

# THE CENTER FOR DISCOVERY

SUBJECT: Communications from Regulatory Agencies

MANUAL: Corporate Compliance

SECTION: Section 3

## Purpose:

The Center for Discovery is committed to achieving compliance with all applicable regulatory communications (e.g., Medicare Bulletins, Medicaid Alert, and memoranda issued by the fiscal intermediary or the Centers for Medicare and Medicaid Services (CMS), Memoranda and notices from the Office for People with Developmental Disabilities (OPWDD), NYS Education Department, The Justice Center for the Protection of People With Special Needs, and Department of Health (DOH)). To achieve this, the Center has established a process for dissemination of memoranda, alerts and notices to the appropriate departments with development of resulting policies and procedures as appropriate.

## Policy:

1. The President / CEO, Associate Executive Director, Chief Financial Officer, Chiefs of Programmatic Services, Health Services, Quality Improvement, Operations, and People Operations periodically receive memoranda and communications from the various regulatory agencies who have oversight of agency programs. Department chiefs are responsible for dissemination of the communications to the Directors of the applicable departments who are responsible for implementation of policies/procedures as needed.
2. The Corporate Compliance Officer will provide oversight for this process as needed.
3. The Center will ensure that all communications are disseminated in a timely fashion to Department Directors responsible for implementation.
4. A system of accountability will be established to ensure compliance.

## Procedures:

1. The Office of the President / CEO is most often the initial Office to receive communication from all agencies with regulatory oversight. Correspondence should be directed by the recipient to this office.
2. The communication will be forwarded to the appropriate department Chief(s) as well as the CCO and those who may also be impacted.
3. Should the communication necessitate generation of a new policy, those department heads impacted will develop a policy and, once completed and approved, will disseminate it to the department directors for implementation. The CCO will provide input and direction as needed.
4. The appropriate Department Directors will be advised of the deadline for implementation, and will be advised to notify the Department Chief(s) and the Corporate Compliance Officer in writing when implementation is achieved.

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5. The Corporate Compliance Officer will track compliance status on these changes.

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