

# THE CENTER FOR DISCOVERY

SUBJECT: Compliance Issue Resolution

MANUAL: Corporate Compliance

SECTION: Section 4

## Purpose:

The Corporate Compliance Office has been created to act as a facilitator of issues and problems arising from expressed concerns, complaints, and allegations received from all affected individuals. In addition, the work of the compliance office may generate information that warrants closer examination or steps to resolve problems. The following policy and procedures are designed to provide guidance as to how this process will work.

## Policy:

1. All Affected individuals to include members of the CFD community, including its employees, contractors, agents, vendors, members of the Board of Directors and employees and others working on behalf of other governmental and private agencies and businesses doing business with CFD and its affiliates may use any communication channel they deem appropriate to report issues. Retaliation or retribution for reporting issues in good faith is prohibited. (Refer to the non-intimidation and non retaliation policy)
2. The Corporate Compliance Officer is responsible for resolving compliance-related issues. However, individuals should not be discouraged from using any specific communication channel. -The Corporate Compliance Officer will redirect issues unrelated to compliance to the appropriate department or individual.
3. Issues related to the operation of the Corporate Compliance program will be immediately referred directly to the Corporate Compliance Officer.
4. Should disclosure be required and the report is turned over to law enforcement, confidentiality of an individual will be protected to the extent allowed by law.

## Procedures:

1. Hotline calls will be handled in accordance with established policies and procedures. (Refer to the Compliance Hotline policy.)
2. The Corporate Compliance Officer will commence action, or refer matters to the appropriate administrator if unrelated to compliance, within the number of days required by law.
3. Issues with the potential for legal liability or containing issues of a legal nature will be immediately referred to legal counsel.
4. The Corporate Compliance Officer will involve various members of administration and as well as various employees where and when appropriate to resolve issues.

ORIGINAL DATE: 2/2012

SUPERSEDES: N/A

REVISION: 3

DATE: 7/23/19

FILE NUM: CC-4.4

PAGE: 1 OF 2

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5. For compliance-related issues, the Corporate Compliance Officer will conduct an initial investigation that may include document review, interviews, audit or other investigative techniques. The Corporate Compliance Officer will:
  - a. Conduct a fair, impartial review of all relevant facts
  - b. Restrict the inquiry to those necessary to resolve the issues
  - c. Conduct the inquiry with as little visibility as possible while gathering pertinent facts relating to the issue
  
6. The Corporate Compliance Officer will ensure the following objectives are accomplished:
  - a. Notify the appropriate internal parties
  - b. Identify the cause of an issue and anticipated outcomes, the affected parties, the applicable guidelines, and any possible regulatory or financial impact
  - c. Provide a complete list of findings and recommendations
  - d. Determine the necessary corrective action measures (e.g., policy changes, operational changes, system changes, personnel changes, or training and education payback of monies if warranted, )
  - e. Document the investigation in an appropriate time.
  
7. All investigative records will be maintained in accordance with the Corporate Compliance Office Records Management policy.

ORIGINAL DATE: 2/2012	SUPERSEDES: N/A	
REVISION: 3	DATE: 7/23/19	FILE NUM: CC-4.4
		PAGE: 2 OF 2