

Marc Center of Mesa, Inc. Corporate Compliance

Marc Center's Corporate Compliance Program

PURPOSE: To establish and publish the official policy of Marc Center of Mesa, Inc. regarding the organization's corporate compliance program and plan.

POLICY: Marc Center of Mesa, Inc. is dedicated to the delivery of behavioral health care and services to individuals with disabilities in an environment characterized by strict conformance with the highest standards of accountability for administration, clinical, business, marketing and financial management. Marc Center's leadership is fully committed to the need to prevent and detect fraud, fiscal mismanagement and misappropriation of funds and therefore, to the development and implementation of a formal corporate compliance program to ensure ongoing monitoring of and conformance with all legal and regulatory requirements. Further, Marc Center is committed to the establishment, implementation and maintenance of a corporate compliance program that emphasizes (1) prevention of wrongdoing – whether intentional or unintentional, (2) immediate reporting and investigation of questionable activities and practices without consequences to the reporting party and (3) timely correction of any situation which puts the organization, its leadership or staff, funding sources or consumers at risk.

PROCEDURE: By formal resolution, Marc Center's Board of Directors has delegated overall responsibility for the Corporate Compliance Program to the President/Chief Executive Officer (CEO). Marc Center's President/Chief Executive Officer will formally designate a Corporate Compliance Officer, 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 but not necessarily limited to, scheduling team meetings, reporting on team activities and making recommendations to the President/CEO and Board of Directors as required; (2) develop, implement and monitor – on a regular and consistent basis – the organization's corporate compliance plan, including all internal and external monitoring, auditing, investigative and reporting processes, procedures and systems; (3) prepare, submit and present periodic reports to the President/CEO and/or Board of Directors as may be required to provide clear, timely and relevant communication to the organization's leadership for corporate compliance oversight; and (4) coordinate development, implementation, monitoring and improvement of the organization's formal corporate compliance plan.

The CCO shall submit an annual report to the President/CEO and/or Board of Directors. Annual reports will, at a minimum, include: (1) a summary of any and all allegations,

investigations and/or complaints processed in the preceding twelve (12) months in conjunction with the corporate compliance program, (2) a complete description of all corrective action(s) taken, and (3) any recommendations for changes to the organization's policies and/or procedures and the results of those recommendations.

In performance of his/her duties, the CCO shall have direct and unimpeded access to the President/CEO, Board of Directors and the organization's accounting/auditing firm and/or legal counsel for matters pertaining to corporate compliance. In addition, the CCO shall be a sitting member of Marc Center's Audit Committee.

As part of corporate compliance plan development and implementation, the CCO shall schedule, coordinate and monitor regular and periodic reviews of risk areas by competent persons external to the organization. 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.