DePaul Corporate Compliance
Policy Development, Approval, and Maintenance Policy

Purpose:
The Policy and Procedure provides clear direction for the process of developing and maintaining policies and establishes a process that promotes effective and timely policy development and review.

Policy:
It is the policy of DePaul (sometimes referred to as "Organization" or "the Organization") to establish a standardized process for policy development, approval, revision, and implementation.

Regulatory References:
Social Service Law 363-D
18 NYCRR Part 521

Procedures:
1. Policies shall be developed and/or revised to meet legal and regulatory requirements and to comply with other DePaul policies.

2. All DePaul policies will contain the required header information:
    - Title – Name of the policy.
    - Issue date, effective date, and all revision dates.

3. All DePaul Policies will contain required sections to include:
    - Policy – Brief description of the policy.
    - Purpose – A brief description of why the Policy is being promulgated and/or what it seeks to accomplish.
    - Procedure – Detailed procedure to be followed to implement the policy appropriately.
    - Attachments – Additional forms associated with the policy.
    - References and Regulations – Regulatory reference numbers (external), other guidance documents and/or training modules.

4. All DePaul policies are owned by the department/program administrator or individual responsible for the policy implementation and oversight. The Policy Owner shall be responsible for recommending the timely development, review, revision, and implementation of new and existing policies relating to their respective areas of accountability.

5. All newly created or revised policies will be approved by the appropriate Policy Owner and/or appropriate administrator and presented to the Compliance Committee and the Board of Directors as required.

6. The Compliance Committee will be responsible for the overall coordination and implementation of any new or revised policy. The President and other Senior Management will be consulted as needed throughout the process of developing or revising any policy and must review all policies prior to approval to ensure compliance with legal and regulatory requirements and other DePaul policies.

7. After review and approval from the Compliance Committee all newly created policies will be issued to the affected individuals as required. If required to be approved by the Board of Directors, this will occur prior to the policy being issued. policy.

8. If applicable approved policies will be available on the DePaul internet to independent contractors and agents within 10 business days of final approval.

9. Policies, as they are revised or replaced, shall not be discarded.

10. All policies will be reviewed annually by the Policy Owner or designated party to determine if there are any revisions that are appropriate or required. If there are necessary revisions to the policy, the updated policy will follow the workflow for approval.

Sanction Statement:

Non-compliance with this policy may result in disciplinary action, up to and including termination.

Compliance Statement:

As part of its ongoing auditing and monitoring process in its Compliance Program, DePaul will review this policy based on changes in the law or regulations, as DePaul's practices change, and, at minimum, on an annual basis. Additionally, this policy will be tested for effectiveness on an annual basis or more frequently as identified in accordance with DePaul's Compliance Program. Testing will include but is not limited to ensuring that the policy is appropriately followed; the policy is effective; the policy has been disseminated to all Affected Individuals, who will also be notified of any updates or changes.
Tracking of the criteria above and results of this testing will be completed by the Compliance Officer, or designee. Additionally, results will be reported to the Compliance Committee and Governing Body on a regular basis.

Record Retention Statement:

DePaul will retain this policy and all subsequent revisions, and any related documentation will be retained for a period of, at minimum, six years.