



## **Georgia Corporate Compliance Plan**

Effective Date: 03/01/2026

Approved By: David Hogan, CEO

### **A Message from Leadership**

At Venture Forthe Home Care Inc., compliance is part of daily operations. It is not limited to audits, surveys, or billing reviews. Compliance includes how services are documented, how caregivers conduct themselves in client homes, how concerns are reported, how confidential information is protected, and how the agency responds when problems arise.

As a Georgia Personal Home Care Provider (PHCP), the agency is responsible for ensuring services are provided in a safe, ethical, and compliant manner. Home care services are provided in clients' homes throughout the community, often by caregivers working independently in the field. Because of this, the agency places significant importance on employee accountability, accurate documentation, communication, supervisory oversight, client safety, and professional conduct.

This Compliance Plan establishes the standards and expectations Venture Forthe Home Care Inc. expects employees, caregivers, contractors, administrators, and representatives of the agency to follow throughout its Georgia PHCP operations.

### **Purpose**

The purpose of this Compliance Plan is to establish clear expectations for ethical conduct, regulatory compliance, documentation standards, billing practices, client protections, employee accountability, and reporting responsibilities within Venture Forthe Home Care Inc.'s Georgia PHCP program.

The agency recognizes that compliance is an ongoing operational responsibility. Compliance involves employee training, documentation review, complaint investigation, supervisory oversight, incident reporting, payroll and billing practices, and monitoring of services provided in client homes.

This plan applies to all employees, caregivers, administrators, contractors, consultants, and individuals acting on behalf of Venture Forthe Home Care Inc. within the Georgia PHCP service line.

### **Regulatory and Legal Compliance**

Venture Forthe Home Care Inc. operates its Georgia PHCP services in accordance with applicable federal and Georgia laws, regulations, Medicaid requirements, and healthcare standards governing home care operations, Medicaid integrity, client rights, privacy protections, workplace safety, and documentation requirements.

The agency's compliance activities include adherence to Georgia Rules and Regulations for Personal Home Care Providers under Ga. Comp. R. & Regs. 111-8-65, HIPAA Privacy and Security Rules, the Federal False Claims Act, the Georgia False Medicaid Claims Act, the Georgia Taxpayer Protection False Claims Act, the Federal Anti-Kickback

Statute, Medicaid Program Integrity requirements under 42 CFR Part 455, the Americans with Disabilities Act (ADA), Section 1557 of the Affordable Care Act, Title VI of the Civil Rights Act of 1964, Georgia mandatory reporting requirements related to abuse, neglect, and exploitation of vulnerable adults, the Fair Labor Standards Act (FLSA), and OSHA workplace safety requirements applicable to home care services.

The agency monitors changes to Georgia PHCP regulations, Medicaid requirements, and healthcare guidance on an ongoing basis to help ensure agency policies, procedures, training, and operations remain compliant.

## **Ethical Standards and Professional Conduct**

Employees and caregivers are expected to conduct themselves professionally, honestly, respectfully, and ethically in all interactions involving clients, families, coworkers, referral sources, regulatory agencies, and the public.

Because services are provided in clients' homes, employees are expected to maintain professional boundaries, respect client privacy and personal property, follow care instructions and supervisory direction, and conduct themselves appropriately while representing the agency in the community. Employees are also expected to maintain accurate and timely documentation, protect confidential information, report concerns involving client safety or misconduct, and cooperate with audits, surveys, investigations, documentation reviews, and supervisory activities when necessary.

The agency prohibits abuse, neglect, exploitation, harassment, discrimination, retaliation, falsification of records, unauthorized disclosure of confidential information, misrepresentation of services, or any conduct that could compromise client safety, wellbeing, privacy, or trust.

Violations of agency policy, client rights, regulatory requirements, or accepted standards of conduct may result in disciplinary action up to and including termination of employment or referral to outside authorities when appropriate.

## **Fraud, Waste, and Abuse Prevention**

Venture Forthe Home Care Inc. expects all billing, payroll, scheduling, documentation, supervisory activities, and operational practices to accurately reflect the services provided.

Examples of prohibited conduct include billing for services not provided, falsifying visit notes or schedules, forging signatures, duplicate billing, altering documentation after services are completed, allowing unauthorized individuals to provide services, misrepresenting caregiver qualifications or training completion, improper Electronic Visit Verification (EVV) practices, failing to accurately document services provided in the client's home, or providing false or misleading information during audits, investigations, or surveys.

