

SELFHELP COMMUNITY SERVICES, INC.		Policy #: 4
CORPORATE COMPLIANCE POLICY AND PROCEDURE MANUAL		Page 1 of 7
Subject: Compliance Oversight	Effective Date January 2006	Revision Date 3/2008, 3/2018, 8/2023
Section: Corporate Compliance		

POLICY:

Oversight of the Corporate Compliance Program of Selfhelp Community Services Inc. is managed through the Corporate Compliance Officer and the Corporate Compliance Committee.

All 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.

Directors and Managers are responsible for ensuring adherence to the corporate compliance plan through the development of program policies and procedures that guide personnel (including contractors, subcontractor's and consultants) in day-to-day operations and apply appropriate measures to ensure that personnel abide by those policies.

The Board of Directors through the Audit Committee has overall responsibility for the Corporate Compliance Program.

PROCEDURE:

1. The Corporate Compliance Officer is responsible for overseeing the administration and implementation of Selfhelp Community Services, Inc.'s Corporate Compliance Program, reports directly to the Office of the General Counsel and has direct access to the Chief Executive Officer and to the Board of Directors.
2. The Corporate Compliance Officer has the authority to review all documents and information relevant to compliance activities, including but not limited to medical records, billing records, documents concerning the marketing efforts, and

arrangements with other health care providers, including physicians and independent contractors.

A) Responsibilities of the position include, but are not limited to:

1. Developing, monitoring, and implementing the compliance program, including the development of a Code of Conduct and compliance policies and procedures for review and approval by Selfhelp Community Services, Inc. Board of Directors;
2. Revising the compliance program as necessary to reflect changes in state or federal law, private payer requirements, or changes in operations and disseminating this information to all personnel, contractors, subcontractors and consultants;
3. Drafting, implementing, and updating a compliance work plan no less frequently than annually or, as otherwise necessary, to conform to changes to Federal and State laws, rule, regulations, policies and standards.
4. Coordinating the training and education of personnel, including board members, employees, senior administrators, executive staff, managers, contractors, subcontractors, consultants, independent contractors and other agents of Selfhelp who are affected by Selfhelp risk areas about the compliance program; confirming that they understand their responsibilities with respect to compliance with pertinent federal and state laws and standards, including their responsibilities relating to the reporting of suspected violations or questionable conduct;
5. Confirming that all employees, contractors, subcontractors, consultants, independent contractors and other agents of Selfhelp who furnish social services, nursing or other services to clients/patients of Selfhelp Community Services, Inc. and any other related corporation are aware of the client rights as well as requirements of the compliance program applicable to the services they provide;
6. Coordinating with the Human Resources Department, Licensed Home Health Care Agency, and Certified Home Health Agency to confirm that the Office of the Inspector General's (OIG) List of Excluded Individuals/Entities has been checked with respect to all personnel,

contractor, subcontractors, and consultants and no person or entity is excluded from participating in any federal or state health care program;

7. Developing, implementing, and maintaining a confidential reporting system for personnel and others to report suspected violations of law or prohibited conduct;
 8. Participating with the Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, the Board of Directors, and General Counsel as necessary in the analysis of reporting requirements with respect to alleged violations of program requirements;
 9. Working with the facility's Chief Financial Officer to confirm the regular financial audits by outside auditors are completed;
 10. Establishing a record-keeping system to document compliance activities; and
 11. Providing clarification on the organization's compliance policies and program.
3. The role of the Compliance Committee is to advise the Compliance Officer and assist in the implementation of the compliance program. Functions of the committee include, but are not limited to:
- A) Analyzing the federal, state and local requirements with which Selfhelp Community Services Inc must comply;
 - B) Identifying and analyzing specific risk areas;
 - C) Assessing existing policies and procedures for incorporation into the compliance program;
 - D) Working with Selfhelp programs to identify, develop and revise, as necessary, policies and procedures that promote compliance with legal and ethical requirements;
 - E) Recommending and monitoring the development of internal systems and controls to carry out the organization's policies;

