



Nevada Intermediary Service Organization Corporate Compliance Plan

Effective Date: 08/04/2025

Approved By: David Hogan, CEO

A Message from Leadership

At Venture Forthe, Inc., compliance is not just a requirement—it is a core part of how we operate and support self-directed care. Our mission is to empower individuals to manage their own personal care services while ensuring that every process we handle is transparent, ethical, and fully aligned with Nevada Medicaid and federal laws.

This Compliance Plan is for everyone connected to Venture Forthe, Inc.'s Nevada ISO PCS program: participants, Personal Care Representatives (PCRs), personal care attendants (PCAs), employees, and leadership. It sets forth how we prevent fraud, promote accountability, and protect the integrity of our services. Whether you are a participant managing your care, an attendant providing services, or an employee handling payroll and compliance tasks, this plan explains your rights, responsibilities, and how we work together to stay compliant.

Purpose

The purpose of this plan is to ensure that Venture Forthe, Inc. operates in full compliance with Nevada Medicaid and federal requirements while maintaining the highest standards of honesty, fairness, and ethical conduct. It establishes clear guidelines for preventing and addressing fraud, waste, and abuse; protecting participant information; handling complaints; conducting audits; and ensuring everyone—participants, PCAs, and employees—understands their role in maintaining Compliance.

Venture Forthe, Inc.'s Role

As an Intermediary Service Organization (ISO), Venture Forthe, Inc. serves as the Fiscal Employer Agent for participants in Nevada's self-directed Personal Care Services (PCS) program. This means:

- Participants or their PCRs are the employers of record for their PCAs.
- Venture Forthe, Inc. handles administrative and fiscal tasks only:
 - Payroll and tax processing
 - Background checks
 - Verification of required training and certifications
 - Electronic Visit Verification (EVV) compliance
 - Documentation required by Medicaid and DPBH

Venture Forthe, Inc. does not supervise or manage the day-to-day care provided by attendants. Participants and PCRs hire, train, schedule, and manage their PCAs. Our role is to ensure that the administrative side of self-directed care runs smoothly and meets every regulatory requirement.

Legal and Regulatory Framework

This plan is designed to comply with:

- Nevada Medicaid Services Manual (MSM), Chapter 2600 – Personal Care Services
- Division of Public and Behavioral Health (DPBH) ISO licensing standards
- Nevada False Claims Act (NRS 357)
- Federal False Claims Act (31 U.S.C. §§ 3729–3733)
- HIPAA Privacy and Security Rules (45 CFR Parts 160 and 164)
- 42 CFR § 455 – Medicaid Program Integrity
- 42 CFR § 438 Subpart F – Grievances and Appeals

Shared Rights and Responsibilities

Every participant, PCR, PCA, employee, and leader at Venture Forthe, Inc. has a role to play in compliance:

- Participants and PCRs have the right to self-direct their care, select and train attendants, and manage daily services. They must ensure that attendants meet program requirements and accurately report time worked.
- PCAs have the right to a safe workplace, fair pay, and the ability to report concerns without retaliation. They must work honestly, accurately record their hours, and follow Medicaid program rules.
- Employees and Leadership have the right to a safe, fair, and ethical workplace. They must handle payroll, taxes, documentation, and compliance matters accurately and report any suspected misconduct.

Together, all parties must protect participant information, follow program rules, and immediately report suspected fraud, waste, or abuse.

Preventing Fraud, Waste, and Abuse

Fraud undermines self-directed care and can result in loss of services or legal action. Examples include:

- Billing for hours not actually worked
- Falsifying timesheets or EVV entries
- Allowing attendants to clock in for others
- Mishandling or altering payroll records
- Employing attendants without required checks or training
- Misuse of Medicaid funds or documentation

Anyone connected to Venture Forthe, Inc.'s ISO PCS program—participants, PCAs, or employees—must immediately report suspected fraud or abuse. Reports can be made confidentially by phone, email, or anonymous hotline. Venture Forthe, Inc. strictly prohibits retaliation for good-faith reports.

