

## **CORPORATE COMPLIANCE PLAN OVERVIEW**

### **Purpose:**

To establish a system whereby potential issues or areas of noncompliance can be reported and corrected.

### **Policy:**

1.E.a.: Resource Management Services shall take reasonable steps to achieve compliance with government rules and regulations and conduct its business using the highest ethical and legal standards. Adherence to the RMS Corporate Compliance Plan Program by all employees is vital to the success of the organization. The Management of RMS is responsible for ensuring that employees are aware of and adhere to the laws and regulations that apply to their job activities and to the provisions stated in the RMS Corporate Compliance Plan. (Clinical/ Compliance Director may be consulted for interpretation and clarification.)

### **Procedure:**

The Resource Management Services Corporate Compliance Plan will include, at a minimum, the following elements:

**Oversight Responsibilities:** The Corporate Compliance Plan will include designation of a Compliance Director who is a high-level official with authority and access. The Clinical/ Compliance Director shall oversee and monitor implementation of the RMS system-wide compliance plan and report to the CEO who reports to the Board of Directors. The Clinical/Compliance Director shall also have the ability to independently investigate risks and act on matters related to compliance for RMS and all of its entities.

**Effective Lines of Communication:** RMS shall provide an open line of communication between the Clinical/Compliance Director and RMS employees. This will include an employee "hotline", written memoranda, and other forms of information exchange. Employees shall be expected to report any suspected violations or irregularities to their supervisor or the Clinical/Compliance Director (Angie Fontenot). If the employee does not feel comfortable with this, the employee may call the RMS Compliance Hotline anonymously at 337-351-5956 or write to: Compliance Director at 184

Williamsburg St., Lake Charles, LA 70605. No adverse action or retribution of any kind will be taken by RMS against an employee because he/she reports in good faith a suspected violation or irregularity by any person other than the reporting employee. RMS shall treat such reports as confidential and protect the identity of the employee making the report.

Whether the report is completed by phone or in writing, the employee shall provide as much detail as possible, including names, dates, places and the specific conduct the employee believes may violate the law or RMS policy. RMS shall take all reports of potential noncompliance very seriously.

Once the report has been received, the Clinical/Compliance Director, along with CEO shall attempt to obtain all information and complete a written report form; shall determine whether the alleged wrongdoing is a violation of state or federal law, RMS policies, the RMS Compliance Plan, or otherwise puts RMS at risk for economic injury or injury to its reputation; working with appropriate parties, will take action commensurate with the gravity of the allegation to determine if the allegation has a basis in fact and what action is to be taken; will respond to the employee directly if the employee's name is known.

**Training and Education:** The RMS Corporate Compliance Plan will include the development and implementation of a training and education program for all employees to include participation upon hire during new employee Orientation, and annually or on an as-needed basis thereafter, as required by RMS, regulatory agencies, and legal entities. Training will include procedures for allegations of fraud, waste, abuse, and other wrongdoing. Documentation of training will be maintained within the Employee Personnel Record.

Members and stakeholders are educated via Member orientation, Member handbook, media means. Stakeholders are educated via RMS web page, and in person interaction with the Community/Legislative Liaison.

**Compliance Policies and Procedures:** The RMS Compliance Plan will include the establishment, approval, and implementation of a **Code of Conduct**. In addition, there will be written policies and procedures that

promote RMS commitment to compliance. Unless otherwise noted, RMS compliance policies will apply to all RMS entities.

**Monitoring and Auditing:** Oversight of the Corporate Compliance Plan, inclusive of internal auditing activities may occur, as needed, and regular reporting to Management of the findings will follow, with effective follow up.

**Enforcement and Discipline:** A policy of progressive discipline will exist as part of the RMS Corporate Compliance Plan. This will be a consistently applied policy, which will be continuously monitored for effectiveness.

**Response and Prevention:** RMS shall have policies and procedures in place to respond to communications from government authorities and regulatory entities regarding potential areas of noncompliance. It will also include preventive measures and actions related to self-monitoring of potential compliance areas.

NOTE: RMS shall not engage in any fund-raising activities.

NOTE: The information in this Corporate Compliance Plan was developed by Viable Solutions, LLC and is copyrighted. The format and some terms have been modified to better fit RMS.