

Comprehensive Systems, Inc. Corporate Compliance Program

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Comprehensive Systems, Inc.
Corporate Compliance Program

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Corporate Compliance Policy

Comprehensive Systems, Inc. is dedicated to the delivery of services in an environment characterized by strict conformance with the highest standards of accountability for administrative, business and financial management.

The leadership of Comprehensive Systems, Inc. is aware of and fully committed to the organization clearly establishing expectations regarding employee behavior, i.e., to act in a way that always respects laws and regulations and in a manner that will protect the organization's assets from fraud, waste, and abuse. The development and implementation of policies and procedures and other corporate compliance measures will help ensure regular monitoring and conformance with all legal and regulatory requirements.

On April 27, 2006, the Board of Directors of Comprehensive Systems, Inc. passed a resolution directing and authorizing the Executive Director to take all actions necessary to immediately and fully develop and implement a Corporate Compliance Program for the company.

Effective also on this date, the Board passed an additional resolution designating and appointing the Corporate Compliance Director (CCD) for Comprehensive Systems, Inc. The CCD will have direct access to the Executive Director, legal counsel and the Board of Directors as necessary. In addition to development, implementation, and monitoring of the Corporate Compliance Program, the CCD shall be responsible for establishing and chairing the Compliance Committee meetings and submitting periodic reports on the committee's activities and other corporate compliance activities as required.

Corporate Compliance Program Policies and Procedures

Comprehensive Systems, Inc. has adopted policies and procedures implementing the Corporate Compliance Program which includes Detecting and Preventing Waste, Fraud and Abuse and Code of Conduct. All employees of Comprehensive Systems, Inc. will receive training on the policies and procedures of the Corporate Compliance Program and will be required to sign a written acknowledgment that they have received, read and will abide by the policies and procedures outlined in this program. New employees will receive compliance training during orientation. All employees receive compliance training on an annual basis.

Code of Conduct Policies and Procedures

Comprehensive Systems, Inc. has adopted a Code of Conduct, setting forth the legal and ethical standards of the organization, to be followed throughout the organization for the purpose of reducing unlawful or unethical conduct in the workplace. Each year, all employees, board members, and volunteers of Comprehensive Systems, Inc. will receive and review the Code of Conduct. Each will be required to sign a written acknowledgment that he/she has received, read, and will abide by the organization's Code of Conduct. The signed acknowledgment will be maintained by Comprehensive Systems, Inc. in the appropriate file.

Departmental Policies and Procedures

Neither the Corporate Compliance Program nor the Code of Conduct covers all of the detailed policies and procedures adopted by Comprehensive Systems, Inc. to achieve compliance in each area of its operations. Policies and procedures pertaining to specific areas of the organization's operations will be reviewed and, where necessary, amended or created to ensure clarity of and adherence to legal and ethical requirements governing that particular area. Employees affected by these policies will receive training on the policies and procedures specific to their job responsibilities. Departmental policies and procedures are located in each of the respective departments. Questions concerning the location of a particular policy or procedure, or concerning a policy's meaning, should be directed to the department supervisor.

Role of the Corporate Compliance Director

The Board of Directors has designated a Corporate Compliance Director for Comprehensive Systems, Inc. The Corporate Compliance Director has the authority and responsibility for overseeing the development, implementation and maintenance of Comprehensive Systems, Inc.'s Corporate Compliance Program. Ethical and legal behavior, including adherence to all of Comprehensive Systems, Inc. policies and procedures, is not the sole responsibility of the Corporate Compliance Director. All employees play a critical role in the organization's commitment to ethical and legal compliance and to the success of the Corporate Compliance Program.

Employees who suspect or know of any violations, or potential violations, of the Code of Conduct, the Corporate Compliance Program policies and procedures, departmental policies or procedures, or the laws and regulations governing Comprehensive Systems, Inc. are expected to report those violations to their supervisor. Employees, who are not comfortable reporting suspected, known or potential violations to their supervisor, should report those violations directly to the Corporate Compliance Director, the HIPAA Privacy Officer or to any other member of the compliance committee.

Complaints, deemed to be of a personnel nature, will be investigated by the HR Director following the grievance/complaints procedure outlined in either the General Handbook for Non-Administrative Employees or the Administrative/Professional Employee Handbook. Complaints that are of a non-personnel nature will be investigated following the procedure in the Corporate Compliance Program.

Role of the Compliance Committee

The compliance committee is responsible for implementing the activities of the Corporate Compliance Program under the direction of the Corporate Compliance Director. The members of the compliance committee will provide advice on how to achieve the goals and objectives of the Corporate Compliance Program. Committee members are expected to display integrity, confidentiality and professional judgment. The compliance committee consists of eight core members, including the Corporate Compliance Director, Legal Counsel, Associate Director, Executive Director, HR Director, Program Director, QA Director, and Risk Manager. This committee meets on a quarterly basis as a minimum. The committee completed a compliance risk assessment and established a mitigation plan. The compliance plan outlines the priority, funding, timeline and monitoring activities to remove identified risk.

