



**BLUE WATER
DEVELOPMENTAL
HOUSING INC.**

Inspiring. Individual. Independence.

FY 2026 Corporate Compliance Plan

ABSTRACT

This Corporate Compliance Plan outlines Blue Water Developmental Housing, Inc.'s commitment to adhering to federal and state laws, including the False Claims Act, Anti-Kickback Statute, Stark Law, HIPAA, Michigan Medicaid False Claims Act, Michigan Mental Health Code (including Recipient Rights), and the Michigan Public Health Code. The plan establishes guidelines for ethical conduct, legal compliance, and protection of individual rights, ensuring high-quality care and services for adults with developmental disabilities. Through comprehensive training, regular audits, and strict oversight, Blue Water Developmental Housing, Inc. aims to foster a culture of accountability, transparency, and integrity in promoting the dignity and inclusion of the individuals it serves.



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Mission Statement

Blue Water Developmental Housing, Inc. is dedicated to providing housing and support services to adults with developmental disabilities, focusing on the desires and needs of the individuals served. Our services recognize the dignity of the individual, promote community inclusion, and are guided by principles of respect, choice, and empowerment.

Purpose of the Corporate Compliance Plan

The purpose of this Corporate Compliance Plan is to ensure that Blue Water Developmental Housing, Inc. complies with all applicable federal, state, and local laws, regulations, and ethical standards. This plan is designed to prevent, detect, and address instances of non-compliance, fraud, abuse, and ethical violations within the organization, safeguarding both the integrity of the services provided and the rights of those served.

Scope

This Corporate Compliance Plan applies to all employees, board members, contractors, and affiliates of Blue Water Developmental Housing, Inc.

Standards of Conduct

All employees, volunteers, contractors, and affiliates are expected to conduct themselves in an ethical and legal manner that upholds the mission of Blue Water Developmental Housing, Inc. to provide person-centered care and promote community inclusion. The organization will promote:

- **Respect for Dignity:** All interactions with individuals with developmental disabilities will respect their dignity and rights.
- **Community Inclusion:** Services will be designed to promote social and community inclusion for all individuals.
- **Transparency:** Compliance with all legal, regulatory, and ethical standards will be upheld, and transparent communication will be maintained within the organization.

Legal and Regulatory Compliance

To ensure compliance with applicable laws and regulations, Blue Water Developmental Housing, Inc. adheres to the following:



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False Claims Act (FCA)

- **Provisions:** The False Claims Act prohibits the submission of false or fraudulent claims for payment to the government, including Medicaid and Medicare.
- **Compliance Efforts:** Blue Water Developmental Housing, Inc. will ensure all billing and documentation are accurate, reflecting the services provided. Regular audits will be conducted to prevent and detect potential violations. Employees will be trained to identify and report any activities that may violate the FCA.

Anti-Kickback Statute (AKS)

- **Provisions:** The Anti-Kickback Statute prohibits the exchange of anything of value in return for referrals of services that are payable by federal healthcare programs, including Medicaid and Medicare.
- **Compliance Efforts:** Blue Water Developmental Housing, Inc. will not offer, solicit, or accept any payments or incentives for referrals or for the provision of services. The organization will implement training for all staff to ensure they understand and comply with the Anti-Kickback Statute.

Self-Referral Prohibitions (Stark Law)

- **Provisions:** The Stark Law prohibits physicians from referring patients to entities with which they have a financial relationship, for services covered by Medicaid or Medicare.
- **Compliance Efforts:** Blue Water Developmental Housing, Inc. will avoid any financial relationship that could result in self-referrals, and the Compliance Officer will review any potential financial relationships for compliance with the Stark Law.

Health Insurance Portability and Accountability Act (HIPAA)

- **Provisions:** HIPAA requires the protection of individuals' personal health information (PHI) and sets standards for privacy and security.
- **Compliance Efforts:** Blue Water Developmental Housing, Inc. will implement safeguards to ensure the confidentiality, integrity, and availability of PHI. Staff will be trained in HIPAA requirements, and regular audits will be conducted to ensure compliance.

Michigan Medicaid False Claims Act

- **Provisions:** This law prohibits knowingly submitting false claims or engaging in fraudulent practices involving Medicaid in Michigan.



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- **Compliance Efforts:** Blue Water Developmental Housing, Inc. will ensure all Medicaid claims are accurate and properly documented. Staff will be trained to recognize fraudulent activities and report any concerns to the Administrative Services Division Director.

Michigan Mental Health Code, Including Recipient Rights

- **Provisions:** The Michigan Mental Health Code sets forth the rights of recipients of mental health services, including those with developmental disabilities. This includes the right to dignity, privacy, treatment suited to individual needs, and protection from abuse or neglect.
- **Compliance Efforts:** Blue Water Developmental Housing, Inc. will fully uphold the rights of individuals served as outlined in the Michigan Mental Health Code. Staff will receive training in these rights, and any violations will be promptly investigated and reported.

Michigan Public Health Code

- **Provisions:** The Michigan Public Health Code regulates the delivery of health services in the state and ensures that individuals receive care that meets public health standards.
- **Compliance Efforts:** Blue Water Developmental Housing, Inc. will ensure that all services provided with the Michigan Public Health Code, including maintaining appropriate licensure, adhering to health standards, and following public health guidelines.

Americans with Disabilities Act (ADA)

- **Provisions:** The ADA prohibits discrimination against individuals with disabilities in all areas of public life, including employment, housing, transportation, and access to public and private services. It ensures equal opportunities and reasonable accommodations for persons with disabilities.
- **Compliance Efforts:** Blue Water Developmental Housing, Inc. will ensure all facilities, services, and employment practices are fully accessible and ADA-compliant. This includes implementing reasonable accommodations for residents and staff, training employees on ADA requirements, and eliminating physical, communication, or policy barriers to access.

