



## **SUMMARY OF THE CVC COMPLIANCE PROGRAM**

The Compliance Program of Caring Voice Coalition, Inc. (CVC) is designed to assist CVC in preventing, detecting and responding to illegal, improper and unethical conduct. The Compliance Program is designed to serve as a procedural framework for enhancing and monitoring compliance with applicable law, regulation, the CVC Code of Conduct and organizational policies and procedures. The Compliance Program is based on the elements of an effective compliance program set forth in the Federal Sentencing Guidelines Manual and applicable Department of Health and Human Services Office of Inspector General (OIG) guidance.

### **The Compliance Program is designed, implemented and maintained to:**

1. Establish a culture that promotes prevention, detection and resolution of instances of conduct that do not conform to all applicable laws, regulations, the Code of Conduct, or CVC's policies and procedures.
2. Communicate and demonstrate CVC's commitment to compliance.
3. Guide management and employees in efficient management and operations.
4. Provide ethical leadership and install systems to facilitate ethical and legal conduct.
5. Provide information, guidance and education regarding ethics, regulatory requirements and standards of practices.

### **The Compliance Program has the following key elements:**

6. Written standards of conduct, including the Code of Conduct, and CVC's policies and procedures.
7. Compliance director and a Compliance Committee.
8. Regular, effective education and training.
9. Reporting channels to field compliance questions and concerns, and to report complaints anonymously, if preferred, and without fear of retaliation.
10. Monitoring and auditing activities.
11. Publicized disciplinary guidelines to enforce CVC's compliance standards.
12. A mechanism to respond promptly to detected offenses and develop corrective action as necessary.

This detailed Compliance Program was reviewed and approved by the CVC Board of Directors through the Compliance Resolution adopted July 22, 2017.