Reporting Concerns of Questionable Conduct

Employees who suspect or know of any violations, or potential violations, of the Code of Conduct, the Corporate Compliance Program policies and procedures, departmental policies or procedures, or the laws and regulations governing Comprehensive Systems, Inc. that are of a non-personnel nature are expected to report those violations utilizing the procedures established in the Corporate Compliance Program. The first step of reporting should be to their supervisor. However, if an employee is not comfortable discussing a concern with his or her supervisor, or the employee is not satisfied with his or her supervisor's response, the employee is expected to take the next step. The concern should then be reported to the Corporate Compliance Director or to another member of the compliance committee.

All reports of a compliance violation will be taken seriously and will be promptly investigated under the direction of the Corporate Compliance Director. To ensure that the Compliance Director has all the information necessary to thoroughly investigate a report, Comprehensive Systems, Inc. strongly encourages direct communication of the concern by an employee to his or her supervisor, to the Corporate Compliance Director, or to another member of the compliance committee. It should be noted that complaints deemed of a personnel nature, will be referred to personnel services. Following an investigation of a reported concern, the Compliance Director or designee will report back the outcome of the investigation to the employee who made the report.

Comprehensive Systems, Inc. has designed a system to help protect the identity of an employee who reports a compliance concern. Every reasonable effort will be made to keep a reporting employee's identity confidential, but complete protection of privacy will not always be possible. It must be understood that there are no absolute guarantees regarding confidentiality once a corporate compliance "report" is submitted. In addition, there are some circumstances under which Comprehensive Systems, Inc. may be required by law to disclose a reporting employee's identity, such as under a subpoena to produce records or give testimony. Employees may also give permission to Comprehensive Systems, Inc. to reveal their identity.

No disciplinary action or retaliation will be taken against an employee who makes a good faith report of a compliance violation. Anyone who retaliates against an employee for reporting a compliance violation will be subject to disciplinary action, up to and including termination. Employees are expected to report any suspected or known violations of the Comprehensive Systems, Inc. confidentiality and non-retaliation policies to the Corporate Compliance Director.

To further promote reporting of compliance violations, Comprehensive Systems, Inc. has established an anonymous reporting system that permits employees and contractors to report concerns on an anonymous basis. This system has been established for those persons who, for whatever reason, are not comfortable taking their concern to their supervisor, to the Corporate Compliance Director or to a member of the compliance committee. Just as any other report, a concern reported through the anonymous reporting system will be investigated under the direction of the Corporate Compliance Director. Because the report was made anonymously, the compliance director will not be able to report back the outcome of the investigation to the employee who made the report.

An anonymous report can be made by completing a Confidential Report of Concern Form and mailing it to the Corporate Compliance Director at the designated address. If a report is made anonymously in writing, it must be sufficiently detailed to provide a factual basis for the allegations in order to allow an appropriate investigation. It must be noted that effective investigation and appropriate resolution of reported concerns are made more difficult by anonymous reports. The possibility exists that an investigation may not be able to be completed due to the anonymity of the report. Employees are urged to identify themselves when making any report.

The above notwithstanding, the filing of a false or intentionally inaccurate Confidential Report of Concern through the anonymous reporting system shall be considered a serious offense. The anonymous reporting system is not intended to provide an opportunity for employees or contractors to get other employees "in trouble", but rather is intended solely as a methodology for the reporting of the violations set forth above. The filing of an intentionally false or misleading report could subject an employee to disciplinary action up to and including termination.

Confidential Report of Concern

The purpose of this form is to report the facts pertaining to any known or suspected violation of the Code of Conduct, the Corporate Compliance Program policies and procedures, departmental policies and procedures, or the laws and regulations governing Comprehensive Systems, Inc. Although we ask you to provide your name, it is not necessary for you to do so if you wish to make an anonymous report. An anonymous report can be made by completing this form and mailing it to the Corporate Compliance Director at Comprehensive Systems, Inc. at the following address: P.O. Box 1186, Mason City, Iowa 50402.

If you do not want to give your name, you may call the Corporate Compliance Director after one week of submitting this report to inquire about the outcome of the investigation. You may be asked detailed questions about the report in order to verify your authenticity. If you do not call, the Corporate Compliance Director will not be able to report back the outcome of the investigation arising out of your report.

If you wish to identify yourself in this report, Comprehensive Systems, Inc. will make every effort to keep your identity confidential. Only the Corporate Compliance Director, and others designated by the Compliance Director to conduct investigations, will have access to your initial report. It must be understood that there are no absolute guarantees regarding confidentiality once a corporate compliance report is submitted. There are some circumstances under which Comprehensive Systems, Inc. may be required by law to disclose a reporting employee's identity. In addition, employees may also give Comprehensive Systems, Inc. permission to reveal their identity.

Please include all the factual details of the suspected violation, however big or small, to ensure the Corporate Compliance Director has all the information necessary to conduct a thorough investigation. Please attach additional pages as needed. The information you provide should include names, dates, times, places and a detailed description of the occurrence that led you to believe a violation of the principles of the corporate compliance program occurred. Please include a copy or a description of any documents that support your concerns.

