

THE CENTER FOR DISCOVERY

SUBJECT: Policy Development, approval and Maintenance Policy	MANUAL: Corporate Compliance
	SECTION: Section 7

Purpose: The Policy and Procedure provides clear direction for the process of developing and maintaining policies and establishes a process that promotes effective and timely policy development and review.

Policy:

It is the policy of The Center for Discovery (“TCFD”) to establish a standardized process for policy development, approval, revision, and implementation.

Regulatory Reference:

Social Service Law 363-D

18 NYCRR Part 521

Procedures:

1. Policies shall be developed and/or revised to meet legal and regulatory requirements and to comply with other TCFD policies.
2. All TCFD’s policies will contain the required information:
 - a. Title – Name of the policy.
 - b. Policy Number – Number of the corresponding policy prefaced with the Department abbreviation.
 - c. Classification – Defines specific area addressed and access control to the policy.
 - d. Type – Defines the workflow/department responsibilities for creation and monitoring.
 - e. Policy Owner – Administers, oversees, and amends policy.
 - f. Approved – Date on which the policy was approved by the Board of Directors and Chief Executive Officer.
3. All TCFD’S Policies will contain required sections to include:
 - a. Policy – Brief description of the policy.
 - b. Purpose – A brief description of why the Policy is being promulgated and/or what it seeks to accomplish.

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- c. Procedure – Detailed procedure to be followed to implement the policy appropriately.
 - d. Attachments – Additional forms associated with the policy.
 - e. References and Regulations – Regulatory reference numbers (external), other guidance documents and/or training modules.
4. The Policy Owner is the department/program administrator or individual responsible for the policy implementation and oversight. The Policy Owner shall be responsible for recommending the timely development, review, revision, and implementation of new and existing policies relating to their respective areas of accountability.
 5. All newly created or substantially revised policies will be approved by the appropriate Policy Owner and/or appropriate administrator and submitted to the Corporate Compliance Officer (“CCO”) for presentation to the Policy Review Committee. Upon approval by the Policy Review Committee the policy will then be sent for review to the Corporate Compliance Committee (“CCC”). The CCO in collaboration with the CCC, will review new or revised policies and offer feedback to the Policy Owner and/or appropriate administrator.
 6. The CCO or designee will oversee the Policy Owner who will be responsible for the overall coordination and implementation of any new or revised policy. The Chief Executive Officer and other Senior Management will be consulted as needed throughout the process of developing or revising any policy and must review all policies prior to approval to ensure compliance with legal and regulatory requirements and other TCFD policies.
 7. After review and approval from the Policy Committee and the CCC, all newly created policies will be reviewed and approved by the Chief Executive and Board of Directors. The Chief Executive Officer and Board of Directors shall approve all policies prior to implementation. The date of approval of each policy shall be included in the policy. The effective date of the policy shall be the date of distribution.
 8. Approved Policies will be cataloged and distributed to a standard distribution list, which shall include the Board of Directors, the Chief Executive Officer, and all employees, and, if applicable, independent contractors and agents within 10 business days of final approval.
 9. The People Operations Department and/or Training Department or designee, shall develop a plan for informing and educating employees, and independent contractors, if applicable, of the TCFD’s new and revised policies.

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10. TCFD will maintain an official TCFD policy structure with the most current approved versions, with references to applicable procedures or related documents. An ongoing file of revised policies, substitute policies and current policies. Policies, as they are revised or replaced, shall not be discarded.

11. All policies will be reviewed annually by the Policy Owner or designated party to determine if there are any revisions that are appropriate or required. If there are necessary the policy will be submitted for approval in accordance with the procedure outlined above

Sanction Statement:

Non-compliance with this policy may result in disciplinary action, up to and including termination.

Compliance Statement:

As part of its ongoing auditing and monitoring process in its Corporate Compliance Program, TCFD will review this policy based on changes in the law or regulations, as TCFD's practices change, and, at minimum, on an annual basis. Additionally, this policy will be tested for effectiveness on an annual basis or more frequently as identified in accordance with TCFD's Corporate Compliance Program. Testing will include but is not limited to ensuring that the policy is appropriately followed; the policy is effective; the policy has been disseminated to all Affected Individuals, as well as notified of any updates or changes.

Tracking of the criteria above and results of this testing will be completed by the CCO, or designee. Additionally, results will be reported to the CCC and Governing Body on a regular basis.

Record Retention Statement:

TCFD will retain this policy and all subsequent revisions, and any related documentation will be retained for a period of, at minimum, six years.

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