

<p>WOODLAND CENTERS, INC. Policy Manual</p>	<p>APPROVED:</p> <p>CONCURRED:</p>	<p>POLICY NO. WCI-A-202</p> <p>EFFECTIVE DATE: 09/2002</p> <p>REVISION DATE: 12/2008</p> <p>Page: 1 of 1</p>
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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 Director of Operations will serve as the agency's compliance officer with regard to this policy and the Corporate Compliance Plan. The Executive Director will chair the Corporate Compliance Committee.

Questions regarding this policy should be directed to the Director of Operations or Executive Director.