

Policy and Procedure: Corporate Compliance
Topic: Role and Responsibilities of the Corporate Compliance
Committee

SCOPE OF POLICY

This policy applies to The Corporate Compliance Officer, The Corporate Compliance Committee as well as the Executive Director and the Board of Directors of The Center for Family Support.

STATEMENT OF PURPOSE

The Center for Family Support (CFS) is committed to the operation of an effective corporate compliance program. Therefore, CFS established the Corporate Compliance Committee to monitor results of the corporate compliance functions and determine CFS' strategy for promoting compliance.

STATEMENT OF POLICY

The Corporate Compliance Committee is appointed by the President of the Board of Directors to advise and assist the Corporate Compliance Officer with the implementation of the Corporate Compliance Plan. The Corporate Compliance Officer will meet with The Corporate Compliance Committee on a regular and routine basis. The Corporate Compliance Officer will record and maintain minutes of all meetings, which will reflect discussions of corporate compliance activities.

IMPLEMENTATION OF POLICY

A. The Corporate Compliance Committee shall be comprised of members of the Board of Directors. Other CFS personnel may attend from time to time as deemed necessary to participate in discussions, design systems or remedial actions, and/or be consulted on current policies, laws and regulations. This may include, but is not limited to the Corporate Compliance Officer, Assistant Executive Director, Associate Executive Director, Director of Finance, Controller, Director of Human Resources, Quality Assurance personnel, and Department Director(s).

B. The Corporate Compliance Committee shall be responsible for the following:

1. Analyze the regulatory environment where CFS does business, including legal requirements in which it must comply;

2. Review and assess existing policies and procedures that address risk areas for possible incorporation into the Corporate Compliance Plan;
3. Work with the Corporate Compliance Officer and Department Directors to develop standards, policies and procedures that address specific risk areas and to encourage compliance according to legal and ethical requirements;
4. Review internal systems and controls with the Corporate Compliance Officer used to carry out corporate compliance standards, policies and procedures as well as monitor internal and external audits to identify potential non-compliant issues;
5. Review findings and results of periodic internal audits conducted of billable services compared to billing summaries and billing claims to ensure that only services rendered are billed for by CFS. A sample size and sample criteria designed by the Corporate Compliance Officer will be used during the audits and all review tools used will be standardized throughout The Center for Family Support.
6. Assess and oversee the implementation of adequate corrective and preventative action plans and follow-up to determine effectiveness; and
7. Oversee the CFS process in place to solicit, evaluate and respond to complaints and problems.