

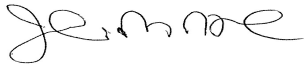


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POLICY STATEMENT

Topic: Documentation of Compliance Activities Date Effective: 7/1/2019

Revised New Section: Corporate Compliance Number: 10.13

Date: 7/1/2019 Approved by: 

POLICY

Documentation of actions taken under The Arc Mid-Hudson, The Arc of New York, Inc., Corporate Compliance Plan is a key factor in the effectiveness of the Plan. The Arc Mid-Hudson, The Arc of New York, Inc., must be able to demonstrate the actions taken throughout the development and implementation of the Corporate Compliance Plan are reasonable in the event that The Arc Mid-Hudson, The Arc of New York, Inc., is investigated by outside regulatory bodies.

This policy shall apply to corporate compliance documentation referenced under each policy and procedure of the Corporate Compliance Plan and other The Arc Mid-Hudson, The Arc of New York, Inc., policies, as described in detail in this policy.

SCOPE

This policy shall apply to all documentation referenced under each policy and procedure of the Corporate Compliance Plan and other The Arc Mid-Hudson policies, as described in detail in this policy.

PROCEDURE

Maintenance and Handling Procedures for Documents

The Director of Quality Management/Corporate Compliance or designee will create and maintain, or oversee the maintenance of all documentation of the Corporate Compliance Plan, including the Corporate Compliance Plan Policies and Procedures, the date on which these policies were adopted and updated, if applicable.

Name of Document: Documentation of Compliance Activities 10.13
Date last updated: 7/1/2019
Updated by: M.LeBlanc

The Director of Quality Management/Corporate Compliance or designee will maintain a log of all compliance-related complaints of which he or she is aware. Each version of the Compliance Log should be dated and will be updated as the complaint resolution process progresses. The Compliance Log will be made available upon request from the Executive Director, any member of the Board of Directors, any member of the Audit Committee or any member of the Corporate Compliance Committee. Information will be recorded in the log as follows:

- Assigned number—year and number (e.g. 2009-001 for the first complaint of 2009);
- Date the complaint was received;
- Source of the complaint (e.g. staff, corporate compliance hotline, etc.);
- Type of report (e.g. question, billing issue, etc.);
- Program;
- Summary;
- Date Resolved;
- Disposition; and
- Date of Corporate Compliance Committee Review.

Activities related to the Corporate Compliance Plan may result in the creation or receipt of documents that are of a confidential nature. These may include business documents, investigation materials, or individuals supported records that must be protected from general disclosure or distribution. These records are maintained confidentially by Corporate Compliance Staff.

Many of the records that will be generated by the Director of Quality Management/Corporate Compliance or designee or obtained in the course of The Arc Mid-Hudson, The Arc of New York, Inc., business will be of a confidential nature as the result of a communication with legal counsel. The Director of Quality Management/Corporate Compliance or designee, in consultation with Counsel, where necessary, will determine which documents should be confidential as a result of communication with legal counsel. Those documents will be placed in a red folder, labeled “Attorney-Client Privileged Information” and maintained with the corresponding audit/investigative file. All efforts will be made to refrain from duplicating documents that are Confidential and/or Attorney-Client Privileged. All documents that are Confidential and/or Attorney-Client Privileged will be maintained in a secure fashion. The Director of Quality Management/ Corporate Compliance or designee will create and maintain a list of which Chapter employees may access the Confidential and Attorney-Client Privileged documents.

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