

CORPORATE COMPLIANCE PLAN

Woodland Centers, Inc.

March 2003

(Revised July 2007)

STATEMENT of CORPORATE COMPLIANCE

Woodland Centers, Inc. is committed to conducting its business activities in an ethical and forthright manner and within the letter and spirit of all applicable laws, standards, and regulations. To achieve this commitment, Woodland Centers, Inc. has adopted a Code of Ethics to help employees understand and recognize their ethical and legal responsibilities. In addition, Woodland Centers, Inc. has developed policies and procedures relating to its business operations. Collectively, the Code of Ethics and selected policies and procedures from the agency Policy Manual form the Woodland Centers, Inc. Corporate Compliance Plan.

In addition, the Board of Directors has created a Compliance Committee which shall include the following membership: Executive Director, Clinical Director, Fiscal Director, Compliance Director, Manager of Human Resources, and Safety Officer. The Compliance Committee is responsible for ensuring that:

- Woodland Centers, Inc. has established written policies and procedures addressing the legal and ethical issues confronting WCI.
- The policies and procedures are updated annually and are effectively communicated to all applicable groups through training programs, written communication including memoranda and newsletters, staff meetings, and other appropriate means.
- Woodland Centers, Inc. takes all reasonable measures to hire, retain and promote employees who comply with the law and WCI policies and procedures.
- Procedures have been established and implemented to monitor and audit compliance with all applicable laws, standards, and regulations.
- Procedures are in place to allow employees to report violations of the law, the Code of Ethics, or WCI policies and procedures without fear of retribution.
- Investigations of alleged violations are promptly and properly investigated and addressed.
- Woodland Centers, Inc.'s policies and procedures are consistently enforced through appropriate disciplinary measures.
- Woodland Centers, Inc. has taken steps to respond appropriately to any misconduct that may occur and to prevent its recurrence.

The Compliance Committee shall meet quarterly. Minutes of each meeting will be prepared and maintained. The Compliance Committee has final jurisdiction over the interpretation of the Corporate Compliance Plan including the Code of Ethics and WCI policies and procedures.

Adopted by the Board of Directors:

_____ Date: _____
Signature of Board Chair

_____ Date: _____
Signature of Executive Director

WOODLAND CENTERS, INC. Policy Manual	APPROVED:	POLICY NO. WCI-A-202
	CONCURRED:	EFFECTIVE DATE: 09/2002
		REVISION DATE: 07/2002
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I. SUBJECT: Corporate Compliance

II. APPLICABILITY: To all employees, trainees, contractors, and Board members of WCI.

III. PURPOSE: To prevent, detect, report, and investigate all allegations of wrongdoing, whether intentional or unintentional; to establish guidelines for the regular review of the agency's contracts, billing and coding procedures, billing records, contractual requirements, and legal requirements; to ensure compliance with all applicable laws, standards, and regulations.

IV. POLICY STATEMENT: It is the policy of Woodland Centers, Inc. to develop and maintain a Corporate Compliance Plan in order to reduce the agency's risk of engaging in practices that violate the law.

V. PROCEDURES

- A. The agency's Board of Trustees shall adopt a formal resolution on corporate compliance.
- B. WCI will develop and maintain a Corporate Compliance Plan which will include, at minimum, the following:
 1. Written standards of conduct (Code of Ethics)
 2. Designation of a Compliance Officer
 3. The process for screening applicants and background checks
 4. Compliance training for employees
 5. Compliance auditing, including risk assessment, internal reviews and audits, provisions for reporting violations including anonymous reporting.
 6. Investigation procedures
 7. Disciplinary consequences for violations
 8. Periodic reviews to identify and correct deficiencies.
- C. The Compliance Director will serve as the agency's compliance officer with regard to this policy and the Corporate Compliance Plan.

Questions regarding this policy should be directed to the Compliance Director.

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- V. Fraud and other Fiscal Misconduct (WCI-F-502)
- VI. Privacy, Use, and Disclosure of Protected Health Information (WCI-M-700)
- VII. Employment Practices (WCI-P-305)
- VIII. Pre-employment Requirements (WCI-P-307)
- IX. Safety (WCI-S-600) – See also the current Disaster and Safety Manual
- X. Training and Development (WCI-P-321)
- XI. Appendices
 - Compliance HOTLINE
 - Compliance Investigation Protocol

NOTE: In addition to the core policies listed above, Board members, employees, trainees, and contractors of Woodland Centers, Inc. are responsible for compliance with all applicable laws, standards, regulations, and agency policies and procedures. Violations may result in disciplinary action up to and including removal.