



Colorado Corporate Compliance Plan

Effective Date: 08/25/2025

Approved By: David Hogan, CEO

A Message from Leadership

At Venture Forthe, Inc., compliance is more than following rules — it is about keeping people safe and protecting the integrity of the services we provide. Venture Forthe, Inc. provides home care and related community-based services in Colorado in accordance with applicable state and federal laws and regulations.

This Compliance Plan applies to all Colorado services provided by Venture Forthe, Inc., including employees, contractors, caregivers, clients, representatives, leadership, and any individuals participating in agency operations.

What Compliance Means

The word compliance simply means following the rules. In health care, compliance means that everyone involved with the agency — including employees, contractors, caregivers, clients, representatives, and leadership — works together to follow applicable laws, regulations, and program requirements.

Compliance applies in many areas, large and small. The goal is always the same: to make sure clients receive safe, fair, and lawful services while protecting clients, caregivers, employees, and Venture Forthe, Inc.

Purpose of the Compliance Plan

The purpose of this plan is to make sure Venture Forthe, Inc. follows all state and federal requirements for all services provided. It sets out the systems we use to prevent fraud, waste, and abuse; protect private information; handle complaints; conduct audits; and train staff.

Venture Forthe, Inc.'s Role

Venture Forthe, Inc. provides services under applicable state licensure, Medicaid enrollment, and program requirements. The agency is responsible for operational oversight, quality assurance, regulatory compliance, staff qualifications, service coordination, documentation standards, billing integrity, and protection of client rights.

Additional program-specific requirements may apply depending on the service provided, payer source, waiver program, or licensure classification.



Fraud, Waste, and Abuse

Information related to reports of suspected fraud, waste, abuse, or neglect is documented and maintained by the agency in accordance with applicable state and federal regulatory requirements. Documentation includes sufficient detail to support review of the allegation, investigative actions taken, findings, and any corrective action implemented when necessary. This information is reviewed and reported in accordance with applicable state and federal regulatory requirements and agency governance practices.

Fraud, waste, and abuse put services at risk for everyone. Fraud occurs when someone knowingly provides false information or bills for services they did not provide. Abuse includes practices that cause unnecessary costs or break program rules. Waste refers to careless use of Medicaid resources.

Some examples of fraud, waste, or abuse include:

- Billing for services not rendered.
- Falsifying EVV records or other service documentation.
- Misuse of client funds or property.
- Providing services without required qualifications and/or clearance.

These are examples, not a complete list. The key point is that everyone must report any suspicion of fraud, waste, or abuse to Venture Forthe, Inc. right away.

Penalties for Fraud

Fraud is a violation of both state and federal law. Anyone who commits fraud may face disciplinary action by Venture Forthe, Inc., immediate termination, repayment of improper claims, and referral to law enforcement. Under the Federal False Claims Act and Colorado law, penalties may also include civil fines, restitution, exclusion from Medicaid, and criminal prosecution.

Whistleblower Protections

No one should ever fear retaliation for reporting concerns. Venture Forthe, Inc. strictly prohibits retaliation against anyone who reports suspected fraud, abuse, or neglect in good faith. Federal and Colorado whistleblower laws protect employees, contractors, caregivers, clients, representatives, leadership, and any individuals participating in agency operations from being threatened, harassed, suspended, demoted, or terminated for raising a compliance concern.

Disciplinary Actions

In addition to penalties under the law, Venture Forthe, Inc. uses a fair and consistent disciplinary system to address violations of policy or program rules. Minor or first-time issues may be addressed with counseling, retraining, or written reminders. Continued violations or more serious problems may result in written warnings, suspension, or reassignment.



Severe violations — such as fraud, abuse, neglect, or other misconduct that endangers an individual receiving services or undermines Medicaid integrity — will result in immediate termination and referral to authorities. These standards apply to caregivers, employees, contractors, clients, representatives, and other individuals involved in agency operations.

Prohibited Practices and Eligibility Standards

Venture Forthe, Inc. enforces strict rules to ensure fairness and protect the integrity of services. No one may offer or accept bribes, kickbacks, gifts, or financial incentives connected to services. These practices are illegal and will not be tolerated.

To ensure rules are followed, background checks and exclusion screenings are conducted for applicable agency staff at intervals required by regulations and agency procedures. If staff becomes ineligible, they must report it to Venture Forthe, Inc. right away so a replacement can be arranged.

Mandatory Reporting of Abuse, Neglect, or Exploitation

Examples of abuse, neglect, or exploitation include but are not limited to: physical abuse such as hitting or rough handling; verbal or emotional abuse such as threats or humiliation; neglect such as failing to provide food, water, or necessary medical care; and financial exploitation such as misuse of an individual receiving services' money or property.

Venture Forthe, Inc. takes the safety and well-being of clients, caregivers, employees, contractors, and all individuals involved in agency operations seriously. Everyone is required by Colorado law to immediately report any suspected abuse, neglect, or exploitation of an individual receiving services. This includes physical abuse, verbal or emotional abuse, financial exploitation, or neglect of a person's basic needs.

