



Corporate Compliance Plan

Policy #1-3-5

Approved: 5/24

2024

Last Reviewed: 6/08, 11/08, 2/09, 1/10, 2/11, 5/12, 6/13, 4/14, 4/15, 5/15, 8/16, 11/17, 5/18, 3/19, 6/21, 5/22, 6/23, 8/23, 5/24

I. POLICY

It is the policy of Jewish Family Services of Washtenaw County (JFS) to conduct its business in a manner that facilitates quality, efficiency, honesty, integrity, respect and full compliance with applicable laws and regulations.

II. PURPOSE

The purpose of this policy is to establish the formal JFS Corporate Compliance Plan to address potential areas of compliance concerns and to establish a framework for legal and ethical compliance by JFS and its employees.

III. DEFINITIONS

Compliance - acting in accordance with a set of standards, regulations, rules, statutes, policies and procedures mandated by an outside authority or by JFS.

IV. STANDARDS

A. The JFS Corporate Compliance Plan is the formal mechanism used by JFS to prevent, detect and resolve issues of compliance with the letter and spirit of applicable laws and regulations and JFS policies, practices and procedures.

B. JFS employees are required and encouraged to report suspected or known violations. Types of violations that should be reported include, but are not necessarily limited to:

- Environmental laws & regulations
- Health and safety laws & regulations
- Antitrust laws & regulations
- Research laws & regulations
- Copyright laws and software piracy
- Theft, bribes and kickbacks
- Fraudulent transactions
- Conflicts of Interest
- Potential criminal violations
- Fraud, waste and abuse and other wrongdoing

- Violations of any JFS business practices

C. Key features of the JFS Corporate Compliance Plan are:

1. The designation of the COO/Human Resources Director as the JFS Corporate Compliance Officer (CCO) responsible for directing the effort to elicit and enforce compliance;
2. The reinforcement of the JFS Code of Conduct (see JFS Policy #1-7-1 *Code of Ethics and Conduct: Core Values*), including an educational and retraining plan for dissemination of the code;
 1. Incorporation of standards and policies that guide JFS personnel and other third parties affiliated with JFS in regards to practice in high-risk compliance areas such as financial assistance to clients, purchasing and contracting;
 2. A coordinated education and training program for JFS personnel and other third parties affiliated with JFS in regards to practice in high-risk compliance areas;
 3. A publicized and uniform mechanism for JFS personnel and other third parties affiliated with JFS to raise questions and receive appropriate guidance concerning practice in high-risk compliance areas;
 4. A publicized and accessible process for JFS employees and others to report possible compliance issues (see JFS Policies #1-4-4 *Complaint and Resolution Process*, #1-6-3 *Incident Reporting* and #1-7-4 *Employee Discipline, Grievance and Appeal*),
 5. A procedure for investigating and resolving reports of possible compliance issues;

C. Formulation of corrective action plans to address any compliance problems that are identified; Monitoring of policies, procedures, and compliance with laws to ensure the effectiveness of corrective action plans; A plan to monitor JFS' overall compliance efforts and effectiveness.

D. Good faith reporting of possible compliance issues will not subject the reporter to retaliation or harassment as a result of their report. Concerns about possible retaliation or harassment should be reported to the CCO. To the extent possible to pursue an investigation, attempts will be made to make communications anonymous and confidential. It is the intent that no employee shall experience retribution as a result of reporting.

E. Responding to Subpoenas, Search Warrants, Official Investigations and Other Legal Actions -It is the policy of JFS to fully cooperate with the proper lawful inquiries or actions of legally empowered authorities in matters pertaining to JFS affairs, services and clients. JFS responses will always be within the boundaries of legal confidentiality and professional privilege that may apply to specific situations. Under no circumstance will JFS staff except subpoenas or search warrants on someone else's behalf. What's more, in pursuance of securing and safeguarding client information, a HIPPA waiver is required prior to releasing any client records.

Whenever circumstances permit all matters pertaining to subpoenas, search warrants, official investigations and other legal actions regarding JFS shall not be accepted by JFS staff and should be immediately referred to the JFS CEO, or COO (or other senior administrator should the CEO or COO be unavailable). In no event will this referral or notification substantially delay or hinder a proper legal action by duly constituted authorities. Staff should not accept subpoenas for other staff members.

F. Statements to the Media - if a JFS staff member or other person affiliated with JFS such as a volunteer or Board Member is contacted by the media for a statement expressing the position of JFS, the contact should be referred to the CEO or Chief Development Officer. In some situations, outside the scope of an employee's professional involvement with JFS, an employee will be asked to express his/her opinion or to take action regarding social issues. If the employee is closely identified with JFS in the community, it may be necessary for the employee to indicate that he or she is expressing his/her own point of view, and not that of JFS.

