

HOPE HAVEN CHILDREN'S CLINIC AND FAMILY CENTER

ORGANIZATIONAL COMPLIANCE PLAN

Hope Haven is committed to conducting its business in an ethical and law-abiding fashion. The purpose of this plan is to prevent fraud, abuse, waste, other wrongdoings or violations of any applicable federal, state or local law. We are also reiterating the expectation that all of us affiliated with Hope Haven will act in a manner consistent with our mission, vision, values and code of ethics.

Mission

Hope Haven's multi-disciplinary team provides excellence in education, psychological and related therapeutic services for children, families and young adults with special needs.

Vision

Individuals with special needs will be healthier and more independent, educated and involved in community life.

Values

We believe in:

- **Families** - Nurturing and supportive families are essential in defining and developing an individual's character, self-esteem, motivation and potential for fulfillment. All families should have equal access to supportive services that can aid them in preparing children to meet the demands of the future.
- **Excellence** - Individuals with special needs and their families benefit from quality professional care, utilizing a multi-disciplinary approach to diagnosis and treatment, and recognizing and respecting each individual's unique qualities. Families deserve access to these services regardless of age, socio-economic status, race, religion, ethnicity, gender, sexual orientation or disability.
- **Potential** - Children and adults with disabilities should have the opportunity to develop to their fullest potential and deserve to have access to services which

ensure them equal opportunity to attain their individual goals in education, employment and independent living.

- ***Commitment*** - The environment in which staff operates should reflect a commitment to families and to caring client/staff relationships.
- ***Progress*** - To maintain its role as an essential family resource, Hope Haven must continue to evolve with the needs of our community

Standards of Conduct

Responsibility and accountability for compliance with laws, regulations, and policies rests with each individual employee. This document is intended to clearly communicate the requirement of ethical conduct and compliance with all applicable laws, policies, rules and regulations, including the specifications of contractual relationships. Clinical staff is also expected to adhere to the professional guidelines and ethical standards of the discipline in which they are licensed or certified.

Oversight

Hope Haven's Executive Director has appointed HR and Administrative Coordinator Sherry Allen as the organization's compliance officer. She is the point of contact for monitoring and reporting on matters pertaining to corporate compliance. She is charged with communicating instances of noncompliance to the Executive Director. If the Executive Director is in anyway involved, communication shall go directly to the Board Chair.

Education and Training

Hope Haven's compliance plan is reviewed annually with all employees, and is included as part of new employee orientation. The education and training in compliance includes:

- Individual responsibility for knowledge of and compliance with laws, regulations and policies
- Reporting violations or questionable conduct
- Fraud and abuse
- Consequences of non-compliance

The importance of Hope Haven code of ethics is also incorporated.

Documentation and Disciplinary Action

Each employee is asked to sign a document indicating that they have received and reviewed Hope Haven's compliance plan and code of ethics. All levels of supervisors are responsible for responding to employee questions about compliance. If an area appears unclear, supervisors should contact the compliance officer.

Reporting Violations or Questionable Conduct

- *Employee's responsibility* – It is every employee's responsibility to report suspected violations for laws, regulations, policies or questionable conduct. Individual employees may discuss concerns with their supervisor, the compliance officer, or the executive director. Suspicions should be reported within forty-eight working hours of first identification.
- *Confidential* – All allegations or concerns received through reports will be investigated confidentially.
- *Intentional false accusations* – Intentionally false accusations will result in disciplinary actions, up to and including termination, for the accuser.
- *Protection from repercussions* – Employees reporting questionable conduct in good faith and with positive intentions will not experience any negative repercussions from Hope Haven. Any employee participating in negative behaviors towards the reporting employee will be subject to disciplinary action.

Outcomes

- *Investigation* – All reports of potential violations of laws, regulations, policies or questionable conduct, from any source, shall be presented to the compliance officer and logged. The compliance officer will conduct an investigation within forty-eight working hours of logging the concern. A report of the investigation, including findings and recommendations, will be provided to the executive director within five working days of the beginning of the investigation. The executive director and compliance officer will develop a corrective action plan within forty-eight working hours of the completion of the investigation.
- *Corrective action* – The corrective action plan will focus on implementing changes in internal processes to improve, prevent, or detect compliance inadequacies. The executive director will meet with all of the parties involved within Hope Haven and explain the corrective action plan within forty-eight

working hours of its completion.. The plan may include one or more of the following elements:

- Specific areas requiring compliance attention
 - Requirement of additional training
 - Change in policies and procedures
 - Further audit or investigation
 - Disciplinary action
- *Obligation to report* – If the investigation produces credible evidence that provides a reasonable basis to conclude that a violation of law has occurred, Hope Haven will notify the appropriate legal authorities. Overpayments identified through internal or external reviews will be refunded promptly to payers.

Disciplinary Action and Appeal

- *Disciplinary action* - Hope Haven will impose disciplinary action on employees who fail to comply with applicable laws, regulations, and policies. The seriousness of the violation will determine the level of the disciplinary action in accordance with Hope Haven's progressive discipline policy (Human Resources # 11.0)
- *Appeal* – Appeals of disciplinary action shall be handled in accordance with Hope Haven's grievance procedure (Human Resources # 12.1)