Occupational Safety and Health Administration (OSHA) Regulations

- **Provisions:** OSHA establishes standards to ensure safe and healthful working conditions by setting and enforcing regulations and providing training, outreach, education, and assistance.
- **Compliance Efforts:** Blue Water Developmental Housing, Inc. will implement OSHA safety standards across all facilities. This includes maintaining safe environments, providing PPE as needed, conducting regular safety drills, keeping updated Safety Data Sheets (SDS), training



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staff in hazard communication and infection control, and maintaining accurate records of workplace injuries and incidents.

Michigan Department of Health and Human Services (MDHHS) and Michigan Department of Licensing and Regulatory Affairs (LARA) Regulations

- **Provisions:** MDHHS and LARA establishes standards which govern the operation of residential and support services for individuals with developmental disabilities. It establishes service delivery requirements, staffing ratios, incident reporting, and quality improvement standards.
- **Compliance Efforts:** Blue Water Developmental Housing, Inc. will participate in required inspections and audits and implement MDHHS and LARA directives and quality improvement initiatives. Blue Water Developmental Housing, Inc. will maintain current licensure through LARA and adhere to its rules regarding staffing, training, health and safety, rights protections, and critical incident reporting.

Commission on Accreditation of Rehabilitation Facilities (CARF)

- **Provisions:** CARF is an independent accrediting body that establishes quality standards for organizations providing rehabilitation and human services. It emphasizes person-centered care, continuous improvement, accountability, and stakeholder feedback.
- **Compliance Efforts:** Blue Water Developmental Housing, Inc. will adhere to CARF accreditation standards by maintaining documented policies and procedures, engaging in regular performance measurement and quality improvement, seeking input from clients and families, and ensuring services are individualized, culturally competent, and outcome focused. The organization will complete self-assessments and participate in external CARF surveys.

Corporate Compliance Officer (CCO)

The Administrative Services Division Director will serve as the Corporate Compliance Officer for Blue Water Developmental Housing, Inc. The Administrative Services Division Director will be responsible for overseeing the implementation, monitoring, and enforcement of this Corporate Compliance Plan, including the following:

- **Develop and Implement Policies:** Establish and maintain compliance related policies and procedures.
- **Training and Education:** Provide compliance and ethics training to all staff, volunteers, and contractors.



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- **Monitoring and Auditing:** Regularly audit organizational practices to ensure compliance with legal, regulatory, and ethical standards.
- **Reporting and Investigation:** Investigate reported incidents of non-compliance and ensure corrective actions are taken promptly.

You can reach the Administrative Services Division Director by calling (810) 388-1200.

Education and Training

All staff and contractors will receive comprehensive education and training on the following:

- Code of Ethics
- Recipient Rights
- Slips, Trips, and Falls
- HIPAA
- Cyber Security
- Cultural Diversity
- Dignity and Respect
- Corporate Compliance
- Proper Lifting Techniques
- False Claims Act
- Anti-Kickback Statute
- Americans with Disabilities Act (ADA)
- Michigan Medicaid False Claims Act

All board members will receive training on the following:

- Code of Ethics
- Introduction to Recipient Rights
- HIPAA
- Cyber Security
- Cultural Diversity
- Dignity and Respect
- Corporate Compliance
- Anti-Kickback Statute
- Americans with Disabilities Act
- False Claims Act
- Michigan Medicaid False Claims Act

Reporting and Whistleblower Protections

- **Reporting Non-Compliance:** All employees, volunteers, board members, and contractors are required to report any known or suspected non-compliance or ethical violations. Reports can be made directly to the Administrative Services Division Director.
- **Whistleblower Protections:** No individual will face retaliation for reporting, in good faith, a violation or potential violation of this Corporate Compliance Plan. All reports will be investigated promptly and confidentially.

Auditing and Monitoring

Blue Water Developmental Housing, Inc. will conduct regular audits and monitoring to ensure compliance with all relevant laws and internal policies, including:



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- **Internal Audits:** Review billing practices, adherence to recipient rights, and compliance with state and federal laws.
- **External Audits:** Subject to audits by state and federal agencies, with full cooperation from Blue Water Developmental Housing, Inc.

Disciplinary Guidelines

Violations of this Corporate Compliance Plan or any applicable laws and regulations will result in disciplinary action, which may include:

- Verbal or written warnings
- Mandatory retraining or education
- Suspension or termination of employment or contract
- Reporting to the appropriate regulatory or legal authorities, if necessary.

Conflict of Interest

All employees, board members, volunteers, and contractors must avoid conflicts of interest. This includes:

- **Financial Interests:** Employees and affiliates must not have financial interest in services or entities with which they are involved professionally.
- **Disclosure:** Any potential conflict of interest must be disclosed to the Administrative Services Division Director or Executive Director.

Record Keeping

Blue Water Developmental Housing, Inc. will maintain thorough and accurate records in the following areas:

- **Service Delivery:** Accurate documentation of all services provided to individuals with developmental disabilities.
- **Financial Records:** Proper documentation of all billing and financial transactions to ensure accuracy and compliance with the False Claims Act and other applicable laws.
- **Compliance Activities:** Documentation of compliance activities, including audits, training and investigations.



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Plan Review and Updates

This Corporate Compliance Plan will be reviewed annually, or more frequently as necessary, to ensure it remains current with legal, regulatory, and organizational changes.

Conclusion

Blue Water Developmental Housing, Inc. is committed to upholding the highest standards of legal compliance and ethical behavior in providing services to individuals with developmental disabilities. By implementing this Corporate Compliance Plan, we ensure our mission is fulfilled with integrity and in full compliance with all applicable laws and regulations.