

**BLUE WATER DEVELOPMENTAL HOUSING, INC.
POLICIES AND PROCEDURES: EMPLOYEE INFORMATION**

SUBMITTED BY: Jennifer Stringer	DATE SUBMITTED: 01/13/2016	SECTION: Administrative	
BOARD APPROVED ON: 02/10/2016	DATE REVISED: 09/16/2020, 3/27/2023, 4/3/2025, 8/5/2026	SUBJECT: Corporate Compliance	
ANNUAL REVIEW BY EXECUTIVE DIRECTOR: 07/27/17, 11/21/18, 09/16/2020, 9/16/2022, 3/27/2023, 8/5/2026		POLICY #: EA-002	PAGE #: 1 of 5

I. APPLICATION

This policy applies to all individuals employed by, contracted with, or acting on behalf of Blue Water Developmental Housing, Inc. (BWDH) in any capacity.

II. POLICY

It is the policy of Blue Water Developmental Housing, Inc. (BWDH) to maintain a comprehensive Corporate Compliance Program that promotes honesty, integrity, and adherence to all applicable federal, state, and local laws by establishing clear standards of conduct, providing mechanisms for reporting and investigating compliance concerns, conducting monitoring and auditing activities, implementing corrective actions to address identified risks, and protecting individuals from retaliation when they report concerns or participate in compliance activities.

III. DEFINITIONS

- A. **Abuse:** Provider practices inconsistent with sound fiscal, business, or clinical standards that result in unnecessary cost or improper reimbursement, including beneficiary practices that create unnecessary Medicaid program costs.
- B. **Alleged Illegal Conduct:** Behaviors such as intimidation, harassment, unethical conduct, or actions inconsistent with BWDH's Code of Ethics.
- C. **Alleged Improper Conduct:** That conduct which includes such behaviors as intimidation, harassment and other unethical behavior.
- D. **Fraud:** Intentional deception or misrepresentation made with knowledge that it may result in unauthorized benefit, including acts defined under federal or state law such as the Federal False Claims Act and Michigan Medicaid False Claims Act.
- F. **High Probability:** Exists when improprieties exceed what a reasonable person would consider a mistake, continue after a warning, or when a credible allegation of improper or illegal activity is reported.
- G. **Waste:** Overutilization or misuse of resources resulting in unnecessary cost.
- H. **Whistleblower/Protected Activity:** Good-faith reporting of compliance concerns, participating in investigations, or refusing to participate in wrongdoing.

**BLUE WATER DEVELOPMENTAL HOUSING, INC.
POLICIES AND PROCEDURES: EMPLOYEE INFORMATION**

SUBMITTED BY: Jennifer Stringer	DATE SUBMITTED: 01/13/2016	SECTION: Administrative	
BOARD APPROVED ON: 02/10/2016	DATE REVISED: 09/16/2020, 3/27/2023, 4/3/2025, 8/5/2026	SUBJECT: Corporate Compliance	
ANNUAL REVIEW BY EXECUTIVE DIRECTOR: 07/27/17, 11/21/18, 09/16/2020, 9/16/2022, 3/27/2023, 8/5/2026		POLICY #: EA-002	PAGE #: 2 of 5

IV. STANDARDS

- A. All employees, contractors, and individuals acting on behalf of BWDH must conduct themselves in a manner that promotes BWDH's Mission, Vision, Values, Code of Conduct, and Code of Ethics.
- B. Information about how to report compliance or ethical concerns, including anonymous reporting options, must be posted at all BWDH sites.
- C. Detection of non-compliance will occur through audits, monitoring activities, record reviews, and complaints made by employees, individuals served, guardians, contractors, or other stakeholders.
- D. BWDH will investigate compliance complaints promptly and report compliance activity on a quarterly basis or as required by contracting agencies. External resources may be used when appropriate.
- E. Corrective action plans will address remediation of the specific allegation and may include policy or process changes designed to prevent recurrence.
- F. Possible findings may include falsification of records, theft of agency or consumer property, fraudulent or deceptive actions, inadequate documentation, unauthorized transactions, or other conduct inconsistent with legal, ethical, or regulatory requirements.
- G. BWDH will evaluate identified risk areas, including the magnitude of the risk, changes from prior periods, and recommended actions for remediation.

V. NOTIFICATION/PROCEDURE

WHO	Complaint Process DOES WHAT
Employee	1. Identifies concerning, improper, illegal, or unethical conduct involving an individual, program, or provider. 2. Reports the concern immediately to the Compliance Officer or Division Director using any reporting method, including phone, email, written complaint, or anonymous reporting options.

