



Corporate Compliance Plan

Introduction

Family Pride of Northeast Ohio, Inc. is committed to creating and maintaining a work environment of compliance with federal, state and regional guidelines that facilitates a high quality of professional mental health service delivery. All employees, students, and volunteers will be trained on the organization's Corporate Compliance Plan. Corporate Compliance annual training updates will be provided to ensure adherence to organization requirements.

Plan

Family Pride has long recognized that our behavioral health services involve significant legal and ethical responsibilities. These responsibilities extend not only to our clients, but also many stakeholders, companies and agencies that we work with, our colleagues and the public at large. We must demonstrate consistently the way we act with absolute integrity in the way we do our work and the way we live our lives.

This plan was adopted as a guide for employees' conduct so that they may fulfill their obligations to observe the laws and public policies affecting daily business and to deal fairly with clients and communities where they operate. Employees include interns, volunteers, and regular full-time and part-time employees. The plan provides guidance to ensure that our work is done in an ethical and legal manner.

For compliance to be effective, it must have cooperation of all employees. The plan contains resources to help resolve questions about appropriate conduct at work. The plan aids in the identification and correction of an actual or perceived violations of any applicable rules. The plan imposes a duty upon all employees to report to the Executive Director any violation of conduct.

The expectation of Family Pride of Northeast Ohio, Inc. is that each and every stakeholder should feel free without fear of reprisal to communicate concerns to the Executive Director. Any such report will be maintained in strictest confidentiality to the maximum extent consistent with fair and rigorous enforcement of the plan.

Failure to observe the organization's Policies and Procedures can result in serious consequences to the employee, such as termination and criminal charges. The primary importance of the plan is to ensure that Family Pride of Northeast Ohio, Inc. maintains its clinical integrity within the service community.

Directives

The effectiveness of the Corporate Compliance Plan depends upon the leadership efforts at Family Pride of Northeast Ohio, Inc. Colleagues are obligated to follow the plan, but leaders are expected to set examples, to be in every respect a model and mentor to employees. Leaders must ensure that staff has sufficient information and training to comply with laws, regulations, policies and procedures of the operational manual. Staff must also have access to resolve ethical dilemmas.

Leaders' Goals are as follows:

- To maintain compliance standards and procedures reasonably designed to reduce the risk of criminal conduct and other violations of the codes of ethics.
- To allow only specific, high level personnel to be assigned the ultimate responsibility for overseeing the compliance program. The Executive Director has the ultimate responsibility for the Corporate Compliance Plan. In the event that the executive Director is the focus of the compliance inquiry, the Chair of the Board of Directors shall act as the convening authority in the matter.
- To take reasonable steps to communicate effectively and achieve compliance with the standards and procedures for all employees, interns or volunteers.
- To utilize auditing systems that are reasonably designed to detect unethical or wrongful behaviors or criminal conduct by its employees.
- To monitor publicized reporting systems for employees, interns and volunteers so that illegal and unethical conduct by others may be reported to the appropriate authority without fear of reprisal.
- To cooperate with appropriate federal, state, and local authorities investigating a potential violation of law or unethical behavior. This includes requirement to preserve all evidence, and to hold intact material related to the alleged offense without altering or destroying it.

Duties of the Compliance Officer (Executive Director)

The Executive Director shall:

- Coordinate and monitor all compliance efforts on a daily basis
- Ensure that all delegations of responsibility under the plan are made to persons reasonably believed to be morally fit, honest and capable of making necessary judgments.
- Consult with legal counsel to obtain interpretations of any requirements under the plan which appears unclear.
- Bring to the attention of legal counsel all changes in circumstances, which could reasonably suggest that the plan should be modified.
- Promptly complete all tasks expressly assigned by the plan.

Training and Education

The Executive Director shall train all staff on the expectations of the plan and distribute the organization's policies on professional ethics. All staff will be required to read the plan and sign acknowledgement that violations may lead to disciplinary action or criminal charges.

Reporting Potential Violations

Family Pride of Northeast Ohio, Inc. expects employees to report potential violation of the compliance plan in writing, using the standard complaint form.

The Executive Director Shall:

- Review each report and notify the appropriate authorities of any allegation of criminal behaviors.
- Take action, in conjunction with the Chair of the Board of Directors, commensurate with the gravity of the allegation to determine if the allegation is valid, and what corrective action should be imposed.
- Oversee all investigations and corrective action plans that should be imposed and provide status reports to the Chair of the Board of Directors.

Employee Disciplinary Procedures

Violations of Ethics and Corporate Compliance policy shall be managed as follows:

ACTION	DISCIPLINARY ACTION
<ul style="list-style-type: none">• Negligently providing false or misleading information to Family Pride of Northeast Ohio, Inc., government agency, customer or insurer• Negligent violation of federal, state, or local laws• Failure to report another employee’s conduct which violates any law, standard or regulation.• Failure or refusal to cooperate with Family Pride of Northeast Ohio, Inc in a compliance investigation• Failure to exercise adequate supervision of subordinate personnel where such failure leads to a compliance incident.• Engage in any other conduct which fails to comply with the duties and prohibitions, expressed or implied, set forth in the Family Pride Corporate Compliance Plan.	Oral reprimand to termination
<ul style="list-style-type: none">• Intentionally providing false or misleading information to Family Pride, government agency, customer or insurer• Intentional violation of any federal, state or local law.• Direct retaliation against any employee who in good faith reports a compliance issue.	Termination

Business Associates

The Executive Director shall ensure that as Family Pride of Northeast Ohio, Inc. enters into Business agreements with firms or persons serving as subcontractors; the Business Associate is in compliance with federal, state and local requirements.

Record Retention

All Corporate Compliance records shall be maintained for at least (7) seven years.