



## Corporate Compliance Policy

Adopted by the Anderson Center for Autism Board of Trustees: 3/22/07

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### **I. Policy**

Anderson Center for Autism and affiliates (hereafter referred to as ACA) are committed to maintaining full compliance with all applicable federal, state and local laws and regulations, and payer requirements in its provision of services to individuals with autism and other developmental disabilities. It is also ACA's policy to adhere to the Code of Ethics adopted by the Board of Trustees.

### **II. Commitment**

ACA acknowledges its responsibility to conduct its business affairs with integrity based on sound ethical and moral standards. We hold our employees, contractors, and vendors to these same standards.

ACA will continue to measure the effectiveness of our compliance policies and Standard Operating Procedures through monitoring and auditing systems reasonably designed to detect noncompliance by its employees and agents. We will conduct regular, periodic compliance audits by engaging internal and/or external auditors with expertise in all applicable governing statutes, regulations and additional requirements.

### **III. Responsibility**

All employees, contractors, and vendors shall acknowledge that it is their responsibility to report any instances of suspected or known noncompliance to their immediate supervisor, the Chief Executive Officer or the Compliance Officer. Reports may be made anonymously without fear of retaliation or retribution. Failure to report known noncompliance or making reports which are not in good faith will be grounds for disciplinary action, up to and including termination. Reports related to harassment or other staff-related issues will be referred to Human Resources.

### **IV. Policies and Procedures**

ACA will communicate its compliance policies and Standard Operating Procedures to all employees, contractors, and vendors, through mandatory training, contractual language and other written notifications and correspondence. We are committed to updating our policies and Standard Operating Procedures as indicated by changing regulations and requirements.

## **V. Enforcement**

This Compliance Policy will be consistently enforced through identified ACA supervisory interventions including, if appropriate, discipline of individuals responsible for failure to detect and/or report noncompliance.

## **VI. Agency Response**

Noncompliance, whether detected through compliance auditing procedures or confidential reporting, will be addressed in an expedient manner. ACA will take all reasonable steps to prevent further similar violations, including any necessary modifications to the Compliance Plan.

## **VII. Due Diligence**

ACA will, at all times, exercise due diligence with regard to background and professional license investigations for all prospective employees, contractors, vendors, and members of the Board of Trustees.

## **VIII. Corporate Compliance Officer /Committee**

The Corporate Compliance Officer will be appointed by and report to the Executive Director. The Corporate Compliance Officer will provide compliance information to the Board of Trustees through a variety of mechanisms, including regular attendance at scheduled meetings.

ACA will, at all times, maintain a Corporate Compliance Committee appointed by the Corporate Compliance Officer and approved by the Executive Director, with a representative from each of the following departments: Fiscal, Human Resources, Operations, Adult Services, Children's Services, Medicaid Services Coordination, Clinical and Medical.

Adopted: 3/22/07

Amended: 9/22/11