The agency also prohibits offering, soliciting, or accepting kickbacks, improper financial incentives, or inducements related to referrals or healthcare services.

Employees and caregivers are expected to immediately report suspected fraud, abuse, billing concerns, documentation concerns, or unethical conduct.

## **Whistleblower Protections and Non-Retaliation**

Venture Forthe Home Care Inc. encourages employees, caregivers, clients, families, and community members to report concerns involving suspected fraud, abuse, neglect, exploitation, unsafe practices, regulatory violations, or unethical conduct in good faith.



Individuals making good-faith reports are protected under applicable federal and state whistleblower protection laws, including protections established under the Federal False Claims Act (31 U.S.C. § 3730(h)) and the Georgia False Medicaid Claims Act.

The agency prohibits retaliation against individuals who report compliance concerns, participate in investigations, cooperate with regulatory reviews or government inquiries, report suspected abuse or misconduct, or refuse to participate in unlawful activity. Retaliation may include termination, demotion, intimidation, harassment, reduction in hours, threats, discrimination, or adverse treatment related to the individual making a report.

Reports may be made verbally, in writing, anonymously, or through agency reporting processes. The agency investigates concerns promptly and takes corrective action when necessary. Knowingly making false allegations or intentionally providing misleading information during an investigation may result in disciplinary action.

### **Employee Screening, Training, and Accountability**

Before providing services, employees must meet applicable agency and regulatory requirements related to qualifications, background screening, competency, orientation, and training.

The agency conducts employee screening and exclusion checks, including review of applicable federal and state exclusion databases such as OIG exclusion lists when required by law or program requirements.

Employees receive training and ongoing education related to HIPAA and confidentiality, fraud, waste, and abuse prevention, documentation standards, client rights, abuse and neglect reporting obligations, incident reporting procedures, infection control, workplace safety, EVV requirements, and professional conduct expectations.

Employees are individually responsible for maintaining compliance with agency policies, training expectations, documentation requirements, and regulatory standards applicable to their position.

### **Client Rights, Complaints, and Confidentiality**

Venture Forthe Home Care Inc. is committed to protecting the dignity, privacy, independence, and rights of clients receiving services.

Clients have the right to be treated with dignity and respect, participate in decisions involving their services, voice complaints or concerns without fear of retaliation, receive services free from abuse, neglect, exploitation, discrimination, coercion, or harassment, and have personal and medical information protected. Clients also have the right to receive services in a manner that respects privacy, individuality, routines, and personal property.

The agency investigates complaints, allegations of misconduct, and reported concerns involving client care, employee conduct, documentation, or service delivery. Employees and caregivers are expected to immediately report suspected abuse, neglect, exploitation, injuries, unsafe conditions, missed visits, or concerns affecting client safety.

Client information is maintained in accordance with HIPAA and applicable privacy requirements. Confidential information may only be accessed, used, or disclosed as permitted by law and agency policy.

### **Incident Reporting, Investigations, and Corrective Action**

The agency investigates allegations involving client safety concerns, abuse, neglect, exploitation, caregiver misconduct, privacy breaches, documentation concerns, billing irregularities, injuries, unsafe home situations, missed visits, and violations of agency policy.

The agency cooperates with Medicaid authorities, regulatory agencies, Adult Protective Services, auditors, surveyors, and law enforcement entities when required.

Depending on the situation, corrective actions may include additional training, increased supervision, documentation review, performance improvement measures, disciplinary action, policy revisions, repayment activities when required, or referral to outside authorities when appropriate.

### **Auditing, Monitoring, and Quality Oversight**

Venture Forthe Home Care Inc. conducts regular audits, documentation reviews, supervisory oversight activities, and compliance monitoring to help ensure services are provided in accordance with Georgia PHCP requirements and agency standards.

Monitoring activities may include review of personnel records, training records, client documentation, supervisory visit records, complaint investigations, incident reports, payroll and billing records, EVV documentation, and quality assurance activities.

Audit findings, complaint trends, incident patterns, and corrective action activities are reviewed to help identify operational concerns, documentation issues, training needs, and opportunities for improvement.

### **Commitment to Compliance**

Compliance is part of daily operations at Venture Forthe Home Care Inc. Employees, caregivers, and leadership are expected to follow agency policies, maintain accurate documentation, protect client rights, report concerns when issues arise, and conduct themselves professionally while providing services in client homes.

The agency is committed to providing safe, ethical, and compliant home care services throughout its Georgia PHCP operations.

### **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.