



Nevada PCS Agency Corporate Compliance Plan

Effective Date: 03/12/2026

Approved By: David Hogan, CEO

Message from Leadership

At Venture Forthe, Inc., compliance is a fundamental part of how we operate and provide services. Our agency is committed to delivering safe, reliable personal care services while following all Nevada Medicaid requirements, federal healthcare laws, and state licensing regulations.

This Compliance Plan explains how Venture Forthe, Inc. ensures that services are delivered honestly, ethically, and in accordance with all program rules. Compliance is not only the responsibility of leadership. Every employee, personal care attendant, and administrator plays an important role in maintaining the integrity of the services we provide.

By maintaining strong policies, providing education and training, and encouraging open communication, Venture Forthe, Inc. works to ensure that participants receive high-quality services in a respectful and transparent environment.

Purpose

The purpose of this Compliance Plan is to ensure that Venture Forthe, Inc. operates in full compliance with Nevada state law, Nevada Medicaid program requirements, and applicable federal regulations governing Personal Care Services.

This plan establishes the framework through which the agency promotes ethical conduct, prevents fraud and abuse, protects participant information, and ensures that services are delivered in accordance with authorized care plans and regulatory standards. It also provides guidance to employees and personal care attendants regarding their responsibilities for maintaining compliance in their daily work.

This Compliance Plan applies to all administrators, employees, contractors, and personal care attendants working under Venture Forthe, Inc.'s Nevada PCS Agency.

Legal and Regulatory Framework

Venture Forthe, Inc. operates its Nevada Personal Care Services Agency in accordance with state and federal laws governing healthcare providers and Medicaid services. These laws establish standards for licensing, service delivery, billing practices, participant protections, and confidentiality of healthcare information.

The agency complies with all applicable Nevada statutes governing medical facility licensing and Personal Care Services agencies, the Nevada Medicaid Services Manual provisions for Personal Care Services, and federal program integrity regulations. The agency also follows the requirements of the Federal and Nevada False Claims Acts and the privacy and security provisions established under the Health Insurance Portability and Accountability Act (HIPAA).

Venture Forthe, Inc. monitors regulatory updates and revises agency policies and procedures when necessary to ensure continued compliance with all governing authorities.

Agency Role and Responsibilities

As a licensed Personal Care Services Agency in Nevada, Venture Forthe, Inc. is responsible for delivering and overseeing personal care services provided to participants in their homes.

The agency employs qualified personal care attendants and ensures that services are provided safely and in accordance with the participant's authorized plan of care. The agency also maintains responsibility for assigning caregivers, monitoring service delivery, maintaining documentation, and ensuring that services comply with Nevada Medicaid requirements.

Agency responsibilities include:

- hiring qualified personal care attendants
- verifying background checks and required training
- assigning attendants to participants
- supervising service delivery
- maintaining accurate documentation and service records
- ensuring compliance with Electronic Visit Verification (EVV) requirements
- monitoring service quality and participant safety
- reporting incidents as required by law

Personal care attendants provide services directly to participants under the supervision of the agency and must follow all program rules and agency policies.

Participant Rights

Venture Forthe, Inc. believes that every participant deserves to receive services with dignity, respect, and compassion. The agency is committed to protecting the independence, safety, and well-being of every individual receiving care.

Participants have the right to receive services in a safe environment, to participate in decisions related to their care, and to be treated with respect at all times. Participants are also entitled to receive services free from abuse, neglect, or exploitation and to have their personal and medical information kept confidential.

Participants have the right to communicate openly with agency staff regarding their care needs, service preferences, and any concerns that may arise. Venture Forthe, Inc. maintains procedures that allow participants to submit complaints or concerns without fear of retaliation.

Participant Responsibilities

Participants play an important role in helping services run safely and smoothly. While the agency is responsible for employing and supervising personal care attendants, participants are expected to cooperate with the agency and communicate openly about their care.

Participants are responsible for:

- communicating with the agency about care needs and service schedules
- informing the agency of changes in health status or living arrangements
- maintaining a safe home environment for attendants to provide services
- maintaining homeowner's or renter's insurance coverage when applicable
- notifying the agency of accidents or incidents that occur during services
- being present during scheduled services or making appropriate arrangements
- avoiding requests for services outside the authorized care plan
- treating attendants and agency staff with respect

Working together helps ensure that services remain safe, consistent, and compliant with program requirements.

