

**Policy and Procedure: Corporate Compliance**  
**Topic: Reporting of Compliance Concerns and Non-Retaliation**

**SCOPE OF POLICY**

This policy applies to all of The Center for Family Support (CFS) employees, including trainees, volunteers, consultants, contractors or subcontractors as well as The Board of Directors.

**STATEMENT OF PURPOSE**

The Center for Family Support (CFS) recognizes that a critical aspect of its corporate compliance program is the establishment of a culture that promotes prevention, detection, and resolution of instances of conduct that do not conform to federal and state requirements, as well as the organization's ethics and business policies.

To promote this culture, The Center for Family Support has established a corporate compliance reporting process and a strict non-retaliation policy to protect employees and others who report problems and concerns in good faith. Any form of retaliation or retribution can undermine the compliance resolution process and result in a failure of communication channels in the organization.

**STATEMENT OF POLICY**

All employees have an affirmative duty and responsibility for promptly reporting any known or suspected misconduct, including actual or potential violations of laws, regulations, policies, procedures, The Center for Family Support's Corporate Compliance Plan or Code of Conduct & Conflict of Interest policy. The "open-door policy" will be maintained at all levels of management to encourage employees to report problems and concerns.

CFS will maintain a Corporate Compliance / Whistleblower Hotline. Employees may report their corporate compliance concerns confidentially and anonymously to the Corporate Compliance Officer through use of the Corporate Compliance / Whistleblower Hotline either via telephone or internet. Concerns may also be reported to executive staff and/or the Director of Human Resources.

Any form of retaliation against any employee who reports a perceived problem or concern, in good faith, is strictly prohibited. Any employee who commits or condones any form of retaliation will be subject to disciplinary actions up to, and including, termination. Employees cannot exempt themselves from the consequences of their own misconduct by reporting the issue, although self-

reporting may be taken into account in determining the appropriate course of action.

## **IMPLEMENTATION OF POLICY**

### **A. Procedures that apply to all employees:**

1. Knowledge of misconduct, including actual or potential violations of laws, regulations, policies, procedures, or the organization's Code of Conduct & Conflict of Interest Policy, must be immediately reported to management, Director of Human Resources, the Compliance Officer, or the Corporate Compliance / Whistleblower Hotline at (888) 206-0027. A report may also be filed with the internet-based reporting system at [www.ethicspoint.com](http://www.ethicspoint.com). Ethicspoint will generate a report that will be forwarded to the CFS Executive Director, CFS Director of Human Resources, CFS Corporate Compliance Officer and a member of the Board of Directors. Should the complaint involve any of these persons, he/she will be excluded as a report recipient.
2. Employees have the same reporting obligations for actual or suspected violations committed by the Agency's vendors or subcontractors.
3. Confidentiality will be maintained to the extent that is practical and allowable by law. Employees should be aware that CFS is legally required to report certain types of crimes or potential crimes and infractions to governmental agencies.
4. Employees may report their corporate compliance concerns confidentially and anonymously to the Corporate Compliance/Whistleblower Hotline. Callers should be aware, however, that it may not be possible to preserve anonymity if they identify themselves, provide other information that identifies them, the investigation reveals their identity, or if they inform others that they have called the Corporate Compliance / Whistleblower Hotline.
5. If the caller wishes to make the report anonymously to the Compliance Hotline, no attempt will be made to trace the source of the call or identify of the person making the call.
6. The Corporate Compliance/Whistleblower Hotline number, as well as contact information for the Corporate Compliance Officer and executive personnel will be distributed during all corporate compliance trainings and new employee orientation.
7. CFS will not impose any disciplinary or other action in retaliation against individuals who make a report or complaint in good faith regarding a practice that the individual believes may violate The Center for Family Support's Corporate Compliance Plan, Code of Conduct & Conflict of Interest Policy, or any of the laws, rules or regulations by which The Center for Family Support is governed. "Good faith" means that the individual believes that the potential violation actually occurred as he or she is actually reporting.

