issues do occur. Aspire's commitment to legal and ethical business practices is essential to the advancement of its vision and mission.

Aspire's Board of Directors affirms that it is Aspire's policy to comply with all applicable laws, regulations, and ethical standards. This Compliance Plan formalizes the Agency's compliance efforts and more clearly defines the responsibilities of its employees and contractors. This plan further complies with the United States False Claims Act, Deficit Reduction Act of 2006 and New York State Medicaid Inspector General Guidelines which prohibit knowingly presenting or causing a false or fraudulent claim for payment to be made.

What is the Aspire Corporate Compliance Program about?

The aim of the Corporate Compliance Program is to prevent and detect violations of the law and to ensure that Aspire and all of its employees and contractors, properly and legally perform their assigned duties.

The Plan includes how Aspire monitors and audits to detect non-compliance and improve quality. Aspire ensures that false claims and statements are addressed and ensures the protection of reporters from potential retaliation.

Who is responsible for carrying out our Corporate Compliance Plan?

Every employee has a part to play because employees are the eyes and the ears of the organization. Anyone who sees or has reason to believe that a policy, procedure, or law is not being followed is responsible to report his/her concern to the **Corporate Compliance Officer – Susan Mentecki** on the Aspire HOTLINE at **505-5671**.

How does Aspire ensure compliance with its ethics plan?

Aspire conducts staff training, screens new and current employees, ensures all laws and regulations are followed for documentation and billing, investigates compliance complaints, and conducts compliance self audits.

How can employees help Aspire abide by its plan?

- Be familiar with legal and regulatory requirements to your specific job (consult with supervisor for guidance, attend staff meetings and outside trainings)
- Prepare patient/consumer records accurately, completely, and honestly



- DOCUMENT all services! Never falsify, back-date, intentionally destroy, or alter any document to gain a real or perceived advantage for Aspire
- Report if you know of any waste, fraud, or abuse to your supervisor, Corporate Compliance Officer, or the Compliance Hotline – **505-5671**
 - Report as much information as you know
 - Aspire commits to a non-retaliation policy and assures whistleblower protection
- Ask yourself:
 - Are my actions ethical?
 - Do my actions comply with Aspire’s policies?
 - Do my actions have the appearance of impropriety?
 - Could my actions be questioned by supervisors, co-workers, consumers, parents?

To obtain further information or guidance about Aspire’s Compliance Plan, Standards of Conduct/Business Ethics P&P and applicable laws and regulations, we urge you to contact the Corporate Compliance Officer at **(716) 505-5671**, or any member of the Corporate Compliance Committee.