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| <b>Topic:</b> New Government Initiatives Related to Corporate Compliance                                                                              | <b>Department:</b> All departments  |
| <b>Original effective date:</b> 5/17/02                                                                                                               | <b>Last revision date:</b> 9/22/25  |
| <b>Owner:</b> VP for Quality and Compliance                                                                                                           | <b>Frequency of reviews:</b> Annual |
| <b>Internal/Regulatory Reference(s) (all that apply):</b> Federal Sentencing Guidelines 8B2.1(2); 18 NYCRR 521.3(1); NYS Social Services Law 363-d(2) |                                     |
| <b>Related documents/Links:</b> NA                                                                                                                    |                                     |

**Policy:** It is the policy of The Arc of Monroe (“The Arc”) that business, administrative and support functions promote personal and organizational outcomes.

**Additional Information:** Periodically, both the state and federal governments revise laws, statutes, rules and regulations or institute new ones (“legal and regulatory requirements”). The Arc has an ongoing responsibility to ensure compliance with all applicable requirements, and to update its policies, procedures, and practices as necessary to ensure the same. The VP for Quality and Compliance is responsible for ensuring that new regulations and mandates are communicated to the appropriate parties.

| <b>Procedure</b>                                                                                                                                                                                                                                                                           |                                                                                          |
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| <b>Task:</b>                                                                                                                                                                                                                                                                               | <b>Responsible party:</b>                                                                |
| 1. When The Arc is informed of revisions to existing legal and regulatory requirements, we will identify any material changes and update our policies, procedures and practices as necessary.                                                                                              | Management, Quality/Operations Coordinators, VP for Quality and Compliance, or designees |
| 2. When new legal and regulatory requirements are issued, we will review them to determine the likely impact. Policies, procedures, and other processes will be developed or updated as necessary to ensure ongoing compliance.                                                            | Management, Quality/Operations Coordinators, VP for Quality and Compliance, or designees |
| 3. Any new or revised agency policies etc. based on regulatory changes will be formally communicated to affected staff so that they are aware of changes. This may range from a simple communication to formal training depending on the nature or extent of the new/revised requirements. | Management, Quality/Operations Coordinators, VP for Quality and Compliance, or designees |
| <b>Manager responsibilities:</b>                                                                                                                                                                                                                                                           |                                                                                          |
| 1. Managers are responsible for understanding any new or revised regulatory changes to their programs and services                                                                                                                                                                         | Managers                                                                                 |
| 2. They are responsible for ensuring that policies, procedures and practices are updated and shared as necessary for ongoing compliance with new or revised legal or regulatory Requirements.                                                                                              | Managers                                                                                 |
| 3. Managers may choose to involve their Quality or Operations Coordinators to assist with the policy revision process                                                                                                                                                                      | Managers; Quality/Operations Coordinators                                                |

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| <b>VP for Quality and Compliance:</b>                                                                                                                                                                                                           |                               |
| 1. The VP for Quality and Compliance acts as the The Arc's Compliance Officer, as required in NYS law.                                                                                                                                          | VP for Quality and Compliance |
| 2. Has primary responsibility for administering the The Arc's compliance program, and related policies and procedures.                                                                                                                          | VP for Quality and Compliance |
| 3. Is responsible for ensuring that, as it becomes available, information on new or revised legal or regulatory requirements is communicated to the appropriate parties.                                                                        | VP for Quality and Compliance |
| 4. Acts as a resource for The Arc staff and management around complying with federal and state requirements, and in assisting with the revision or development of new policies, procedures and practices in response to any regulatory changes. | VP for Quality and Compliance |

**Document revision record:**

| <b>Revision Date</b> | <b>Release Date</b> | <b>Reason for change</b>                                                                               | <b>Approver</b>                             |
|----------------------|---------------------|--------------------------------------------------------------------------------------------------------|---------------------------------------------|
|                      | 5/17/02             | New policy                                                                                             | Corp Comp Committee and Executive Mgmt Team |
| 10/27/05             | 10/27/05            | Reasons for changes not documented                                                                     | P Dancer                                    |
| 5/20/08              | 5/20/08             | Reasons for changes not documented                                                                     | P Dancer                                    |
| 10/17/12             | 10/17/12            | Reasons for changes not documented                                                                     | P Dancer                                    |
| 5/31/13              | 5/31/13             | Reasons for changes not documented                                                                     | P Dancer                                    |
| 10/24/14             | 10/24/14            | Reasons for changes not documented                                                                     | P Dancer                                    |
| 7/29/15              | 7/29/15             | Reasons for changes not documented                                                                     | P Dancer                                    |
| 6/5/17               | 6/5/17              | Reasons for changes not documented                                                                     | P Dancer                                    |
| 11/25/19             | 11/25/19            | Transition to new procedural format                                                                    | P Dancer                                    |
| 9/29/21              | 10/8/21             | Fleshed out details; added discrete sections for managers and the VPQC                                 | ICC                                         |
| 9/27/22              | 9/27/22             | Added "or updated" to procedure step 2, last sentence                                                  | ICC                                         |
| 10/30/23             | 10/30/23            | Added clarifying statement to #3 of general procedure (end of last sentence); Corrected typo           | ICC                                         |
| 9/22/25              | 10/23/25            | Added a statement that QCs and OCs may be included in the review and update of policies and procedures | ICC                                         |