

## **CENTER FOR FAMILY SUPPORT, INC.**

### **CORPORATE COMPLIANCE POLICY OVERVIEW**

#### **I. Policy**

It has been and continues to be the policy of The Center for Family Support (CFS) to comply with all applicable federal, state, and local laws and regulations, and payer requirements. It is also the policy of CFS to adhere to the Code of Conduct / Conflicts of Interest Policy that is adopted by the Board of Directors, the Executive Director, and the Corporate Compliance Committee.

#### **II. Commitment**

The Center for Family Support has always been and will remain committed to our responsibility to conduct our business affairs with integrity based on sound ethical and moral standards. We will hold our employees, contracted practitioners, and vendors to these same standards.

The Center for Family Support is committed to maintaining and measuring the effectiveness of our Compliance policies and standards through monitoring and auditing systems reasonably designed to detect noncompliance by its employees and agents. We shall require the performance of regular, periodic compliance audits by internal and/or external auditors who have expertise in federal and state health care statutes, regulations, and health care program requirements.

The Center for Family Support Executive Director has appointed an agency Sr. Staff member to be the agency Corporate Compliance Officer (CCO) to design, implement and monitor the agency Corporate Compliance Plan in concert with the executive personnel, other Sr. Management staff and the CFS Board of Directors. The Corporate Compliance Officer will report findings from all internal audits and investigations to the CFS Corporate Compliance Committee. Members of this committee will be appointed by the Board of Directors. The Executive Director in concert with the Board of Directors will appoint another qualified person with sufficient and appropriate finance experience, knowledge and credentials to audit and review agency financial records and procedures. This person will report all findings to the full Board of Directors.

#### **III. Responsibility**

All employees, contracted practitioners, and vendors shall acknowledge that it is their responsibility to report any instances of suspected or known noncompliance to their immediate supervisor, the Executive Director or the Corporate Compliance Officer. Reports may be made anonymously without fear of retaliation or retribution. Failure to report known noncompliance or making reports which are not in good faith will be grounds for disciplinary action, up to and including termination. Reports related to harassment or other workplace-oriented issues will be referred to Human Resources.

#### **IV. Policies and Procedures**

The Center for Family Support will communicate its compliance standards and policies through required training initiatives to all employees, contracted practitioners, and vendors. The Center for Family Support is committed to these efforts through distribution of this Corporate Compliance Policy and our Code of Conduct/ Conflicts of Interest policy.

#### **V. Enforcement**

This Corporate Compliance Policy will be consistently enforced through appropriate disciplinary mechanisms including, if appropriate, discipline of individuals responsible for failure to detect and/or report noncompliance.

#### **VI. Agency Response**

Detected noncompliance, through any mechanism, i.e., compliance auditing procedures and/or confidential reporting, will be responded to in an expedient manner. The Center for Family Support is dedicated to the resolution of such matters and will take all reasonable steps to prevent further similar violations, including any necessary modifications to the Corporate Compliance Plan.

#### **VII. Due Diligence**

The Center for Family Support will, at all times, exercise due diligence with regard to background and professional license investigations for all prospective employees, contractors, vendors, and members of the Board of Directors.

#### **VIII. Whistleblower Provisions and Protections**

The Center for Family Support will not take any retaliatory action against an employee if the employee discloses certain information about CFS policies, practices, or activities to a regulatory, law enforcement, or other similar agency or public official. Protected disclosures are those that assert that CFS is in violation of a law that creates a substantial and specific danger to the public health and safety or which constitutes health care fraud under the law or that assert that, in good faith, the employee believes constitute improper quality of consumer care.