**BLUE WATER DEVELOPMENTAL HOUSING, INC.
POLICIES AND PROCEDURES: EMPLOYEE INFORMATION**

SUBMITTED BY: Jennifer Stringer	DATE SUBMITTED: 01/13/2016	SECTION: Administrative
BOARD APPROVED ON: 02/10/2016	DATE REVISED: 09/16/2020, 3/27/2023, 4/3/2025, 8/5/2026	SUBJECT: Corporate Compliance
ANNUAL REVIEW BY EXECUTIVE DIRECTOR: 07/27/17, 11/21/18, 09/16/2020, 9/16/2022, 3/27/2023, 8/5/2026		POLICY #: EA-002
		PAGE #: 3 of 5

Compliance Officer

3. The Compliance Officer assists the reporter in completing the Complaint of Non-Compliance form and will maintain anonymity to the extent possible.
4. Complaints involving potential Recipient Rights violations will be referred to the Recipient Rights Office; concurrent investigations may occur when appropriate.

WHO

Compliance Officer

**Investigation Process
DOES WHAT**

1. Determines whether the allegation is a reportable compliance event and consults with leadership when necessary.
2. Assigns a complaint number using a fiscal-year numbering system and records it in the compliance log.
3. Categorizes the complaint and notifies appropriate leadership, including the Recipient Rights Office when applicable.
4. Acknowledges receipt of the complaint within five (5) business days when the reporter is known.
5. Conducts interviews, gathers documentation, and performs a thorough investigation; external resources may be used when appropriate.
6. Completes the Non-Compliance Investigative Report within thirty (30) days unless extenuating circumstances exist.
7. Recommends corrective action, disciplinary action, or operational improvements as appropriate.

**BLUE WATER DEVELOPMENTAL HOUSING, INC.
POLICIES AND PROCEDURES: EMPLOYEE INFORMATION**

SUBMITTED BY: Jennifer Stringer	DATE SUBMITTED: 01/13/2016	SECTION: Administrative
BOARD APPROVED ON: 02/10/2016	DATE REVISED: 09/16/2020, 3/27/2023, 4/3/2025, 8/5/2026	SUBJECT: Corporate Compliance
ANNUAL REVIEW BY EXECUTIVE DIRECTOR: 07/27/17, 11/21/18, 09/16/2020, 9/16/2022, 3/27/2023, 8/5/2026		POLICY #: EA-002
		PAGE #: 4 of 5

- | | |
|---------------------|---|
| | 8. Forwards the completed report and recommendations to the Executive Director. |
| Executive Director | 9. Reviews the investigative report within ten (10) business days. |
| | 10. Makes a determination regarding the findings and recommended actions. |
| | 11. Notifies the Board of Directors and contracting agencies of substantiated findings. |
| Compliance Officer | 12. Reports to law enforcement, licensing bodies, or other authorities when required. |
| | 13. Ensures final report distribution to appropriate parties. <ul style="list-style-type: none"> a. Complainant (as appropriate) b. Executive Assistant |
| Executive Assistant | 14. Logs findings into the Corporate Compliance database for tracking and trend analysis. |

- | | |
|--------------------|---|
| WHO | Reporting Process
DOES WHAT |
| Compliance Officer | <ol style="list-style-type: none"> 1. Completes quarterly Corporate Compliance Reports and forwards them to BWDH Management, which serves as the Quality Improvement Committee, and provides copies for electronic filing. 2. Reviews the Corporate Compliance Plan at least annually and updates it as needed. 3. Reviews and analyzes complaint data to identify trends, risk areas, or patterns of concern. |

**BLUE WATER DEVELOPMENTAL HOUSING, INC.
POLICIES AND PROCEDURES: EMPLOYEE INFORMATION**

SUBMITTED BY: Jennifer Stringer	DATE SUBMITTED: 01/13/2016	SECTION: Administrative
BOARD APPROVED ON: 02/10/2016	DATE REVISED: 09/16/2020, 3/27/2023, 4/3/2025, 8/5/2026	SUBJECT: Corporate Compliance
ANNUAL REVIEW BY EXECUTIVE DIRECTOR: 07/27/17, 11/21/18, 09/16/2020, 9/16/2022, 3/27/2023, 8/5/2026		POLICY #: EA-002
		PAGE #: 5 of 5

4. Provides recommendations to the Executive Team for corrective or follow-up actions..

Executive Director

5. Submits the Corporate Compliance Plan to the Board of Directors for annual approval.

**Office of Inspector General, Sanctioned Provider List and
Public Sex Offender Registry Process**

WHO

Human Resource
Manager/Administrative Focus
Recruiter

DOES WHAT

1. Conducts exclusion screening prior to hire, annually, and as required by contracting agencies, verifying that personnel are not listed on the LEIE, Michigan SPL, Michigan PSOR, or other required exclusion databases.
2. Documents all screening results and maintains records in accordance with retention requirements.
3. Immediately notifies the Executive Director if an individual is found on any exclusion list and initiates required actions, including removal from duties and reporting to contracting agencies when applicable.

VI. EXHIBITS

- A. ..\..\Forms\Complaint forms\Corporate Compliance Complaint of Non-Compliance form_revised 3.6.2023.doc
- B. <..\..\Forms\Complaint forms\Non-Compliance Investigative Report js.08.28.13.docx>
- C. <..\..\Forms\Complaint forms\Corporate Compliance Quarterly Reporting.xlsx>