

# THE CENTER FOR DISCOVERY

SUBJECT: Role & Responsibilities of the Corporate Compliance Officer	MANUAL: Corporate Compliance
	SECTION: Section 2

## Purpose:

To appoint a Corporate Compliance Officer who will serve as the focal point for compliance activities and be responsible for the oversight of the development, implementation and daily operation of the Center for Discovery's Corporate Compliance program.

## Policy:

1. The Corporate Compliance Officer's (CCO) primary responsibility is the design, implementation and effective operation of the Corporate Compliance program.
2. In carrying out the policy and responsibilities of the office, the CCO shall:
3. Report independently to the CEO and to the Board of Directors. Have authority to investigate compliance violations and act as needed
4. Have access to all needed information, including contracts, billing records, and contractual arrangements
5. The Governance and Corporate Compliance / Committee of the Board of Directors will provide oversight of the CCO's activities.
6. The CCO will report on a quarterly and annual basis to the CEO and the Board Governance and Corporate Compliance Committee, on the progress of implementation of the Corporate Compliance program.

## Procedure:

As part of his / her duties, the Corporate Compliance Officer will:

1. Oversee and monitor the design, implementation, and improvement of the Corporate Compliance program in light of changes in the regulatory and legal environment.
2. Be responsible for developing, coordinating, and participating in a multifaceted Corporate Compliance education and training program that ensures all employees and affiliated parties are educated about the Code of Conduct, the Corporate Compliance program, and other specific issues as may be deemed necessary.
3. Ensure independent contractors and agents who furnish services are aware of the requirements of the Corporate Compliance program with respect to maintaining ethical standards and are aware of the False Claims Act and non-retaliation policies.
4. Coordinate personnel issues with the Office of People Operations to ensure that all of the required Exclusion Lists have been checked on a monthly basis with respect to all employees, medical staff, and independent contractors.

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5. Work with the CFO and other executive and managerial staff in periodic reviews, ongoing monitoring and evaluation of regulatory compliance in all business activities, and recommend the development of internal systems and controls to reinforce compliance in those areas.
6. Independently investigate and act on matters related to compliance, ensuring corrective actions are taken where compliance failures have been identified.
7. Develop and manage a hotline system and other feedback mechanisms that encourage administrators and employees to report suspected fraud and other improprieties without fear of retaliation.
8. Be responsible to implement all necessary actions to ensure achievement of the objectives of an effective compliance program by means of reviews, relevant training, a system of consistent enforcement of the rules, and the development/implementation of corrective action plans.
9. Maintain the Center for Discovery's Code of Conduct to ensure its continuing currency and relevance in providing guidance to administration and employees.
10. Develop, maintain, and revise compliance policies and procedures for the general operation of the program and related activities to prevent illegal, unethical, or improper conduct.
11. Oversee and manage performance of the compliance program and identify potential areas of compliance vulnerability and risk; and thereafter provide specific direction as to the resolution of problematic issues, as well as general guidance on how to deal with similar situations.
12. Analyze the organization's business, industry environment, and legal requirements with which it must comply, including specific risk areas; and assess existing policies and procedures covering these areas.
13. Prepare quarterly and annual reports and evidence for the Governance and Corporate Compliance Committee of the Board of Directors on the progress and effectiveness of compliance activities and efforts.
14. Develop and oversee a system for uniform responses to violations of rules, regulations, policies, procedures, and the Code of Conduct; and where appropriate, ensure proper reporting of potential violations of law to the duly authorized law-enforcement agencies.
15. Establish audit controls and measurements to ensure correct processes are in place.

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16. Maintain a working knowledge of relevant issues, laws, and regulations through periodicals, seminars, training programs, and peer contact.
17. Respond appropriately if a violation is uncovered, including a direct report to the CEO, Board of Directors or external agency if deemed necessary.

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