Prevention of Fraud, Waste, and Abuse

Venture Forthe, Inc. maintains strict standards designed to prevent fraud, waste, and abuse in all aspects of service delivery and Medicaid billing.

Fraud, waste, and abuse may occur when services are billed but not provided, when documentation is falsified, or when services are delivered outside the authorized plan of care. Such conduct violates federal and state law and undermines the integrity of the Medicaid program.

Examples of prohibited conduct include:

- billing for services that were not provided
- falsifying service documentation or visit records
- billing outside authorized service hours
- providing services without a valid care plan
- allowing unqualified individuals to provide services
- submitting false information to Medicaid

Individuals who knowingly participate in fraudulent activity may be subject to disciplinary action, termination, and referral to appropriate authorities.

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 Concerns or Complaints

Venture Forthe, Inc. encourages participants, family members, personal care attendants, and employees to report concerns regarding services, safety, fraud, or possible violations of agency policy.

Reports may be made using any of the following methods:

- 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

Reports may be submitted confidentially or anonymously. Venture Forthe, Inc. strictly prohibits retaliation against individuals who report concerns in good faith.

All reports are documented, reviewed promptly, and investigated when necessary.

If a concern cannot be resolved through the agency's internal complaint process, participants may also contact their Medicaid Managed Care Organization or the Nevada Division of Health Care Financing and Policy.

Complaint Investigation

Complaints related to services, staff conduct, or agency operations are taken seriously and reviewed promptly by agency leadership.

Each complaint is documented, reviewed, and investigated as necessary to determine appropriate corrective action. When possible, the agency provides written responses outlining the resolution of the complaint.

The agency works to resolve concerns quickly and fairly while protecting the rights and safety of all individuals involved.

Auditing and Monitoring

To ensure compliance with regulatory requirements and agency policies, Venture Forthe, Inc. conducts ongoing monitoring activities. These activities include reviewing participant care plans, verifying Electronic Visit Verification records, auditing personnel files, confirming required training completion, reviewing incident reports, and monitoring complaints and resolutions.

When deficiencies are identified, the agency implements corrective actions designed to address the issue and prevent recurrence. Compliance findings are reviewed by agency leadership to support continuous improvement and accountability.

Education and Training

Education and training are essential components of the agency's compliance program. Venture Forthe, Inc. provides compliance training to all employees and personal care attendants during orientation and on an annual basis thereafter.

Training topics include:

- Nevada Medicaid Personal Care Services requirements
- participant rights and protections
- fraud, waste, and abuse prevention
- documentation standards
- HIPAA privacy and confidentiality
- incident reporting procedures
- emergency preparedness

Training completion is documented and monitored by the agency.

Cooperation with Government Investigations

Venture Forthe, Inc. cooperates fully with lawful investigations, audits, and reviews conducted by regulatory and governmental authorities. This includes cooperation with state licensing agencies, Nevada Medicaid authorities, managed care organizations, and federal oversight entities.

Employees are expected to respond honestly and promptly to requests for information related to agency operations or service delivery.

Confidentiality and Data Protection

Venture Forthe, Inc. maintains strict safeguards to protect confidential participant and employee information. All protected health information and sensitive data are handled in accordance with HIPAA privacy and security regulations.

Records are stored securely and access is limited to authorized personnel whose job duties require such access. Any suspected breach of confidential information is investigated and reported as required by law.

Record Retention

The agency maintains records in accordance with Nevada Medicaid and federal record retention requirements. Participant records, personnel files, billing documentation, training records, and compliance documentation are retained for a minimum of six years or longer when required by law.

Maintaining complete records allows the agency to demonstrate compliance and respond appropriately to audits or investigations.

Statutory Compliance and Liability Coverage

Venture Forthe, Inc. maintains the insurance coverage and financial responsibility required to operate as a licensed Personal Care Services Agency in Nevada. Documentation verifying liability insurance coverage and compliance with applicable statutory financial responsibility requirements is maintained by the agency and made available to regulatory authorities upon request.

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.