
River Valley Health & Dental Corporate Compliance Plan

1. Policy

River Valley Health & Dental (“*Health Center*”) is committed to conducting business in compliance with all applicable laws, rules and regulations. *Health Center* has established this Corporate Compliance Plan and related Corporate Compliance policies and procedures (including *Health Center*’s Standards of Conduct) to assist in developing a proactive and effective Corporate Compliance Program.

2. Purpose

Health Center’s Corporate Compliance Plan provides an overview of the components of the Corporate Compliance Program and an overview of applicable compliance related laws, rules, and regulations. It is *Health Center*’s intent to comply with all federal, state, and local laws, rules and regulations, as well as to use general good business practices to protect its reputation and to avoid or prevent non-compliance.

3. Scope

This Corporate Compliance Plan is intended to apply to all of *Health Center*’s activities and to all “individuals affiliated with *Health Center*” which includes Board members, employees, agents, and volunteers. This Corporate Compliance Plan is distributed to all individuals newly affiliated with *Health Center* during orientation and it is distributed annually thereafter.

4. Corporate Compliance Plan

Health Center recognizes the importance of complying with applicable federal, state, and local laws and regulations and developing a proactive and effective Corporate Compliance Program. To support these goals, *Health Center* has developed this Corporate Compliance Plan. *Health Center*’s Corporate Compliance Plan is divided into two main sections:

1. An overview of the components of *Health Center*’s Corporate Compliance Program and
2. An overview of applicable compliance-related laws, rules, and regulations.

Every individual affiliated with *Health Center* is responsible for ensuring that his or her conduct is consistent with the *Health Center*’s Corporate Compliance Program, including this Corporate Compliance Plan, policies, and procedures (including the Standards of Conduct), and generally accepted standards of professionalism, courtesy, and respect. Supervisors and managers are responsible for ensuring that the conduct of those they supervise complies with this Corporate Compliance Plan.

5. Overview of the Components of *Health Center's* Corporate Compliance Program

Health Center's Corporate Compliance Program consists of the following elements:

A. Compliance Program Structure. It is *Health Center's* policy to have a Compliance Officer to oversee the development and implementation of its Corporate Compliance Program and to ensure appropriate handling of instances of suspected or known illegal or unethical conduct. The Compliance Officer's duties include:

- Receiving reports of problems or violations, investigating such reports and coordinating any required corrective action;
- Suggesting policies related to compliance to the Board and developing procedures implementing policies approved by the Board;
- Overseeing periodic compliance audits and regular compliance monitoring by department managers;
- Training individuals affiliated with *Health Center* in compliance matters;
- Reporting incidents of non-compliant conduct to the CEO and Board, as appropriate; and
- Ensuring that appropriate disciplinary actions or sanctions are applied.

Health Center's Compliance Officer reports to the Chief Executive Officer and is assured direct access to *Health Center's* Board for the purpose of making reports and recommendations on compliance matters. The Compliance Officer provides regular reports *at least annually* to the Board. It is acknowledged that the Board may schedule an executive session between the Board and the Compliance Officer (excluding senior managers) if in their discretion such a session would be advisable. The Board Chair may request more frequent reports from the Compliance Officer, as necessary.

The Compliance Officer reports quarterly to the Senior Management Committee to review the progress and scope of the Annual Work Plan of the Compliance Program, which includes the schedule of monitoring and planned audit activities deemed appropriate by the ongoing risk analysis that is performed.

B. Written Standards of Conduct and Policies and Procedures for Promoting Compliance. *Health Center* has established compliance standards, policies, and procedures to assist individuals affiliated with *Health Center* in recognizing compliance issues and to guide them to do the right thing. These include organizational policies and procedures that direct the operations of *Health Center's* Compliance function, including the Standards of Conduct, and this Corporate Compliance Plan document. Copies of these items are available through *Health Center's* intranet or by requesting a copy from the Compliance Officer.

Health Center develops and/or revises and implements policies and procedures consistent with the requirements and standards established by the Board; federal, state and local laws, rules and regulations; relevant reviewing and accrediting organizations (such as the
