

## **THE COUNSELING SOURCE, INC. POLICY AND PROCEDURE**

TITLE: Corporate Compliance

PURPOSE: The goal of the Corporate Compliance Program is to ensure a Company culture that is ethical in all respects and one that refuses to tolerate non-compliance, in any respect, with the Standard of Conduct.

POLICY: The Counseling Source, Inc. will have a written document to educate employees on the Company's Standard of Conduct that gives the employees the information and process to prevent, detect and report conduct that is not consistent with the Standard of Conduct. The employee and the management staff, through a joint process can then resolve the issues that are inconsistent with the Standard of Conduct through an organized and consistent process.

The document will include, but not be limited to the following Ethical Standards:

- Equal Employment Opportunity
- Statement on Harassment
- Conflict of Interest
- Fraud and Deception
- Proprietary Information
- Competition and Solicitation
- Accepting Gifts or Gratuities
- Substance Abuse
- Statement on Workplace Violence
- Rules and Regulations
- Disciplinary Procedure
- Complaints and Disputes Procedure

The plan will include, but not be limited to the following Legal Standards:

- Operating Policies and Procedures
- Medical necessity
- Billing for Services Rendered
- False Claims
- Anti-kickbacks
- Cost Reports
- Billing Codes
- Bundling of Services
- Licensing
- Covered Services
- Carriers
- Retention of Records

PROCEDURE:

Staff training for the Corporate Compliance Program will be conducted in the new employee orientation and on an annual basis.

REFERENCED STANDARDS AND REGULATIONS:

CARF Behavioral Health Standards Manual

EFFECTIVE DATE: 5/7/2006

REVIEWED: February 2018

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David F. Turner, Ph.D. Executive Director

Date