

# THE CENTER FOR DISCOVERY

SUBJECT: Reporting Findings from Compliance Program Audits	MANUAL: Corporate Compliance
	SECTION: Section 4

## Purpose:

The compliance program operates in an environment of transparency. In addition to auditing of the various departments within the agency to ensure compliance, the Compliance Department will evaluate its own policies, procedures, and investigation processes to determine overall effectiveness, to identify need for policy revisions and to identify areas in need of improvement. Findings from these audits will be reported to the Governance and Corporate Compliance Committee of the Board of Directors. An ongoing objective evaluation process is critical to a successful compliance program.

## Policy:

1. The Governance and Corporate Compliance Committee has responsibility for providing guidance and support of the Corporate Compliance Officer and the Corporate Compliance program.
2. The CCO is responsible for reporting to the Committee annually on all the elements of the compliance program to ensure they are 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 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 full 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 Board of Directors will review the findings and the plan for approval. Any additional recommendations will be directed to the CCO.

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