



Corporate Compliance Annual Report

Presented By Maggie Reck-K
Corporate Compliance
Officer



NOVA HOUSE ASSOCIATION, INC.

Administration, Residential
Outpatient, Training
732 Beckman Street
Dayton, Ohio 45410
(937) 253-1680
Fax (937) 253-8990

Nova North Star
136 Heid Avenue
Dayton, Ohio 45404
(937) 235-9521
Fax (937) 235-9803

CORPORATE COMPLIANCE REPORT FY07 to FY08 Reference: Corporate Compliance Plan

In my role as CCO, I am expected to review the agency along specified topics, and in addition, I do an overall personal evaluation of the agency on topics that I believe important to the effective and ethical operation of a social service agency.

In my periodic, unannounced discussions with staff, I covered various topics as appropriate to the conversation: Billing and Coding; Business Transactions; Medical and Clinical Necessity; Documentation; Client Rights; Consumer Choice; Use/mis-use of Agency Resources; Professional Credentialing/exclude parties.

There was no indication that any applicant for employment or treatment was illegally discriminated against. There is a Client Rights Officer to address related complaints or any other complaint. There were none during the period of review and I don't believe that there ever has been a client discrimination complaint in the history of Nova House. I verified postings of our Organization Ethics Statement and bulleting board, then confirmed that the Executive Director and Clinical Director serve to discuss ethical issues. I am always available as a third voice in those discussions. All employees seemed to have a notion as to how to file complaints about corporate compliance and have no concerns about retaliation.

All staff have been oriented to Corporate Compliance, within 6 months for new hires and an annual reminder for all others. Special attention is directed toward confidentiality and I have met with a large sample of personnel, not everyone, but a few in each department or area. I have done this over a period of time and in a way that promotes direct and honest communication. This report is the summary of those meetings, discussions and input from various parties.

Treatment personnel like working at Nova House. They like their co-workers and state that they have good teamwork. The dislike the amount of paperwork that is required in their jobs and appears to be increasing. This leads to less direct time with clients. Some mentioned low pay as an issue.

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Administrative personnel stated they like their co-workers, like their jobs, and have adequate pay. They would like to feel more acceptance, understanding and effective communication with "higher ups".

My interpretation of input from the levels of the organization is that the infrastructure is stable and strong. There appears to be misunderstanding, often by newer staff members, of the Nova House culture and treatment. I suggest training on treatment techniques for all staff and other cross-training at some level, so that everyone has an idea of what everyone else is doing.

In all my interviewing, there was never a hint of wrongdoing. Indeed, staff seemed to take pride in the knowledge that Nova House does things correctly. All local, state, federal, agency, and funder requirements to prevent fraud, abuse, or other illegal/unethical acts appear to be followed by all personnel. There appears to be adequate supervision over these matters.

Respectfully submitted,

Maggie Reck-K, Corporate Compliance Officer

NHA/mrk