

THE CENTER FOR DISCOVERY

SUBJECT: Policy Development and Implementation

MANUAL: Corporate Compliance

SECTION: Section 1

Purpose:

To establish the process and methodology for developing policy documents that meet professional standards, including those established by the Office of the Medicaid Inspector General (OMIG) as well as other federal and state agencies. The OMIG notes that every compliance program should require the development and distribution of written compliance policies that identify specific areas of risk to the organization. Policies related to the organization and operation of the corporate compliance program should be developed and reviewed annually.

Policy:

1. All compliance-related policies will follow the format set forth in this policy document.
2. The Corporate Compliance Officer is responsible for ensuring that policies and procedures have been developed, implemented, and reviewed annually to meet the standards for an effective and efficient compliance program.
3. Under the oversight of the the Corporate Compliance Department and the Executive Management Team (CEO, Associate Executive Director, CCO, CFO, Development Office), all Center for Discovery Departments are responsible for:
 - a. Policies/procedure development for compliance with laws and regulations that govern their individual departments/programs
 - b. Ensuring all appropriate staff can readily access all applicable training materials
 - c. Identifying and reviewing areas of compliance risk annually, unless otherwise required.
 - d. Determining if existing policy/procedures address identified areas of risk
 - e. Revising existing policies as needed
 - f. Developing new policies as needed

Procedures:

1. Any new policies and those policies submitted for revisions related to the organization and operation of the compliance program shall be developed under the direction and supervision of the Corporate Compliance Officer (CCO) and the Executive Management Team
2. All draft policies submitted for approval must describe the compliance issues in question, how the policy and procedure will address them, and the plan for implementation to include any training required. The CCO will hear presentation of the policy and procedure for approval, implementation, and distribution.

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3. Policies deemed to be critical to meeting the compliance standards of the Center for Discovery shall be adopted by the President / CEO after review by the Executive Management Team, legal counsel and the CCO.
4. The CCO will coordinate development of all draft compliance program policies.
5. To eliminate an existing policy, the Corporate Compliance Officer will consult with the President / CEO or his designees to concur on the reason for the proposed action.
6. All rescinded policies will be maintained by the CCO in a file designated for retired policies and procedures and filed by department and date
7. The CCO in conjunction with the appropriate department heads and/or their designees is responsible for ensuring proper dissemination, education, and training of approved new and revised policies to all applicable staff.
8. All policy documents shall describe:
 - a. The purpose and objectives of the policy.
 - b. Definitions for non-standard terms used in the policy.
 - c. Procedures that clearly define the specific tasks required to address the purpose and objectives of the policy.
 - d. Where appropriate, references to cited legal or regulatory authority.
9. Periodically, or as situation dictates, each department will identify all compliance risks, and report the results of that review to the CCO. Periodically, the CCO will meet with department heads to review policies and procedures to recommend amendments as necessary.
10. Revisions in policies specific to the Corporate Compliance program, once approved, will be reported to the Governance and Corporate Compliance Committee of the Board of Directors by the CCO on a quarterly basis.

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