

THE CENTER FOR DISCOVERY

SUBJECT: Employee Compliance Responsibilities

MANUAL: Corporate Compliance

SECTION: Section 3

Purpose:

To promote active support and involvement in the operation of the compliance program among all employees. It requires the commitment of all employees for a compliance program to be effective.

Policy:

1. All employees are responsible for the promotion of, and adherence to, the compliance program. This includes adherence to all applicable laws, regulations, policies, procedures, as well as the Code of Conduct. All staff will complete initial Corporate Compliance Training during orientation, and refresher training annually thereafter.
2. All employees must exercise reasonable diligence in identifying compliance risk areas.
3. All employees must ensure that non-compliance with laws, regulations, policies, procedures, and the Code of Conduct is detected and corrected in a timely manner. When such violations are detected, all affected parties must support the resolution process.
4. Standard language pertaining to individual responsibilities related to Corporate Compliance should be included in the position description and performance evaluations for all employees.

Procedures:

1. All Employees will:
 - a. Maintain compliance with laws, regulations, the Center for Discovery's Code of Conduct, policies, and procedures that pertain to their area of responsibility.
 - b. Attend compliance-related briefings, meetings and training as scheduled.
 - c. Immediately report suspected compliance violations.
 - d. Fully cooperate and assist in the conduct of compliance audits and investigations, whether internally or externally driven.
2. Administrative personnel will:
 - a. Ensure that their subordinate staff complete initial Corporate Compliance Training during orientation, and refresher training annually thereafter.
 - b. Ensure that their subordinate staff are updated on any legal or regulatory changes which effect corporate compliance practices.

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- c. Ensure that their subordinate staff, at all levels, understand their roles and responsibilities as it relates to corporate compliance within their positions.
 - d. Ensure that violations related to corporate compliance –that is, violations of laws, regulations, or Agency policies and procedures—are detected, communicated, and corrected in a timely fashion. The Quality Improvement/Corporate Compliance Department should be notified in such cases.
 - e. Provide the necessary oversight to detect compliance issues and areas or risk.
 - f. Maintain an open-door policy, and encourage staff to communicate observed compliance violations in accordance with the non-retaliation policy.
 - g. Fully cooperate and assist in the conduct of compliance audits and investigations, whether internally or externally driven.
3. The Quality Improvement/Corporate Compliance Department will:
- a. Design trainings related to Corporate Compliance, and ensure that these trainings are consistent with legal and regulatory requirements.
 - b. Inform Administrative personnel of any legal or regulatory changes which impact corporate compliance practices.
 - c. Conduct regular audits of programs and procedures in order to ensure continued compliance with applicable laws, regulations, and Agency policies and procedures.
 - d. Communicate deficiencies highlighted during audits to Administrative personnel, and provide recommendations pertaining to them.
 - e. Ensure that highlighted deficiencies are addressed and corrected by Administrative personnel.
 - f. In serious cases, assist in investigations related to compliance violations, under the direction of the Corporate Compliance Officer.

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