

CORPORATE COMPLIANCE POLICY

Purpose:

To establish and publish Clearbrook's official policy regarding the organization's Corporate Compliance Program and plan.

Policy:

It shall be the policy of Clearbrook to deliver human services in an environment characterized by strict conformance with the highest standards of accountability for administration, programmatic, clinical, business, marketing and financial management. Clearbrook'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 of and conformance with all legal and regulatory requirements. Clearbrook 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 investigating of questionable activities and practices without consequences to the reporting party; and,
3. Timely correction of any situation which places Clearbrook, its leadership or staff, funding sources, or persons served at risk.

It shall be the policy of Clearbrook for employees to report any possible violations or suspicions of violations of law or ethical standards. Clearbrook shall adhere to a no-reprisal approach for employees who report suspicions or allegations of waste, fraud, abuse or other wrongdoing.

Procedure:

It shall be documented by formal resolution that Clearbrook's Board of Directors shall delegate overall responsibility for the Corporate Compliance Program to the President. The President shall:

1. Formally designate a Corporate Compliance Officer (herein referred to as CCO);
2. Monitor Clearbrook's Corporate Compliance Program; and,
3. Shall provide period and regular reports to the Board of Directors on matters pertaining to the program.

The CCO shall:

1. Chair Clearbrook's corporate compliance team comprised of the organization's administrative team and serve as Clearbrook's primary point of contact for all corporate compliance issues, including

- scheduling team meetings, reporting on team activities, and making recommendations to the President and Board of Directors as required;
2. Develop, implement and monitor on a regular and consistent basis, Clearbrook'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 and/or Board of Directors as may be required to provide clear communication to Clearbrook's leadership for corporate compliance oversight; and,
 4. Coordinate the development of Clearbrook's formal corporate compliance plan.

The CCO shall submit an annual report to the President and/or the Board of Directors. At a minimum, the annual report shall include:

1. A summary of all allegations, investigations and/or complaints processed in the preceding twelve months in conjunction with the Corporate Compliance Program;
2. A complete description of all corrective actions(s) taken; and,
3. Any recommendations for changes to Clearbrook's policies and/or procedures.

In the performance of duties, the CCO shall have direct and unimpeded access to the President, the Board of Directors and Clearbrook's accounting firm and/or legal counsel for matters pertaining to corporate compliance.

As part of corporate compliance plan development, the CCO shall monitor periodic reviews of risk areas by competent persons external to Clearbrook. Such reviews shall be conducted as a means of ensuring ongoing conformance with billing, accounting, and collection regulations imposed by the federal government and other third party funding sources. These reviews shall augment Clearbrook's annual external fiscal audit and provide an additional internal measure to ensure conformance with billing and coding policies and practices that shall withstand the scrutiny of any regulatory audit or examination.

The Vice Presidents of Finance, Human Resources, Information Technology, Communication and Events Planning, and the Director of Operations shall develop performance measures in order to measure, collect data and analyze data toward the outcome of business function improvement of the organization. Performance measures shall reflect functions of Clearbrook's business activities and practices in order to protect the organization's assets, maintain its viability, and position itself as the quality Expectations of persons served and stakeholders change. Performance measures shall:

1. Document the commitment to exercising corporate responsibility in order to advocate for persons served, promote ethical business practices, and develop efficiency as an organization.

2. Serve as indicator targets designed to aid in the strategic positioning of the organization, support the actions activities for improving the business functions and service delivery of the organization, and in the decision making and improvements in services.
3. Be shared with stakeholders.

As such,

1. The CCO shall conduct a quarterly sampling to evaluate the internal controls and activities and,
2. The CCO shall submit a quarterly report of the findings to the President.

Reporting Suspicions or Allegations of Waste, Fraud, Abuse or other Wrongdoing

Employees shall not need to be certain that a wrongdoing has occurred; reasonable belief of the possibility of a wrongdoing shall be sufficient. Suspicions or allegations of waste, fraud, abuse or other wrongdoing may be reported to the CCO directly, in writing (**see Attachment A**) or via the Corporate Compliance Hotline (**847.385.5301**). As applicable and to the greatest extent possible, the confidentiality of the employee making the report shall be protected. Retaliation in any form against any individual who in good faith reports a violation, even if the report is mistaken, or assists in the investigation of a reported violation shall be reported immediately and shall be subject to disciplinary action. In the event that the possible wrongdoing involves the CCO, the reporter shall contact the President of Clearbrook. Upon receipt of an a suspicion or allegation, the CCO shall have the right, as applicable, to contact Clearbrook's legal counsel, local authorities, or any other external entity that may be relevant to the possible wrongdoing. It shall be the responsibility of the CCO to investigate any report received directly or made to the Hotline within seventy-two (72) hours of receipt and to provide a written response of finding within five (5) working days of receipt. The CCO's written response shall be presented to the President for review and response.