

**Blue Water Developmental Housing, Inc.**

**Corporate Compliance Plan**

**2016-2017**



## **CORPORATE COMPLIANCE PLAN**

Blue Water Developmental Housing, Inc. (BWDH) created a centralized Corporate Compliance Plan which addresses our commitment to the provision of quality services for individuals with developmental disabilities. The plan is created in accordance with the guidelines set forth by the Department of Health and Human Services. Within these guidelines, we integrated our commitment to compliance, our policies and procedures, external and internal reporting mechanisms, training and education and evaluative techniques. The goal of the compliance program is integrating existing practices with new initiatives while providing avenues for employees to make ethics inquiries.

All employees are encouraged to use our “open door policy” to discuss employment issues. They are also encouraged to report violations of the Code of Ethics to their supervisor, the compliance officer or the executive director without fear of retribution.

### **STANDARDS**

- All employees are expected to conduct themselves in a manner that promotes the Mission, Vision and Code of Ethics of the organization.
- The process for reporting compliance or non-compliance will be posted at all times.
- Detection of non-compliance will occur through already established reviews, including audit, claims data, record reviews and complaints made by employees, individuals served, parents, guardians, or others.
- BWDH shall investigate its own complaints and report compliance issues on a quarterly basis (or as needed). The report may include requests from BWDH for an outside party to assist in the investigation.
- Plans of correction shall address remediation of the specific allegation and may include a plan for change in policy designed to prevent recurrence of similar findings in the future.

### **TRAININGS**

Employees of the organization receive the following trainings at the time of hire and periodically during their employment:

\*Code of Ethics

\*HIPAA / I.S. Security

\*Corporate Compliance

\*Recipients Rights

\*Cultural Diversity

\*Proper Lifting Techniques

\*Slips, Trips, and Falls

\*Dignity and Respect

**SUMMARY OF REPORTS  
FISCAL YEAR 15-16**

**Investigations Conducted**

	<b>Allegations</b>	<b>Substantiations</b>
<b>Department of Licensing and Regulatory Affairs</b>	<b>0</b>	<b>0</b>
Action Taken:		
<b>Code of Ethics</b>	<b>0</b>	<b>0</b>
Action Taken:		
<b>Violation of Criminal / Civil / Administrative Law</b>	<b>0</b>	<b>0</b>
Action Taken:		
<b>Parent/Guardian</b>	<b>0</b>	<b>0</b>
Action Taken:		
<b>Recipient Rights</b>	<b>16</b>	<b>14</b>
<i>Macomb County</i>	<i>13</i>	<i>12</i>
<i>Saint Clair County</i>	<i>3</i>	<i>2</i>
Action Taken: The organization continues to require annual training in the area of recipient rights along with dignity and respect. Supports coordinators and clinicians utilize staff meetings within our organization for in-servicing employees with regard to individual plan of service implementation. Disciplinary and remedial action are completed immediately so that service delivery may not be disrupted.		
<b>Personal Issue</b>	<b>0</b>	<b>0</b>
Action Taken:		
<b>Health and Safety</b>	<b>0</b>	<b>0</b>
Action Taken:		
<b>Workplace Violence</b>	<b>0</b>	<b>0</b>
Action Taken:		
<b>HIPAA / Confidentiality</b>	<b>0</b>	<b>0</b>
Action Taken:		