

ENVISION – POLICY

SUBJECT: CORPORATE COMPLIANCE/FRAUD, WASTE, ABUSE AND REPORTING

REFERENCES: The Deficit Reduction Act of 2005, Section 6032; United States Code, Title 31, Chapter 38; United States Code, Title 31, Sections 3729 Through 3733

EFFECTIVE DATE: 6/5/07

REVIEWED: 1/10, 11/10

PRIOR REVISION DATE:

APPROVED BY BOARD OF DIRECTORS (SIGNATURE):



It is the policy of Envision to deliver services in an environment characterized by strict conformance with the highest standards of accountability for administration, programs, business, marketing, human resources, and financial management. Envision'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:

- Prevention of wrongdoing - whether intentional or unintentional.
- Immediate reporting and investigation of questionable activities and practices without consequences to the reporting party.
- Timely correction of any situation that puts the organization, its leadership or staff, funding sources, or consumers at risk.
- Assures conformance with the terms and conditions of Federal, State, Local or private contractual agreements including but not limited to the provisions of DRA Section 6032.

ENVISION – PROCEDURE

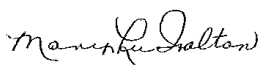
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EFFECTIVE DATE: 11/1/10

REVIEWED: 1/10, 11/10

PRIOR REVISION DATE: 4/23/07

APPROVED BY EXECUTIVE DIRECTOR (SIGNATURE): 

The Board of Directors has delegated overall responsibility for the Corporate Compliance activities to the Executive Director who shall appoint a Corporate Compliance Officer who shall be an individual without conflict of interest and capable of independently reviewing and responding to issues of Corporate Compliance. The Corporate Compliance Officer shall oversee Corporate Compliance activities and will formally designate other members of the organization's staff, board, or community members as necessary to adequately monitor the organization's corporate compliance program, and provide periodic and annual reports to the Executive Director and the Board of Directors on matters pertaining to the program.

The Finance and Administration Director will serve as the Corporate Compliance officer for the organization. The Corporate Compliance Committee will be comprised of the Executive Director, the Finance and Administration Director and the Case Management Director.

CORPORATE COMPLIANCE OFFICER

The Corporate Compliance Officer shall:

- Coordinate the organization's corporate compliance activities 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.

- 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.

- Prepare, submit and present periodic reports to the Executive Director and the Board of Directors as may be required to provide clear communication to the organization's leadership for corporate compliance oversight. These reports will be prepared at least on an annual basis.

- ❑ Provide the Board of Directors with a timely summary of the findings of all external audits, program reviews, and accreditation actions in a timely manner
- ❑ As part of the complainant review process, coordinate with the agency Code of Ethics.

The Corporate Compliance Officer shall submit an annual report to the Executive Director and the Board of Directors. Annual reports will include, at a minimum:

- ❑ A summary of all allegations, investigations and/or complaints processed in the preceding 12 months in conjunction with the corporate compliance program.
- ❑ A complete description of all corrective action(s) taken.
- ❑ Any recommendations for changes to the organization's policies and/or procedures.

In the performance of his/her duties, the Corporate Compliance Officer shall have direct and unimpeded access to the Executive Director, Board of Directors and the organization's auditing firm.

REPORTING AND RESPONSE

Members of the Envision staff have the responsibility to report any wrongdoing through the Corporate Compliance Program. We strongly encourage the employee to inform their supervisor as the first option for reporting, unless the supervisor is directly involved in the misconduct. Employees may also report any concern directly to the Executive Director or the Corporate Compliance Officer.

The community at large is also encouraged to report wrongdoing on matters involving Envision.

Matters related to Envision involving responding to subpoenas, search warrants, investigations and other legal actions should be referred to the Executive Director, by the Corporate Compliance Officer, who will assess the situation and proceed in a lawful manner. Envision will comply, communicate, and cooperate with appropriate organizations or individuals possessing legal authority for access to records, files, or reports pursuant to corporate compliance. If the subpoena calls for confidential records, then the statutes, rules and regulations that apply to the records being sought will be examined. Every effort will be made to ensure appropriate consent to disclosure is obtained and to safeguard confidential information.