Penalties for Fraud, Waste, and Abuse

Fraud, waste, and abuse are serious violations of federal and state law. Individuals who knowingly engage in fraudulent activity, including falsifying records, misusing Medicaid funds, or submitting false information, may be subject to disciplinary action by Venture Forthe, Inc., immediate termination of services or employment, and referral to law enforcement.

Under the Federal False Claims Act and the Nevada False Claims Act (NRS 357), civil penalties, financial restitution, and criminal prosecution may be pursued against any person who knowingly commits Medicaid fraud.

Whistleblower Protections

Federal and Nevada False Claims Acts protect individuals who report fraud or noncompliance. Anyone who lawfully raises a concern cannot be discharged, demoted, suspended, threatened, harassed, or discriminated against. These protections apply equally to participants, PCAs, employees, and leadership.

Reporting Channels

Concerns can be reported through:

- Phone: 702-518-7880
- Email: nevadaincidents@ventureforthe.com
- Mail: 1500 East Tropicana Avenue, Suite 238 Las Vegas, NV 89119
- Anonymous hotline or reporting system: 1-800-701-1233 x 121

Every report is documented, promptly investigated, and resolved in writing.

Complaint Process

Complaints from participants, PCRs, PCAs, employees, or leadership can be made verbally, in writing, by email, or anonymously. Each complaint is documented and logged. The Compliance Department reviews complaints within 10 business days, conducts necessary investigations, and issues written resolutions.

If unresolved, complainants are informed of their right to escalate the matter to their Medicaid Managed Care Organization or the Division of Health Care Financing and Policy (DHCFP).

Disciplinary Actions

Compliance violations are addressed proportionally:

- Counseling or retraining for first offenses
- Written warnings or suspension for repeated violations
- Termination and referral to authorities for severe violations or confirmed fraud

These actions apply to employees and attendants and may lead to participant disenrollment if compliance violations are not corrected.

Conflict of Interest

Conflicts of interest, such as undisclosed financial relationships or hiring close relatives without proper disclosure, must be avoided. Any potential conflicts must be reported immediately to the Compliance Officer.

Data Security and Privacy

Venture Forthe, Inc. protects all participant, attendant, and employee information under HIPAA and Nevada privacy laws. Payroll records, background checks, training documentation, and EVV data are stored securely with access limited to authorized staff. In case of a data breach, we provide prompt notifications as required by law.

Auditing and Monitoring

To ensure compliance:

- Quarterly audits are conducted on payroll, EVV entries, background checks, training completion, and complaint documentation.
- Audit results are documented and corrective actions are implemented.
- Findings are reviewed by the Compliance Committee and reported to leadership.

Education and Training

Compliance education is mandatory for all employees, participants, and PCAs. It is provided during onboarding and annually thereafter, covering:

- Nevada Medicaid PCS rules
- ISO roles and responsibilities
- Fraud, waste, and abuse prevention
- HIPAA and privacy protections
- Whistleblower rights
- Complaint handling and reporting

Venture Forthe, Inc. maintains a training tracker to ensure that every individual has completed the required compliance training.

Cooperation with Investigations

Venture Forthe, Inc. cooperates fully with Nevada Medicaid, DPBH, and federal authorities during audits or investigations. Participants, PCAs, employees, and leadership must cooperate honestly and promptly with official inquiries related to PCS administration or compliance.

Confidentiality and Record Retention

Records including payroll, background checks, training documentation, and complaints are retained for at least six years or longer if required by law. Records are securely stored and only accessed by authorized personnel.

Commitment to Compliance

Compliance is a shared responsibility. Every participant, PCA, employee, and leader contributes to the ethical and lawful operation of Venture Forthe, Inc.'s ISO PCS program. Through education, open communication, proactive auditing, and strict adherence to legal protections, we ensure the program remains transparent and trustworthy.

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.