

## **Policy and Procedure: Corporate Compliance**

### **Topic: Role and Responsibilities of the Compliance Officer and Compliance Committee**

#### **Purpose:**

OCO is committed to the highest standards of ethics, professional service and quality health and human services as well as its steadfast compliance with all legal and regulatory requirements. The Code provides guidelines for behavior that will assure that OCO lives up to its commitments.

#### **Policy:**

1. The Compliance Officer is responsible for overseeing the implementation of the compliance plan.
2. The Executive Director, Senior Management members and the Compliance Officer appoint members to the Corporate Compliance Committee. The committee is to advise and assist the Compliance Officer with the implementation of the Compliance Plan.

#### **Procedures:**

The Corporate Compliance Officer shall be responsible for the following:

1. Overseeing the implementation of the compliance plan
2. Reviewing and revising the agency's procedures to conform to changes in the law
3. Developing and executing training programs for the staff on compliance issues
4. Provides oversight to ensure that independent contractors and agents retained by the agency are aware of its compliance policies
5. Assist financial management staff in monitoring internal practices and external audits to identify potential non-compliant issues
6. Implementing policies to encourage confidential reports or problems or suspected violations
7. Conducting internal investigations (refer to Appendix A) in response to any such reports and adopting appropriate corrective actions
8. Analyze the regulatory environment where the agency does business, including legal requirements in which it must comply
9. Review and assess existing policies and procedures that address risk areas for possible incorporation into the Compliance Plan
10. Works with departments to develop standards and policies and procedures that address specific risk areas and to encourage compliance according to legal and ethical requirements.

BOD Approval: 10/02/2007

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Policy Council Approval: Pending

Amended: N/A

Effective: 10/01/2007

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The compliance committee assists the compliance officer in the duties as assigned. The committee advises the compliance officer and provides assistance in analyzing policy options and conducting investigations when necessary.

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