

A Center for Function and Creativity



Our Commitment to Compliance

Our Compliance Policy

We manage our company in accordance with all legal and regulatory requirements, CARF standards, and highest principles of business, professional and personal ethics.

We adhere strictly to a Code of Ethics and Standards of Conduct relevant to our business — and we require our employees, officers, directors, contractors, volunteers and partners to do the same.

We exhibit integrity, honesty and fairness in all business dealings with our stakeholders — including clients, guardians, employees, independent contractors, case managers, community coordinators, therapists, employment consultants, regulatory agencies, suppliers and vendors — and with our competitors.

We are committed to ensuring the wellbeing, safety, independence and privacy of our program participants — and we treat each and every individual with dignity and respect.

We observe proper record maintenance, retention and disposal requirements in compliance with all laws, administrative regulations and company policies pertaining to the confidentiality, privacy and security of information. All employees and business associates must sign a Confidentiality and Non-Disclosure Agreement.

We foster a fair and respectful work environment — all employees are expected to behave in a professional, supportive, fair and respectful manner toward one another. Discrimination or harassment of any kind is not tolerated!

We implement and enforce written compliance policies and procedures which are overseen by our Corporate Compliance Committee.

We delegate authority to our Chief Compliance Officer to monitor compliance efforts, enforce compliance practice standards, and to provide guidance to employees, officers and directors to prevent violations of law or company policies and to ensure legally compliant business conduct.

Our Compliance Policy/Page 2

We provide our employees with effective training and education on compliance policies, procedures and standards of conduct. All employees are required to report any compliance violations to the Chief Compliance Officer.

We maintain direct channels of communication between personnel and Chief Compliance Officer, as well as Executive Leadership, to facilitate anonymous reporting mechanisms.

We conduct internal monitoring and auditing by performing self-audits.

We enforce compliance through disciplinary guidelines, which are communicated to and acknowledged in writing by each employee.

We respond promptly to all detected offenses, evaluating and/or initiating investigative procedures, and developing corrective action plans.

We keep corporate and personal interests separate — employees, officers, directors and contractors must keep their personal interests separate from those of the company.

We cooperate with government authorities, accrediting agencies and other relevant authorities — all information communicated must be accurate and provided in a timely and understandable manner that complies with applicable laws, regulations, standards.

All CFC employees, officers, directors, contractors, agents and volunteers are required to perform their duties in accordance with all applicable laws, regulations, rules, CARF accreditation standards, and company policies, procedures and guidelines.

Robert D. Hobbs
Corporate Director/President

Daniel A. Cordova
Corporate Director/Chief Operating Officer

Anita Pohl-Schissel
Chief Executive Officer

Our Compliance Program

Code of Ethics provides the foundation of our Compliance Program and sets standards of conduct that we follow in all of our business practices, our service delivery, and our human resources. We enforce a strict policy of Zero Tolerance for Corruption.

Chief Compliance Officer operates as an independent and objective entity in overseeing our Compliance Program, working closely with CFC leadership, management, supervisors, staff, and stakeholders.

Effective Channels of Communication for reporting violations and for raising compliance concerns include our Open Door Policy and direct access to the Chief Compliance Officer.

Non-Retaliation Policy and “Good Faith” Reporting protects employees from any retaliatory action against them for “good faith” reporting of compliance concerns or violations.

Compliance Detection/Response Mechanisms

- Regulator Monitoring
- Random Audits
- Prompt, Thorough & Objective Internal Investigations
- Confidentiality (to extent permitted and/or required by law)
- Appropriate and Timely Corrective Action
- Reporting to Duly Authorized Agencies (as required and appropriate)
- Responding to Official Government Investigations (as legally required)

Our Standards of Conduct

Business Practices

- Accurate, Timely & Complete Documentation
- Accurate, Timely & Complete Billing and Coding
- Ethical Contractual Relations
- Confidentiality and Security of Information
- Record Maintenance, Retention, Destruction
- Respecting Intellectual Property Rights
- Acceptable Use of Electronic & Social Media
- Media and Public Relations
- Protecting Company Resources

Service Delivery

- Maintaining Effective Stakeholder Relations
- Continuous Quality Improvement
- Ensuring Health and Safety
- Protecting Human Rights
- Mandatory Reporting of Abuse
- Respecting Boundaries
- Safeguarding Client Funds and Property

Human Resources

- Equal Opportunity and Diversity
- Non-Discrimination and Non-Harassment
- Accountability & Responsibility
- Professional Conduct