

SERVICES TO ENHANCE POTENTIAL

Corporate Compliance

Program Statement

Corporate Compliance is the process of monitoring the operations of an organization in terms of its adherence to laws, regulations and best practice standards in order to protect the organization from potential illegal or unethical activity.

Services To Enhance Potential (STEP) has established and is fully committed to its Corporate Compliance Program. This program ensures that provided services and all activities of its staff receive ongoing monitoring for conformance with all legal and regulatory requirements. It is important to the Board of Directors, Management and Staff that Services To Enhance Potential (STEP) is viewed as an honest, responsible and respected provider of mental health services.

STEP's Corporate Compliance Program is managed by a Corporate Compliance Team lead by the Corporate Compliance Officer. It is the responsibility of the Corporate Compliance Team to: 1) develop, implement and monitor the organization's corporate compliance plan which is inclusive of employment practices, financial accountability, human resource policies and procedures, governance, physical safety and staff development, 2) investigate all areas of non conformance and recommend corrective action, 3) ensure training expectations are met for all staff and Board members, 4) oversee adherence to the organization's "No reprisal" procedure, 5) report to management staff and the Board of Directors on corporate compliance activity.

The central core of STEP's Corporate Compliance program is the Organization's Code of Ethics, which defines responsibilities and expectations for all persons representing STEP with the knowledge that all must promote and advance the mission of the organization in a manner that shows integrity, a valued reputation and respect for individuals served and families.

As a foundation for its Corporate Compliance Program, STEP is committed to the following principals:

- * The primary goal is the prevention of wrong doing – whether intentional or unintentional
- * There will be no reprisal to anyone reporting questionable activity
- * All reported or suspected wrong doing will be immediately investigated and corrected as applicable. Summary reports of findings and remedial actions will be shared with the governing board.
- * The intent of the Corporate Compliance Policy applies equally to anyone with whom STEP does business
- * The organization maintains the confidentiality and protects the integrity and availability of all PHI in written or electronic form as required by law
- * All financial operations will be subject to internal and external account auditing to ensure reliability and adequacy of its bookkeeping and records
- * The Organization is committed to protecting the rights of individuals served and that all be treated with courtesy, respect and dignity
- * Professionalism is at all times essential to the operations of the Organization.

To the extent that you become aware of or suspect fraud, abuse, waste, or non compliance with any related STEP policies, you must report. For questions you may have about compliance issues or to report on compliance matters, contact STEP's Corporate Compliance Officer at 734.552.0556 or jbridgeforth@stepcentral.org