8. CFS strictly prohibits its employees from engaging in any act, conduct or behavior which results in, or is intended to result in, retaliation against any employee for reporting his or her concerns relating to a possible violation of The Center for Family Support's Corporate Compliance Plan, Code of Conduct & Conflict of Interest Policy, or any of the laws, rules or regulations by which The Center for Family Support is governed.
9. If an employee believes in good faith that he has been retaliated against for reporting a corporate compliance complaint or concern or for participating in any investigation of such a report or complaint, the employee should immediately report the retaliation to the Corporate Compliance Officer or to the Human Resources Director. The report should include a thorough account of the incident(s) and should include the names, dates and specifics events, the names of any witnesses and the location or name of any document that supports the alleged retaliation.
10. Knowledge of a violation or potential violation of this policy, or other such policies must be reported directly to the Corporate Compliance Officer or the Corporate Compliance / Whistleblower Hotline.

**B. Procedures that apply to management (which includes executives, directors, managers, and supervisors):**

1. Any member of management who receives a report of a violation or suspected violation will immediately notify the Corporate Compliance Officer.
2. Management must take appropriate measures to ensure that all levels of management support this policy and encourage the reporting of problems and concerns. At a minimum, the following actions should be taken and become an ongoing aspect of the management process:
  - Meet with department staff and discuss the main points within this policy; and
  - Provide all department staff with a copy of this policy.

**C. Procedures that apply to the Corporate Compliance Officer:**

1. The Corporate Compliance Officer will determine the scope of the reported issue and make a determination regarding the course of action, including the investigation process and notifications to be made. (Refer to Investigation of Compliance Issues Policy.)
2. The Corporate Compliance Officer in concert with the Director of Human Resources will be responsible for the investigation and follow-up of any

reported retaliation against an employee for reporting a compliance concern or participating in the investigation of a compliance concern.

3. The Corporate Compliance Officer in concert with the Director of Human Resources will report the results of an investigation into suspected retaliation to the Executive Director and the Corporate Compliance Committee.

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

### **CONTACTS TO REPORT CORPORATE COMPLIANCE ISSUES**

1. CFS Corporate Compliance Officer / Quality Assurance Director / HIPAA Privacy Officer:  
Ms. Eileen Berg  
Center for Family Support, Inc.  
333 Seventh Avenue, 9<sup>th</sup> Floor  
New York, New York 10001  
212-629-7939 Ext. 215
  
2. CFS Director of Human Resources:  
Ms. Sharon Lax  
Center for Family Support, Inc.  
333 Seventh Avenue, 9<sup>th</sup> Floor  
New York, New York 10001  
212-629-7939 Ext. 297
  
3. CFS Associate Executive Director  
Ms. Barbara Greenwald  
Center for Family Support, Inc.  
333 Seventh Avenue, 9<sup>th</sup> Floor  
New York, New York 10001  
212-629-7939 Ext. 281
  
4. CFS Executive Director:  
Mr. Steven Vernikoff  
Center for Family Support, Inc.  
333 Seventh Avenue, 9<sup>th</sup> Floor  
New York, New York 10001  
212-629-7939 Ext. 213
  
5. Ethics Point Telephone & Internet Based Reporting System:
  - This allows for anonymous / whistleblower reporting:
    - a. The toll free hotline number: 1-888-206-0027
    - b. The Internet Access site is [www.ethicspoint.com](http://www.ethicspoint.com), click on “File a New Report” and follow on-screen instructions.

## Center for Family Support, Inc. Compliance Issue Log

#	Date Received	Source	Type	Program	Summary	Date Resolved	Disposition	Date of Administrative Review

- Type of Report:**  
Documentation Issue  
Billing Issue  
Missing Funds  
HIPAA/Confidentiality  
Human Resource Issue  
Alleged Retaliation  
Violation of Code of Conduct  
Violation of Conflict of Interest  
Other

- Source:**  
Supervisor  
Other Staff  
Other Provider  
Consumer  
Anonymous letter  
Anonymous Call  
Hotline  
Other