

SELFHELP COMMUNITY SERVICES, INC.		Policy #:6
CORPORATE COMPLIANCE POLICY AND PROCEDURE MANUAL		Page 1 of 3
Subject: Corporate Compliance Officer	Effective Date January 2006	Revision Date 03/2008, 1/2014 03/2018, 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.

All personnel, including board members, employees, senior administrators, executive staff, managers, contractors, subcontractors, consultants, independent contractors and other agents of Selfhelp who are affected by the required provider's risk areas 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 responsibilities for the Corporate Compliance Program

PROCEDURE:

1. The Compliance Officer is responsible for overseeing the administration and implementation of Selfhelp Community Services, Inc.'s 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 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.
3. The Compliance Officer has the authority to review all documents and information that are 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. Responsibilities of the position include, but are not limited to:

- A) 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;
- B) 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;
- C) 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;
- D) 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;
- E) Inform personnel about the compliance program and confirm that they understand their responsibilities with respect to compliance with pertinent federal and state laws, regulations and standards, including their responsibilities relating to the reporting of suspected violations or questionable conduct;
- F) 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 clients rights as well as requirements of the compliance program applicable to the services they provide;
- G) Coordinating with the Human Resources Department, the Certified Home Health Agency and the Licensed Home Health Care 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 that no person or entity doing business with Selfhelp Community Services, Inc. has been sanctioned or is

- currently sanctioned or excluded from participating in any federal or state health care program;
- H) Developing, implementing, and maintaining a confidential reporting system for personnel and others to report suspected violations of law or prohibited conduct, to include the Compliance hotline;
 - I) Participating with the Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, General Counsel and the Board of Directors, as necessary in the analysis of reporting requirements with respect to alleged violations of program requirements;
 - J) Working with the facility's Chief Financial Officer to confirm that regular financial audits by outside auditors are completed timely;
 - K) Establishing a record-keeping system to document compliance activities; and
 - L) Providing clarification on the organization's compliance policies and program.