DePaul Corporate Compliance
Role and Responsibilities of the Compliance Committee

Purpose:

DePaul (sometimes referred to as "Organization" or "the Organization") is committed to the operation of an effective Compliance Program. Therefore, DePaul established the Compliance Committee to monitor results of the compliance functions and determine DePaul's strategy for promoting compliance.

For purposes of this Policy, the term "Affected Individuals" includes all persons who are affected by the required provider's risk areas including the required provider's employees, the president and other senior administrators, managers, contractors, agents, subcontractors, independent contractors, and governing body and corporate officers.

Policy:

It is the Policy of DePaul to ensure the Organization maintains an effective Compliance Program in compliance with regulatory standards. This Policy defines the roles and responsibilities of the Compliance Committee and their duty to help ensure DePaul has an effective Compliance Program.

Regulatory Reference:

Social Service Law 363-D
18 NYCRR Part 521

Procedures:

1. The Compliance Committee is established to advise and assist the Compliance Officer with the implementation of the Compliance Program. The Compliance Committee will report directly to the President and Board of Directors.

2. The Compliance Committee will be comprised of Senior Leadership, at minimum.

3. The Compliance Committee will meet on a regular and routine basis, but at minimum quarterly. Meeting minutes will be recorded. The Compliance Officer will maintain the minutes of all meetings.

4. The Organization will develop and implement a Compliance Committee Charter. The Charter will outline the Compliance Committee's duties and responsibilities, membership, designation of a chairperson, and frequency of meetings.

5. The Compliance Committee will review and update the Compliance Committee Charter at least annually.

6. Affected Individuals will be introduced to the role and responsibilities of the Compliance Committee as part of the Compliance Program education and training.

7. The Compliance Committee is responsible for the following:
    - Analyzing the regulatory environment where DePaul does business, including legal requirements with which it must comply.
    - Reviewing and assessing existing policies and procedures that address risk areas for possible incorporation into the Compliance Program.
    - Reviewing and monitoring Compliance Program training and education to ensure they are effective and completed in a timely manner.
    - Ensuring that the Organization has effective systems and processes in place to identify Compliance Program risks, overpayments, and other issues and has effective policies and procedures for correcting and reporting such issues.
    - Working with departments to develop standards and policies and procedures that address specific risk areas and to encourage compliance according to legal and ethical requirements.
    - Coordinating with the Compliance Officer to ensure that the written policies and procedures and Standards of Conduct are current, accurate, and complete.
    - Developing internal systems and controls to carry out compliance standards, Standards of Conduct, and policies and procedures.
    - Coordinating with the Compliance Officer to ensure communication and cooperation by Affected Individuals on compliance-related issues, internal or external audits, or any other function or activity.
    - Developing a process to solicit, evaluate, and respond to complaints and problems.
    - Monitoring internal and external audits to identify issues related to non-compliance.
    - Implementing corrective and preventative action plans and follow-up to determine effectiveness.
    - Ensuring the development and implementation of an annual Compliance Work Plan.
    - Advocating for sufficient funding, staff, and resources to be allocated to the Compliance Officer to carry out duties related to the Compliance Program.
    - Ensuring the Organization has appropriate systems and policies in place that effectively identify risks, overpayments, and other areas of concerns including fraud, waste, and abuse.
    - Monitoring and evaluating DePaul's Compliance Program for effectiveness at least annually and making recommendations for necessary modifications to the Compliance Program as applicable.

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.