



<b>Policy Name:</b>	<b>Corporate Compliance Program</b>
<b>Policy Code:</b>	<b>001</b>
<b>Policy Purpose:</b>	To establish and publish the official policy of Rise regarding the organization's corporate compliance program and plan.

## I. Overview

- A. Rise is dedicated to the operation of rehabilitation/habilitation environments characterized by strict conformance with the highest standards of accountability for administration, clinical, business, marketing, and financial management. Rise's leadership is fully committed to the need to prevent and detect fraud, fiscal mismanagement, and misappropriation of funds, and therefore, to the development of a formal corporate compliance program to ensure ongoing monitoring and conformance with all legal and regulatory requirements. Further, the organization is committed to the establishment, implementation, and maintenance of a corporate compliance program that emphasizes:
1. Prevention of wrong doing – whether intentional or unintentional.
  2. Immediate reporting and investigation of questionable activities and practices without consequences to the reporting party.
  3. Timely correction of any situation, which puts the organization, its leadership or staff, funding sources or consumers at risk.

## II. Procedure

- A. By formal resolution, the Board of Directors has delegated overall responsibility for the Corporate Compliance Program to the Director of Human Resources. The Director of Human Resources is designated as the Corporate Compliance Officer. The Corporate Compliance Officer will monitor the organization's corporate compliance program, and provide periodic and regular reports to the Board of Directors on matters pertaining to the program. The Corporate Compliance Officer (CCO) shall:
1. Chair the organization's Corporate Compliance Team and serve as the organization's primary point of contact for all Corporate Compliance issues, including scheduling team meetings, reporting on team activities, and making recommendations to the Board of Directors as required; The Corporate Compliance Team will be made up of the President, Vice President, CFO, and any other persons designated by the Corporate Compliance

Officer. The Team will review all complaints within seven (7) business days of being made aware of them. The team will decide if further investigation or review is needed and will designate the lead investigator.

2. Develop, implement, and monitor – on a regular and consistent basis – the organization’s corporate compliance plan, including all internal and external monitoring, auditing, (in conjunction with the Audit Committee of the Board of Directors) investigative and reporting processes, procedures, and systems.
  3. Prepare, submit and present periodic reports to the Board of Directors as may be required to provide clear communication to the organization’s leadership for corporate compliance oversight.
  4. Coordinate development of the organization’s formal corporate compliance plan.
- B. The Corporate Compliance Officer shall submit an annual report to the Board of Directors. Annual reports will, include at a minimum:
1. A summary of all allegations, investigations, and/or complaints processed in the preceding 12 months in conjunction with the corporate compliance program.
  2. A complete description of all corrective action(s) taken.
  3. Any recommendations for changes to the organization’s policies and/or procedures.
- C. In the performance of their duties, the Corporate Compliance Officer shall have direct and unimpeded access to the Board of Directors, and the organization’s audit/accounting firm and/or legal counsel for matters pertaining to corporate compliance.
- D. As part of corporate compliance plan development, the Corporate Compliance Officer shall schedule, coordinate, and monitor periodic reviews of risk areas within the Corporate Compliance Team and will include competent persons outside the organization as needed. Such reviews will be conducted as a way to ensure ongoing conformance with billing, accounting, and collection regulations imposed by the federal government and other “third party” funding sources. More critically, these reviews will augment the organization’s annual audit of its accounting system and provide an additional, internal measure to ensure conformance with billing and coding policies and practice that will withstand the scrutiny of any regulatory audit or examination.