Reports must be made to Adult Protective Services (APS) or the appropriate county authority, and Venture Forthe, Inc. must also be notified immediately so the agency can act quickly to protect the individual receiving services and cooperate with investigators.

Complaints and Resolutions

Venture Forthe, Inc. maintains documentation related to complaints in accordance with applicable state and federal regulatory requirements. Documentation supports review of the complaint, actions taken, and outcomes, and is reviewed through established agency oversight processes to ensure complaints are addressed in a timely and appropriate manner.

All individuals involved in the program, including clients, representatives, caregivers, employees, contractors, and staff, have the right to file a complaint. Complaints may be submitted verbally, in writing, or electronically and are documented and reviewed in accordance with agency procedures.

The agency acknowledges complaints and initiates review in a timely manner consistent with regulatory requirements. Complaints are reviewed and addressed by agency leadership or qualified designated staff, and appropriate actions are taken as necessary.



If a complaint cannot be resolved at the agency level, the individual will be informed of available options to escalate the matter to appropriate external entities in accordance with applicable requirements.

Data Security and Privacy

Protecting private information is an essential part of compliance. Venture Forthe, Inc. safeguards all client, caregiver, and employee information in line with HIPAA and Colorado data privacy laws. Records such as care plans, payroll documents, health screenings, and EVV logs are stored securely with access limited to authorized staff.

If a data breach occurs, Venture Forthe, Inc. will notify those affected promptly, as required by law. Everyone connected to the program is expected to respect confidentiality and report any suspected breaches immediately.

Compliance and Emergency Preparedness

Compliance also means being prepared for emergencies. Venture Forthe, Inc. maintains a written Emergency Preparedness and Disaster Response Plan as required by CDPHE regulations. This plan explains what to do in situations such as severe weather, natural disasters, power outages, or public health emergencies.

All employees, contractors, caregivers, clients, representatives, leadership, and any individuals participating in agency operations are expected to follow the procedures in the Emergency Preparedness Plan when emergencies occur. We will provide guidance on how to plan ahead and what to expect from Venture Forthe, Inc. during emergencies.

Corrective actions identified in audits are tracked until fully resolved. Progress is reviewed through established agency governance and oversight processes to make sure that issues do not repeat and improvements are sustained.

Auditing and Monitoring

The agency conducts internal monitoring and audit activities to assess compliance with applicable state and federal regulatory requirements. Reviews may include evaluation of operational, clinical, administrative, and compliance-related records and processes as appropriate.

Audit findings are documented, and corrective actions are implemented and tracked in accordance with agency procedures. Oversight results are reviewed through established agency governance processes and reported as required by applicable regulatory and governance standards.



Education and Training

The agency ensures that employees, contractors, caregivers, leadership, and other applicable personnel receive required compliance education and training in accordance with applicable state and federal regulatory requirements and agency procedures.

Clients and representatives receive information and orientation regarding their rights, responsibilities, and participation in services as applicable.

Cooperation with Investigations

Venture Forthe, Inc. cooperates fully with appropriate state and federal oversight authorities during audits, surveys, or investigations. Clients, representatives, caregivers, and agency staff are expected to cooperate honestly and promptly with any official inquiries.

Confidentiality and Record Retention

All records are retained for the period required by applicable law or longer as required. Records are stored securely with access limited to authorized staff. Keeping these records accurate and confidential ensures services can be verified and that privacy is respected.

Accessibility of Compliance Information

Venture Forthe, Inc. is committed to making this Compliance Plan and all related policies accessible to everyone. Copies are available in print, large print, and electronic formats. Translations or alternative versions can be provided upon request for individuals who are blind, visually impaired, deaf, hard of hearing, or whose primary language is not English.

Regulatory Authority

This Compliance Plan is based on the following state and federal requirements:

- Colorado Regulations
 - 10 CCR 2505-10 § 8.7000 et seq. — HCBS and IHSS Provider Standards
 - 6 CCR 1011-1, Chapter 2 — General Licensure Standards
 - 6 CCR 1011-1, Chapter 26 — Home Care Agency regulations
- Colorado Statutes
 - C.R.S. § 18-6.5-108 — Mandatory reporting of abuse, neglect, or exploitation of at-risk adults
 - Colorado Data Privacy and Breach Notification Act
 - Colorado Wage Act (C.R.S. § 8-4-101 et seq.)
- Federal Regulations
 - 42 CFR § 455 — Medicaid Program Integrity
 - 42 CFR § 438 Subpart F — Grievances and Appeals
 - 45 CFR Parts 160 and 164 — HIPAA Privacy and Security Rules
 - 31 U.S.C. §§ 3729–3733 — Federal False Claims Act



Additional regulations may apply depending on the services provided, payer source, waiver program, or licensure classification.

Commitment To Compliance

Compliance is a shared responsibility. All employees, contractors, caregivers, clients, representatives, leadership, and any individuals participating in agency operations share responsibility for protecting the integrity of services provided by the agency. By following this plan, Venture Forthe, Inc. ensures that services are delivered ethically, lawfully, and with respect for everyone involved.

Annual Review

This Compliance Plan is reviewed at least annually and updated as necessary to reflect applicable regulatory requirements. Approval and acknowledgment processes are managed in accordance with agency procedures.