

THE CENTER FOR DISCOVERY

SUBJECT: Monitoring and Auditing of the Compliance Program	MANUAL: Corporate Compliance
	SECTION: Section 6

Purpose:

The Center for Discovery has developed and implemented a compliance program in an effort to establish effective internal controls that promote adherence to applicable federal and state law, regulations that govern all Center for Discovery operations and programs and applicable policies and procedures. An ongoing evaluation process is critical to a successful compliance program.

Policy:

1. The Corporate Compliance Department will annually complete a self-assessment of its program. This assessment will review the activities of the Compliance Program over the past year and identify areas in which the program has been successful as well as areas in need of improvement. Based on the findings of this audit, the Compliance Department will develop an improvement plan for the upcoming year.
2. The CCO is responsible for reporting to the Governance and Corporate Compliance Committee of the Board of Directors annually on all the elements of the compliance program to ensure the program is operating effectively to reduce the likelihood of wrongful acts and non-compliance with applicable regulations. These reports will note all Corporate Compliance program deficiencies and weaknesses, along with specific recommendations for corrective action.
3. The CCO will oversee the use of audits and/or other evaluation techniques to monitor compliance in the various Center for Discovery operations and programs. The results of these reviews will be presented quarterly to the to the Governance and Corporate Compliance Committee of the Board of Directors, along with specific recommendations for corrective action measures.

Procedures:

1. The Corporate Compliance Department will annually complete a self-assessment of its program. This assessment will review the activities of the Compliance Program over the past year and identify areas in which the program has been successful as well as areas in need of improvement. Based on the findings of this audit, the Compliance Department will develop an improvement plan for the upcoming year.
2. Findings of this self-assessment will be presented to the Corporate Compliance Committee by the CCO. The Committee will review the findings identified by the Corporate Compliance program to determine whether the OMIG compliance standards are being met. The findings and the plan for the upcoming year will be included in the annual report to the Board of Directors, along with any additional recommendations for corrective action measures for program improvement the Committee itself may have.

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3. The Governance and Corporate Compliance Committee of the Board of Directors will review the findings and the plan for approval. Any additional recommendations will be directed to the CCO.
4. The self-assessment will evaluate all aspects of the Compliance Program to include the following:
 - Compliance plan is complete and has been effectively implemented throughout the agency.
 - Systems are in place to address compliance related issues.
 - The Corporate Compliance Officer and Department members are known and visible throughout the agency.
 - The CCO and members of the Corporate Compliance department have participated in ongoing trainings during the year.
 - Corporate Compliance Committees on both the Management and Board levels of the organization have been established and effectively utilized as outlined in the policies.
 - Communication between the CCO and the Corporate Compliance Committee and to the QI/Corporate Compliance committee of the Board of directors has been open, productive, and effective.
 - Methods of reporting Compliance related concerns are effective.
 - Reports have been timely and thoroughly investigated.
 - Recommendations based on investigations have been implemented.
 - Compliance policies have been updated or revised as needed.
 - Appropriate cross sections of Departments have been audited.
 - Audits have been conducted based on identified risk areas.
 - Findings from audits have been addressed with development of an appropriate action plan with follow up as needed by the CC department.
 - If an overpayment has been made, it has been disclosed/refunded.
 - Documentation of audits, reports, investigations is maintained confidentially in secure locations.
 - All employees and Board members have received adequate training of the Compliance plan/code of conduct.
 - All board members and appropriate agency employees have signed a Conflict of Interest disclosure agreement.
 - All contractors/vendors have been provided with access to the corporate compliance plan/code of conduct.
 - Disciplinary practices have been fair and effective.
 - Non retaliation is emphasized.

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5. For those areas identified as in need of improvement, an action plan will be developed to include a target date.
6. Additionally the plan for the upcoming year will include an upcoming audit schedule based on findings from previous audits as well as risk assessments completed by departments within the agency.

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