

Draft Policy:

Job Description: Corporate Compliance Officer

Qualifications: The Corporate Compliance Officer will have skills and experience sufficient to identify potential issues within a variety of compliance areas (Finance, Utilization, Program Planning, Licensing, Funding, Agency Policy etc.). The Compliance Officer will be able to remain objective and function independently from other agency departments. The Compliance Officer will be detail oriented and have experience with investigative and reporting procedures.

Accountability: The Corporate Compliance Officer shall be accountable to the CEO and/or Board of Directors.

Duties: The Corporate Compliance Officer's chief duties are planning, implementing and monitoring the Corporate Compliance Program. Coordination of compliance audit activities and communication of expectations and reporting results are the key functions of this position.

The Corporate Compliance Officer will:

- Oversee and monitor the implementation of the Corporate Compliance Program.
- Report to the CEO and Board of Directors on a regular basis to review progress on program implementation and assist with establishing improvement plans.
- Periodically revise and update the program.
- Review employee Standards of Conduct Certification Statements.
- Develop and implement a Compliance training plan.
- Assist the Finance Department in coordinating internal compliance review and monitoring activities.
- Investigate complaints and coordinate action plans with other departments.
- Develop policies and programs that encourage staff to report suspected fraud or impropriety with out fear of retaliation.
- Develop and communicate the objectives of the Compliance Program and report accomplishments ongoingly.
- Access records relevant to compliance monitoring activities and report findings.
- Maintain a log of communications received relevant to compliance.
- Compile reports of calls received, investigations conducted, findings and recommendations developed, action plans established, and progress noted.
- Establish and communicate reporting procedures and reporting modes available (e-mail, voice mail, suggestion box, etc.).
- Interview internal and external customers periodically.
- Analyze utilization patterns.
- Conduct unannounced mock surveys, inspections, audits and investigations periodically to assess staff readiness and to specifically identify where corrective actions are needed.
- Re-evaluate areas of previous deficiency to identify improvements.
- Present written evaluations and reports to the Compliance Committee, CEO and BOD at least annually.