Disciplinary Guidelines

Members of the organization will be subject to disciplinary action for failure to comply with the legal and ethical standards adopted by Comprehensive Systems, Inc. Strict adherence to the organization's policies and procedures is a condition of employment. Violations of the Code of Conduct, the Corporate Compliance Program policies and procedures or departmental policies and procedures will result in disciplinary action, up to and including termination, as determined on a case-by-case basis.

Comprehensive Systems, Inc. generally follows progressive disciplinary steps in determining the disciplinary action or sanctions to be applied against an employee for violation of the organization's policies and procedures. The range of disciplinary action includes oral or written warnings, suspension from employment and termination of employment. These progressive disciplinary steps are used by Comprehensive Systems, Inc. as a guideline, and should not be construed as prohibiting Comprehensive Systems, Inc. from taking other disciplinary action that it feels, in its sole discretion and judgment, is appropriate under the circumstances. Comprehensive Systems, Inc. reserves the right to terminate an employee at any time, for any lawful reason, with or without warning.

Although disciplinary actions may vary according to the nature and severity of the violation, disciplinary actions will be consistently applied and enforced against all levels of employees who commit similar violations under similar circumstances. In general, Comprehensive Systems, Inc. personnel will be subject to disciplinary action for violating the policies and procedures referenced in this program, failing to report a violation of the policies and procedures referenced in this program, failing to cooperate during an investigation of a suspected violation, and failing to take reasonable steps to detect and correct a violation within an employee's area of responsibility.

An employee's legal and ethical conduct contributes to the success of the Corporate Compliance Program, as well as to the success of the employee's job performance. An employee's adherence to the organization's policies and procedures, including the employee's responsibility to report known or suspected violations, will be assessed and recognized as a part of the employee's performance evaluation.

Monitoring Activities

One of the ways to evaluate the success of the Corporate Compliance Program is to routinely review and assess the activities and operations of the organization. Comprehensive Systems, Inc. has established an On-Site Review Committee composed of management employees who routinely monitor activities within the organization to ensure that employees, contractors and other persons acting on behalf of Comprehensive Systems, Inc. are adhering to the organization's policies and procedures. A form is used to check for HIPAA privacy compliance and to interview staff. The committee did a baseline assessment of all service areas to establish where violations of protected health information were possible. Many of those potential violations were corrected through staff training, or through minimal structural or environmental changes. A schedule and budgeting plan is in place for areas where structural changes or improved technology are required to fully assure that private health information is protected.

Investigations

The Corporate Compliance Director will ensure that a prompt and confidential investigation is conducted in response to a reported concern or other detected violation of the Code of Conduct, the Corporate Compliance Program policies and procedures, departmental policies and procedures or the laws and regulations governing Comprehensive Systems, Inc. All employees are expected to cooperate fully in an investigation. Failure of an employee to cooperate in any investigation may lead to disciplinary action. Retaliation against any employee who cooperates in an investigation is strictly prohibited and will lead to disciplinary action, up to and including termination. Investigations will be conducted as follows:

If the report of concern or a violation is expressed informally (verbally) at the time of the occurrence by the person who observed the activity in question, or through a subsequent communication with the individual's supervisor, the supervisor shall meet with the individual to discuss and review the allegation. The supervisor will take notes of the discussion and pass those notes on to the Corporate Compliance Director. If possible, informal allegations will be resolved within five (5) business days from when the allegations were made. Such resolution shall be reported to the Compliance Director.

If the allegation comes through the formal process of a Confidential Report of Concern, the Compliance Director will be responsible for conducting the appropriate investigation as follows:

- a. Review the Confidential Report of Concern and determine what, if any, additional information is required.
- b. Within 5 days of receipt of the Confidential Report of Concern, meet with the supervisor of the employee involved to determine the scope of the investigation.
- c. Interview the employee involved and review any documents relevant to the allegation.
- d. Within 10 business days of receipt of the Confidential Report of Concern, prepare a written report of the investigation and present the report to the Compliance Committee. After reviewing the report of the investigation, the Compliance Committee will either make a recommendation for additional investigation, or submit the Compliance Director's report to the Executive Director along with a recommendation as to whether the report should be determined to be founded or unfounded.
- e. Any founded allegations will be documented in the employee's personnel file along with a record of any disciplinary actions taken as the result of the investigation.
- f. Any unfounded allegations will be reviewed and discussed, if possible, with the reporting employee and the individual against whom the allegation was made. All documentation regarding unfounded allegations will be destroyed.

Training Certification

Employees and members of the Board of Directors will certify that they have received, read, and been trained in Comprehensive Systems, Inc.'s Corporate Compliance Program. Each will attest to comply with the policies and procedures of the Corporate Compliance Program and understand that a violation of its standards may lead to disciplinary action, up to and including termination of employment and/or appointment to the Board of Directors.

When an employee has fulfilled the above requirements, a certificate designating this completion will be signed by the employee and the trainer, and it will be kept in the employee's personnel file.

When a member of the Board of Directors has fulfilled the above requirements, a certificate designating this completion will be signed by the board member and the Corporate Compliance Director, and it will be kept in the Compliance Director's files.