

THE CENTER FOR DISCOVERY

SUBJECT: Corporate Compliance Committee Charter	MANUAL: Corporate Compliance
	SECTION: Section 4

Chair: Corporate Compliance Officer
Approval: _____ **Effective Date:**

Sponsor: CEO **Approval:** _____ **Date:**

Purpose: To assist and coordinate with the Corporate Compliance Officer (“CCO”) to ensure that The Center For Discovery, Inc., (“TCFD”) is conducting its business in a legal, ethical, and responsible manner, consistent with its Corporate Compliance Program.

The Corporate Compliance Committee (“CCC”) shall have the authority to undertake the specific duties and responsibilities described below and the authority to undertake such other duties as directed by the

Meetings and Procedures

The CCC shall meet on a regular basis, not less frequently than quarterly.

The CCC shall meet with the Organization’s Management and staff at the discretion of the Corporate Compliance Officer.

The CCC shall maintain written minutes or other records of its meetings and activities. Minutes of each meeting of the CCC shall be distributed to each member of the Committee and filed electronically. Minutes and other records of Committee activity will be maintained by the CCO.

The Chair of the CCC shall report to the Chief Executive and Board following meetings of the CCC, and as otherwise requested by the President of the Board.

Membership:

The Chairperson of the CCC is the CCO.

Committee members include:

The Chief Executive Officer
VP of Finance
Chief of Quality Improvement
VP Operations
Head of Safety and Security
Chief of Human Resources
Head of Earth Care
Chief of Residential and Day Hab Programming
Chief of School Program, Clinicians and Psychiatry
Chief of Clinic/Specialty Hospital

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Chief of Nursing
Chief of Admissions
Medical Director
Compliance Director

Responsibilities:

1. The CCC works with the CCO to ensure that TCFD has, and maintains, an effective Compliance Program. The CCC is responsible for the following:
 - a. Analyzing the regulatory environment where TCFD does business, including legal requirements with which it must comply;
 - b. Reviewing and assessing existing policies and procedures that address risk areas for possible incorporation into the Corporate Compliance Program;
 - c. Reviewing and monitoring Corporate Compliance Program training and education to ensure that they are effective and completed in a timely manner;
 - d. Ensuring that TCFD has effective systems and processes in place to identify Compliance Program risks, overpayments, and other issues and has effective policies and procedures for correcting and reporting such issues;
 - e. Working with departments to develop standards and policies and procedures that address specific risk areas and to encourage compliance according to legal and ethical requirements;
 - f. Coordinating with the CCO to ensure that the written policies and procedures, and Standards of Conduct are current, accurate, and complete;
 - g. Developing internal systems and controls to carry out compliance standards, Standards of Conduct, and policies and procedures;
 - h. Coordinating with the CCO to ensure communication and cooperation by Affected Individuals on compliance-related issues, internal or external audits, or any other function or activity;

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- i. Developing a process to solicit, evaluate, and respond to complaints and problems;
 - j. Monitoring internal and external audits to identify issues related to non-compliance;
 - k. Implementing corrective and preventative action plans and follow-up to determine effectiveness;
 - l. Ensuring the development and implementation of an annual Corporate Compliance Work Plan;
 - m. Advocating for sufficient funding, staff, and resources to be allocated to the CCO to carry out duties related to the Compliance Program;
 - n. Ensuring that TCFD has appropriate systems and policies in place that effectively identify risks, overpayments, and other areas of concerns including fraud, waste, and abuse;
 - o. Monitoring and evaluating TCFD’s Compliance Program for effectiveness and making recommendations for necessary modifications to the Compliance Program as applicable
2. The CCC shall conduct an annual evaluation of the effectiveness of the Compliance Program.
 3. The CCC shall review and reassess its Charter at least annually and submit any recommended changes to the Chief Executive for consideration.
 4. The CCC shall perform such other functions and have such other powers as may be necessary or convenient for efficient discharge of its duties.

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