

RESOLUTION OF THE BOARD OF DIRECTORS
(Insert Organization's Name Here)

WHEREAS, (INSERT ORGANIZATION NAME HERE), is dedicated to the delivery of behavioral health care (SPECIFY OTHER SERVICES WHEN APPLICABLE) in an environment characterized by strict conformance with the highest standards of accountability for administrative, business, clinical, financial and marketing management;

WHEREAS, the leadership of (INSERT ORGANIZATION NAME HERE) is aware of and fully committed to the need to prevent and detect fraud, waste, abuse, fiscal mismanagement and misappropriation of funds through the development and implementation of a formal "Corporate Compliance Program"; and

WHEREAS, (INSERT ORGANIZATION NAME HERE) is fully committed to the development and implementation of comprehensive policies, procedures and other corporate compliance measures to provide regular monitoring and conformance with all legal and regulatory requirements.

BE IT RESOLVED, that the Board of Directors (OR OTHER LEADERSHIP WHEN APPLICABLE) of (INSERT ORGANIZATION NAME HERE) met and discussed the development of a corporate compliance plan for the organization on this date. The Board of Directors authorized the President/Chief Executive Officer to take all actions necessary to immediately and fully develop and implement the organization's Corporate Compliance Program, including the engagement of (INSERT ATTORNEY'S NAME HERE OR THE WORDS "LEGAL COUNSEL") for the purpose of assisting in the design and implementation of the Corporate Compliance Program.

IT IS SO APPROVED AND EFFECTIVE THIS DATE.

Typed Name of Board Secretary

Signature of Board Secretary

Date: _____

Approved: _____
Signature of the President of the Board of Directors

POLICY TITLE: Corporate Compliance Program

PURPOSE: To establish and publish the official policy of _____ regarding the organization's corporate compliance program and plan.

POLICY: _____ is dedicated to the delivery of behavioral health care in an environment characterized by strict conformance with the highest standards of accountability for administration, clinical, business, marketing and financial management. _____'s leadership is fully committed to the need to prevent and detect fraud, fiscal mismanagement and misappropriation of funds and therefore, to the development of a formal corporate compliance program to ensure ongoing monitoring and conformance with all legal and regulatory requirements. Further, the organization is committed to the establishment, implementation and maintenance of a corporate compliance program that emphasizes (1) prevention of wrong doing – whether intentional or unintentional, (2) immediate reporting and investigation of questionable activities and practices without consequences to the reporting party and (3) timely correction of any situation which puts the organization, its leadership or staff, funding sources or consumers at risk.

PROCEDURE: By formal resolution, the Board of Directors has delegated overall responsibility for the Corporate Compliance Program to the President/Chief Executive Officer (CEO). The President/CEO will formally designate a Corporate Compliance Officer, monitor the organization's corporate compliance program and provide periodic and regular reports to the Board of Directors on matters pertaining to the program.

The Corporate Compliance Officer (CCO) shall (1) chair the organization's corporate compliance team and serve as the organization's primary point of contact for all corporate compliance issues, including scheduling team meetings, reporting on team activities and making recommendations to the President/CEO and Board of Directors as required; (2) develop, implement and monitor – on a regular and consistent basis – the organization's corporate compliance plan, including all internal and external monitoring, auditing, investigative and reporting processes, procedures and systems; (3) prepare, submit and present periodic reports to the President/CEO and/or Board of Directors as may be required to provide clear communication to the organization's leadership for corporate compliance oversight; and (4) coordinate development of the organization's formal corporate compliance plan.

The CCO shall submit an annual report to the President/CEO and/or Board of Directors. Annual reports will include, at a minimum: (1) a summary of all allegations, investigations and/or complaints processed in the preceding 12 months in conjunction with the corporate compliance program, (2) a complete description of all corrective action(s) taken, and (3) any recommendations for changes to the organization's policies and/or procedures.

In the performance of his/her duties, the CCO shall have direct and unimpeded access to the President/CEO, Board of Directors and the organization's accounting firm and/or legal counsel for matters pertaining to corporate compliance.

As part of corporate compliance plan development, the CCO shall schedule, coordinate and monitor regular and periodic reviews of risk areas by competent persons external to the organization. Such reviews will be conducted as a way to ensure ongoing conformance with billing, accounting and collection regulations imposed by the federal government and other "third party" funding sources. More critically, these reviews will augment the organization's annual audit of its accounting system and provide an additional, internal measure to ensure conformance with billing and coding policies and practice that will withstand the scrutiny of any regulatory audit or examination.

(Insert Date Here)

MEMORANDUM

From: (Insert CEO's Name Here)

To: (Insert name of prospective Corporate Compliance Officer here)

Subj: APPOINTMENT AS CORPORATE COMPLIANCE OFFICER

As per our previous discussions, you are hereby appointed as Corporate Compliance Officer (CCO) for (insert organization's name here). In the performance of your duties, you will be bound by all applicable state and federal guidelines and will have direct access to the President/CEO and members of the (insert organization's name here) Board of Directors as necessary. As CCO, you will be responsible for development, implementation and ongoing monitoring of all policies and procedures to ensure conformance with generally accepted operational and administrative practices regarding corporate compliance. Additionally, you will be responsible for establishing and chairing the organization's Corporate Compliance Team and submitting periodic reports on the team's activities and other corporate compliance activities as required.

Your appointment as CCO is effective this date and will remain in effect until withdrawn in writing.

(President/CEO's Signature

President/CEO's Typed Name