

SELFHHELP COMMUNITY SERVICES, INC.		Policy #: 5
CORPORATE COMPLIANCE POLICY AND PROCEDURE MANUAL		Page 1 of 2
Subject: Audit Committee and Board of Directors	Effective Date January 2006	Revision Date 03/2008, 8/2023
Section: Corporate Compliance Program Oversight		

POLICY:

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

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

PROCEDURE:

1. The Board of Directors established the Audit Committee to assist 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 organization’s system of disclosure controls and system of internal controls regarding finance, accounting, compliance, and ethics.
2. 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.
3. Written notes, records, correspondence, or minutes (as appropriate) of the Board of Director’s meetings shall be maintained to reflect the compliance activity reports made to the Board, and decisions on issues raised, subject to attorney/client privilege.
4. The Board of Directors through the Audit Committee 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 quality/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 laws 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:
- the number of reports received on the organization's hotline;
 - the number of investigations undertaken and the results of the investigations;
 - the number of disciplinary actions taken against employees for failing to detect or deter violations of ethics, law, or compliance policies;
 - the number of agents whose contracts were terminated for failing to comply with the organization's Code of Conduct;
 - 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;
 - the number of claims that require either re-submission or information in order to be processed; and
 - other information as requested by the Board of Directors.