V. PROCEDURES

A. The JFS Chief Operating Officer serves as the JFS Corporate Compliance Officer. In the event that absence or other circumstances make it either necessary or prudent, the JFS Chief Executive Officer may serve as Corporate Compliance Officer or appoint a designee.

- Current Compliance Officer: Elina Zilberberg, COO
- Current Privacy Officer: Sarah Hong, CPO
- Current Recipient Rights Officer: Caroline Butler, Senior Director of Thrive Services

B. New employee orientation and annual training for all JFS staff will document the review of the JFS Code of Conduct and other relevant policies and procedures related to compliance including but not necessarily limited to:

1. JFS Policies:

- #1-8-2 *Data Evaluation and Use*
- #1-4-4 *Complaint and Resolution Process*
- #1-6-3 *Incident Reporting*
- #1-7-1 *Code of Ethics and Conduct: Core Values*
- #1-7-4 *Employee Discipline, Grievance and Appeal*
- #1-3-5 *Corporate Compliance Plan*
- #1-3-1 *Non-Discrimination/Harassment/Retaliation*
- #1-3-2 *Confidentiality*
- #1-3-3 *Conflict of Interest*
- #1-3-4 *Records Retention*

2. JFS financial and purchasing procedures and required authorizations.

3. Relevant sections of the *JFS Human Resources Handbook*, including the *Whistle-Blower Protection* section citing the *Sarbanes-Oxley Act*. Special emphasis shall be placed on the reporting mechanisms and safeguards in place for reporting suspected instances of staff non-compliance with the letter and spirit of applicable laws and regulations and JFS policies, practices and procedures.

4. Specific emphasis will be placed on the acceptability of all methods of reporting non-compliance or suspected non-compliance, including anonymous reporting.

5. Special emphasis on:

- the requirement for JFS staff to report suspected staff non-compliance or illegal or unethical activities,

- that reports made in good faith result in the reporter being protected under the *Sarbanes-Oxley Act*,
- **and that failure to report suspected non-compliance is, in and of itself, an act of non-compliance.**

C. The JFS Corporate Compliance Officer or designee, will receive, record in the JFS Corporate Compliance Report Log, and direct the investigation of all reports of alleged/suspected non-compliance.

D. The CCO will:

- Investigate within seven (7) days and respond to and resolve a complaint within 30 days of the receipt of the complaint and
- Issue a report that will include findings and, if indicated, corrective action and resolution.
- The CCO will either personally conduct the investigation or delegate the investigation to a more appropriate JFS staff member. The CCO will request assistance in the investigation from the reporter, other personnel or external sources, as appropriate (all aspects of the investigation will remain under the active oversight of the CCO or JFS CEO, as appropriate)
- Ensure that appropriate education and training is provided to employees, as necessary, to minimize the risk of the same compliance violations recurring;
- Follow up the corrective action/resolution to assure compliance;
- Record follow up and assign closing date; and
- Monitor compliance after an appropriate amount of time has elapsed to assure effectiveness of the original corrective action.

E. The JFS Corporate Compliance Officer or designee will also develop a corrective action plan that is submitted to the JFS CEO and that includes, but is not necessarily limited to the entire investigation response, resolution and follow-up as in Standard D. with special emphasis placed on remedial systemic action designed to ensure that the same or similar issues do not recur and recommendations for any relevant changes in the JFS Corporate Compliance Plan or in JFS policies.

Other CCO duties and responsibilities are stated in the Exhibit *Corporate Compliance Officer: Duties and Responsibilities*.

F. At least annually and more often if indicated, the JFS CEO or designee will lead a review of the effectiveness of the JFS Corporate Compliance Plan and report the results, compliance related activity, including all reports of violations/suspected violations, and related investigations, remediation and plan revisions to the JFS Board of Directors.

VI. EXHIBIT

Exhibit A- Corporate Compliance Officer: Duties and Responsibilities.

Exhibit B- Corporate Compliance Handbook

VII. REFERENCES

CARF 2023 Behavioral Health Standards Manual, Standard 1.A. 3.; 1.A.6; 1. A.7. Leadership; 1. E.3. e. Legal Requirements

JFS Policies:

- #1-8-2 Data Evaluation and Use*
- #1-1-1 Organization and Leadership Structure*
- #1-4-4 Complaint and Resolution Process*
- #1-6-3 Incident Reporting*
- #1-7-1 Code of Ethics and Conduct: Core Values*
- #1-7-4 Employee Discipline, Grievance and Appeal*
- #1-3-5 Corporate Compliance Plan*
- #1-3-1 Non-Discrimination/Harassment/Retaliation*
- #1-3-2 Confidentiality*
- #1-3-3 Conflict of Interest*
- #1-3-4 Records Retention*

JFS Human Resources Handbook

Author: JFS Administration
