

SELFHELP COMMUNITY SERVICES, INC.		Policy #: 11
CORPORATE COMPLIANCE POLICY AND PROCEDURE MANUAL		Page 1 of 2
<b>Subject:</b> Reporting Guidelines	<b>Effective Date</b> January 2006	<b>Revision Date</b> 03/2008, 1/2014 12/2015, 3/2018, 8/2023
<b>Section:</b> Corporate Compliance Reporting		

**POLICY:**

Selfhelp Community Services, Inc. personnel, including board members, employees, senior administrators, executive staff, managers, contractors, subcontractors, consultants, independent contractors and other agents of Selfhelp are responsible for adhering to the Corporate Compliance Plan including the reporting of suspected violations.

Each employee has an individual responsibility to keep their knowledge current regarding the legal, regulatory and policy compliance requirements related to their job responsibilities.

Selfhelp Community Services, Inc. is committed to providing anyone required to report or eligible to report with the ability to make an anonymous report in writing, through the Compliance Hotline and/or the Board Compliance Hotline.

Selfhelp Community Services, Inc. shall publicize the Compliance Hotline and make it available to all Medical Assistance (Medicaid) recipients of service and all personnel, as described herein, who are affected by Selfhelp’s risk areas.

**PROCEDURE:**

1. All reports of suspected non-compliance or misconduct are either made directly to, or are submitted to, the Corporate Compliance Officer. The number is 212-971-7610.
2. All reports are kept confidential as are the conduct and findings of any investigation and outcome to the extent permissible under the law.
3. The Anonymous Compliance **Hotline** number is **646-616-7480**.
4. In accordance with the *Corporate Compliance Plan and the Code of Conduct and Ethical Behavior*:
  - A) Employees are encouraged to ask questions and report problems or concerns to their program manager or the Compliance Officer.

- B) Managers play a key role in responding to employee concerns and serve as the first line of communication;
- C) All personnel are required to immediately report a suspected violation of, or questionable request by, an employee (including supervisory or managerial staff) once they are made aware of the behavior. The report of such questionable acts may be to the Compliance Officer, the Anonymous Compliance Hotline or the Anonymous Board Hotline.
- D) If not reporting anonymously, personnel are required to participate in an investigation of a report if requested by the Compliance Officer.
- E) Managers and Directors are required to communicate all reports to the Corporate Compliance Officer as soon as possible.
- F) The Compliance Officer serves as a resource to personnel for clarification of the organizations policies, contracts and applicable laws and regulations.
- G) The Compliance Officer shall document all matters reported as suspected violations, conduct an investigation to evaluate the accuracy of the report, and communicate to the Corporate Compliance Committee. The Corporate Compliance Officer shall maintain a log of all reports, including the nature of the investigation and its results.
- H) All reports of suspected violations made to either a Manager or Supervisor and/or to the Corporate Compliance Officer shall be made in good faith and with the best of intentions. Selfhelp considers it a serious violation of policy for any personnel to intentionally make false accusations. Such false accusations may result in disciplinary action, up to and including termination, against the accuser.