

POLICY AND PROCEDURE DEVELOPMENT – Policy and Procedures Corporate Compliance Program

Purpose

To establish a process for the development, revision, editing, and implementation of policies and procedures for areas that: 1) Pose risks for non-compliance with laws and regulations, and 2) Promote compliance with the Code of Ethical Conduct.

Scope

This policy and procedure applies to the development, revision or retirement of all ERC policies and procedures. The ERC Board of Directors is responsible for approving all policies and both the policy and the procedures for the DDS Programs which define Eligibility criteria, Readmission criteria, and transition/discharge/exit criteria.

Policy

1. All departments must have written policies and procedures that address issues related to compliance with laws and regulations in their areas. These policies and procedures must be current and accessible to affected employees, Board of Directors, volunteers, and as applicable, persons served.
2. Department employees at all levels are responsible for identifying activities within their areas that should be documented as policies and procedures.
3. The Corporate Compliance Committee and the appropriate sub-committee of the Board of Directors will receive for approval all policies and required procedures.

Procedures: Section I – Development or Revision of Policies and Procedures

1. A need for the development of a new policy and or procedures or the revision of an existing policy and or procedure has been identified.
2. The attached template will be used for policies and procedures. The template describes the type of information that should go into each section. The Corporate Compliance Officer is available for assistance.

Procedures: Section II - Approval

1. The completed or revised policy and or procedure must be reviewed and approved by the affected department Director(s) prior to submission.
2. All approved policies will be reviewed by the appropriate board committee. Both the policies and procedures related to the DDS Programs which define Eligibility criteria, Readmission criteria, and transition/discharge/exit criteria must also be approved. When possible, the Corporate Compliance Officer will attend this board committee meeting and will present the policy and or procedure.
3. The board committee will either recommend further revisions or will provide approval and authorize implementation/distribution. If revisions are recommended, the policy and or procedure will be resubmitted to the board committee Chairperson. The Chairperson has the authority to approve the revised document or to recommend it for resubmission to the committee.

Procedures: Section IV – Retiring an Existing Policy and Procedure

1. A member of the senior management team must make a written request to the Corporate Compliance Committee to retire an existing policy and or procedure.
2. The same process for approving new policies and procedures or revising existing policies and procedures will be utilized.

3. Once the board committee approves, the Policy and or Procedure will be moved to a folder in the Historical Drive.

Procedures: Section V – Annual Review

1. Each department will review all policies and procedures affecting their department annually as scheduled by the corporate compliance officer.
2. The department should prepare revisions, retirements, and new policies/procedures as required based on the annual review, or sooner if needed.

Procedures: Section VI – Implementation of Policies and Procedures

1. The Director of Operations and the affected Program Director(s) will sign off on all policies and procedures indicating they have been approved and update the ERC website with the newly approved policies and procedures.
2. The affected Department Directors will ensure proper education of his / her employees on the policy and procedure as well as proper implementation.
3. The Corporate Compliance Officer is available to assist with education of affected employees and will conduct Quality Assurance checks as needed to ensure proper implementation.

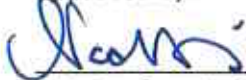
Policy and Procedure Format/Template

See attached for recommended format/template.

Review/Revision/Approval Information

- List all review/revision dates made by P&P Review Committee: 10/2010, 10/2014, 2/2017, 12/2018

- Approved by:



Natasha Dennis, Director of Operations

01/11/19

Date



Cathy Obana, Corporate Compliance Officer

1/11/19

Date

- Reviewed/Approved by Board of Directors Committee (if required):

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**<HEADING TITLE> – <Policy and/or Procedures>
<Program>**

Purpose

Provide a rationale for the purpose of this policy/procedure. Avoid using abbreviations or acronyms in this section.

Scope

- To whom does this policy/procedure relate?
- If this policy/procedure applies in some situations, but not others, explain here.
- Any special certifications or skill levels required?

Definitions

- Special terminology, including acronyms, would be detailed here.

Policy

- Policy deals with the “what” and the “why”.
- Not all procedures will have a corresponding policy.
- Make reference to corresponding policy if there is one.

Procedures

- Procedure deals with the “how”.
- Guidelines:
 - Use outline method.
 - Text is to begin at very left margin of table.
 - Use position titles only.
 - Restrict to 2 pages or less if possible.
 - Include details of related documentation which should be read in conjunction with this policy/procedure. For example, you may make reference to another procedure or to a form.

Review/Revision/Approval Information

- List all review/revision dates made by P&P Review Committee: <list all dates for historical perspective>

- Approved by:

Executive Director, or Designee

Date

Program Director

Date

- Reviewed/Approved by Board of Directors Committee (if required): <Just list most current date>

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