

SELFHELP COMMUNITY SERVICES, INC.		Policy #: 23
CORPORATE COMPLIANCE POLICY AND PROCEDURE MANUAL		Page 1 of 2
<b>Subject:</b> Policy and Procedure Development	<b>Effective Date</b> June 2006	<b>Revision Date</b> March 2008, January 2014, August 2023
<b>Section:</b> Corporate Compliance - Other		

**POLICY:**

All new Compliance policies and procedures developed by the program director/division head are to be submitted to the Compliance Officer for approval by the Corporate Compliance Committee.

**PROCEDURE:**

1. Each program is responsible for ensuring that their program policies and procedures are developed in accordance with Federal, State and local statutes and regulations, and contractual requirements.
2. Each program develops or revises current policies in response to changes within the industry, regulation and/or to improve programmatic outcomes to achieve more effective and efficient customer outcomes.
3. As laws and regulations are ratified and become effective written documentation of new legal requirements and contractual changes will be disseminated to the programs by the Legal Department and policies amended accordingly.
4. Each program ensures compliance with applicable aspects of the law, regulation, and contractual requirements by developing practice standards and procedures for their staff follow to ensure compliance, and educating the staff accordingly.
5. Upon the development of a new or revised policy by a program, with the approval of the program director, final drafts are submitted to the Vice President or department head for review to determine compliance with applicable laws, regulations and contractual agreements.
6. The Compliance Officer will utilize all appropriate resources, including but not limited to the Corporate Compliance Committee, legal counsel and other entities as necessary, to ensure that a policy is in accordance with applicable standards.

7. The Compliance Officer shall review and respond to final drafts of policies.
8. When the final draft policy is noted to have compliance issues with applicable laws, regulation and/or contractual requirements, the Compliance Officer will notify the program's director within a reasonable time period.
9. When there are timing deadlines and it is noted that a policy needs to be implemented, but is not yet approved, an Interim Policy may be implemented while the policy is finalized.
10. Interim policies should not be in effect for more than four (4) weeks and staff must be aware that the policy is provisional.
11. If the policy complies with all applicable laws, regulations, and/or contractual requirements, it will be approved for implementation.
12. Those administrative policies that effect the organization are submitted to the Legal Department and are presented, as needed, to Council members by the author for review, discussion, and recommendation.
13. Final review by the Legal Department is a formality to ensure consistency in the approval process.
14. All policies and procedures are maintained by the Legal Department.
15. The department is responsible for ensuring that staff has access to the administrative and programmatic policy manuals and that all manuals are up-to-date.
16. All policies and procedures shall be reviewed by each program in collaboration with the Compliance Officer on an annual basis.
17. Each policy manual indicates the date that an annual review or any additional reviews were conducted, the new and revised policies listed, and the effective date of the reviewed and approved policies.