- F) Determining the strategies and approaches to promote compliance with program requirements and detection of potential violations;
 - G) Developing a system to solicit, evaluate, and respond to complaints and problems;
 - H) Monitoring internal and external audits and investigations for the purpose of identifying deficiencies and implementing corrective action;
 - I) Assisting in the development of training and education of the compliance program; and
 - J) Advocating for the allocation of sufficient funding, resources and staff for the Compliance Officer to fully perform their responsibilities.
4. The Compliance Officer chairs the Compliance Committee, and members include, but are not limited to the Chief Operating Officer, Chief Financial Officer, Compliance Officer, General Counsel and other Program Directors, including senior staff from the Human Resources department. Other organizational leadership and management staff is requested to participate in committee activities as needed.
5. The promotion of, and adherence to, the elements of the compliance program is a factor in evaluating the performance of all employees.
6. Directors and Managers serve as the first line of communication regarding compliance issues for employees. These positions are required and directed to report concerns, questions, and employee reports of suspected and/or prohibited activity immediately to their supervisor or directly to the Compliance Officer.
7. Directors and Managers are expected to:
- A) Discuss with all supervised employees and relevant contractors and consultants the compliance policies and requirement applicable to their function;
 - B) Inform all personnel that compliance with the organizations policies and procedures is a condition of employment;

- C) Disclose to all personnel that disciplinary action up to and including termination, may follow for violation of the organization's policies, procedures, and code of conduct;
 - D) Inform all personnel that neither Selfhelp Community Services, Inc. nor any of its employees, will retaliate against any individual for reporting in good faith a suspected violation or questionable conduct, or for cooperating in an investigation;
 - E) Require that all personnel participate in all training and in-services related to the organization's corporate compliance program at hire and thereafter;
 - F) Maintain policies and procedures that enable the Directors and Managers to confirm that functions under their supervision are implemented in compliance with law and that employees under their supervision perform their duties in compliance with these policies and procedures and applicable law.
8. Directors and Managers will be disciplined for failing to instruct their subordinates that failure to detect noncompliance with applicable policies and legal requirements, where reasonable diligence would have led to the discovery of any problems or violations and have given the organization the opportunity to resolve them earlier, will subject the subordinate to disciplinary action, up to and including termination.
9. The Audit Committee has been established to assist the Board of Directors in:
- A) Overseeing the process for preparing the Selfhelp Community Services, Inc. financial statements;
 - B) Overseeing the independent auditor's qualifications and independence;
 - C) Overseeing the performance of the organization's independent auditor; and
 - D) Overseeing the organizations system of disclosure controls and systems of internal controls regarding finance, accounting, compliance, and ethics.
10. The Board of Directors is ultimately responsible for supervising the work of the Compliance Officer, adopting and maintaining the standards of conduct in the compliance program. Written notes, records, correspondence, or minutes (as appropriate) of the Board of Directors meetings shall be maintained to reflect the

compliance activity reports were made to the Board, and decisions on issues raised, subject to attorney/client privilege.

11. The Board of Directors will:

- A) Oversee all of the compliance efforts;
- B) Consult with advisors as necessary;
- C) Coordinate with the Compliance Officer to confirm that the compliance program is being implemented as expected and addresses identified concerns;
- D) Receive notice of all state, federal, and/or inspection reports indicating the organization's level of compliance with applicable laws or standards and a summary of the measures instituted and maintained to address issues raised by such notices;
- E) Confirm that measures are instituted and maintained in response to identified compliance issues;
- F) Require that the organization's activities meet applicable standards of business, legal and ethical compliance;
- G) Take action as necessary to confirm that the organization conducts activities in compliance with applicable law and regulations and sound business ethics;
- H) Confirm that follow-up action is taken, including employee disciplinary action, in response to verified violations of applicable law or the organization's compliance program; and
- I) Receive written reports or summations from the Compliance Officer regarding the progress of adopting, implementing, and maintaining the compliance program including, but not limited to:
 - 1. the number of reports received on the organization's hotline;
 - 2. the number of investigations undertaken and the results of the investigations;

3. the number of disciplinary actions taken against employees for failing to detect or deter violations of ethics, law, or compliance policies;
4. the number of agents whose contracts were terminated for failing to comply with the organization's Code of Conduct;
5. the number of the new policies written in response to changes in reimbursement or billing procedures implemented by Medicaid or other governmental or private payment programs;
6. the number of claims that require either re-submission or information in order to be processed; and
7. other information as requested by the Board of Directors

12. The Compliance Officer, Chief Executive Officer, Chief Operating Officer, Chief Financial Officer, General Counsel and the Board of Directors will consult as necessary on issues raised by reports of suspected violations or questionable conduct, and review revisions to the amendments or revisions to the compliance program, as necessary.