The Corporate Compliance Officer's responses to reported instances are to be made within 15 days. Responses that require a length of time in excess of the 15 days will be

granted an additional 15 days. The Corporate Compliance Officer will notify the Corporate Compliance Committee of cases that require an additional 15-day period.

METHODS OF CONTACT

Telephone: Any complainant may call the Corporate Compliance Officer to report issues of fraud, waste, and/or abuse. This allows for anonymity of the caller. The Corporate Compliance Officer will return all calls within 48 hours (weekdays) of the call. The Corporate Compliance Officer will proceed as appropriate. The toll free number is 1-888-695-5883.

Mail: A written reporting form will be available at all sites at all times for complainants to disclose wrongdoings. All information should be completely filled out and submitted through the mail to the Corporate Compliance Officer. Complainants are encouraged to disclose their identity, but they may remain anonymous. When submitting anonymously, the complainants should establish a four-digit identification code to identify himself/herself on the report. The complainants must contact the Corporate Compliance Officer within one week to determine whether any additional information is needed. For anonymous reports, the Corporate Compliance Officer will recognize the caller by the assigned identification code.

ALTERNATIVE REPORTING PROCESS:

If the Corporate Compliance Officer is the subject of possible unethical or improper conduct, the complainant is to file the report with the Executive Director, or any member of the Corporate Compliance Committee.

RECORDS

The Corporate Compliance Officer shall maintain a record of all reported issues and the findings of any resulting investigation or proceeding.

TRAINING

The Corporate Compliance Officer shall see to the development of initial training for all employees. Employees are encouraged to ask questions throughout the orientation process to ensure that they understand the standards of the program. Upon completion of orientation each employee shall complete and sign an acknowledgement of training that will be placed in their personnel file.

The Corporate Compliance Policy will be publicly posted on the Envision web site and at each physical location.

RETRIBUTION

The organization shall not take corrective action against any employee for merely reporting what the employee reasonably believes to be a violation of this program. However, the organization may take disciplinary action against an employee on the basis relating to reporting. First, an employee who knowingly fabricated, distorted, exaggerated, or minimized a report of wrongdoing to either injure someone else or to protect himself/herself or others and/or second, an employee whose report contains admissions of personal wrongdoing will not be guaranteed protection from corrective action. The organization generally will give positive weight to self-confession in determining corrective action; but the extent depends on factors such as whether the employee's conduct was previously known to the organization, whether discovery of the conduct was imminent, and whether the confession was complete and truthful.

ENFORCEMENT

The Executive Director, with input from the Corporate Compliance Committee, will handle all corrective action for violations of the program. The Executive Director may consider the following circumstances:

- The employee promptly reported his/her own violation.
- The employee's own report constituted the Corporate Compliance Officer's first notice of the violation and the employee's involvement.
- The employee cooperated fully in the investigation and correction of the violation.

Violations of this Policy and Procedure may have severe consequences, including, but not limited to, civil and criminal penalties as allowed under applicable federal and state laws, including the federal False Claims Act.



CORPORATE COMPLIANCE CHECKLIST

The following statements represent Envision checklist for corporate compliance. All employees are required to understand and abide by the following statements.

1. I will conform to all policies of accountability for administration, service delivery, ethical business practices, marketing, human resources, and financial management. If I am unsure of how to proceed with a particular issue, I will contact my supervisor, the Corporate Compliance Officer, or any member of the Corporate Compliance Committee.
2. I will abide by the Envision Code of Ethics.
3. I will report any incident I become aware of involving fraud, fiscal mismanagement, misappropriation of funds, waste, or abuse to my supervisor, the Corporate Compliance Officer, or any member of the Corporate Compliance Committee.
4. I understand that Envision's Corporate Compliance Committee will monitor all aspects of the organization to ensure compliance with all legal and regulatory requirements.
5. I understand that I can report questionable activity and practices without consequences to myself.
6. I will not knowingly fabricate, distort, exaggerate, or minimize a report of wrongdoing to either injure someone else or to protect others or myself.
7. I understand that if I am part of the questionable activity, there may be consequences to myself.
8. I understand that the Corporate Compliance Committee will respond to all questionable activities per the prescribed timetable.
9. Reporting of questionable activities may be reported anonymously via telephone at 1-888-695-5883 or mail (see corresponding form).

As an Envision employee, I agree to comply with the above statements.

Employee Signature

Date