

## CORPORATE COMPLIANCE COMMITTEE CHARTER

Page 1 of 2

### Statement of Purpose:

Daleview Care Center is committed to:

- Fostering a culture of integrity, accountability, and ethical behavior;
- Implementing processes that prevent, detect, and correct conduct or practices that are illegal or unethical;
- Establishing an environment that encourages all affected individuals to report ethical concerns without fear of retaliation;
- Identifying and addressing the facility's primary compliance risks;
- Establishing internal controls that promote adherence to laws and regulations; and
- Maintaining ethical and transparent business practices.

### Roles and Responsibilities:

The Corporate Compliance Committee's responsibilities include:

- In support of the governing body and the CCO, oversight and evaluation of the structure, operations, and effectiveness of the Corporate Compliance Program;
- Staying abreast of significant developments relating to the compliance expectations from federal and state legislators, regulators, and/or enforcement officials;
- Coordinating appropriate accountability for compliance with the fundamental federal and state legal and regulatory requirements that apply to all facets of DCC's mission and work;
- Assisting the CCO in ensuring the Code of Conduct and compliance-related policies and procedures are complete, periodically revised as necessary, and consistently enforced;
- Ensuring that annual compliance training is developed and conducted, and overseeing an annual compliance training plan addressing key compliance risks;
- Reviewing and approving annually the compliance risk assessment and associated work plan, which includes compliance auditing and monitoring initiatives;
- Reviewing periodically the findings of compliance auditing and monitoring initiatives and ensuring management develops and timely implements appropriate corrective actions in response to findings;
- Ensuring that the Compliance Program has effective open communication channels, including a method for all affected individuals – including residents and visitors – to report, in good faith and anonymously, if they wish, all compliance and ethical concerns;
- Assisting the CCO in fulfilling compliance reporting obligations to the governing body by timely informing the CCO of any known audits, reviews, and/or investigations by government agencies; potential overpayments to federal or state healthcare programs and employment or engagement of an individual or entity that is currently, or is likely to be, excluded, debated, suspended or otherwise declared ineligible to participate in federal or state healthcare program or procurement or non-procurement programs;

- Periodically, and no less than annually, assessing the Corporate Compliance Committee's oversight of the Compliance Program as evidenced by operating in conformance with all Charter requirements, and reporting to the governing body;
- Periodically reviewing and revising, as appropriate, the Charter.

**Members:**

To ensure the CCC has the insight, perspective, and full support of the key organizational functions and the departments of Daleview, its membership will include the following:

- Corporate Compliance Officer
- Director of Nursing Services
- Assistant Directors of Nursing
- Inservice Coordinator (talent acquisition)
- Comptroller
- Director of Social Work
- Maintenance Director
- Food Service Director
- Housekeeping Director
- Rehab Director
- MDS Coordinator
- Recreation Director

The CCO may invite to attend CCC meetings other department heads, employees and/or outside advisors or counsel. Any requests for additional attendees must be approved in advance by the CCO.

The CCO will recommend to the governing body additions and changes to the composition of the committee, which may change at times due to vacant or otherwise unfilled positions. Immediately upon termination of employment with Daleview Care Center, a member will cease serving on the Corporate Compliance Committee.

**Leadership:**

The CCO will serve as the chairperson of the CCC. The CCO may appoint a delegate to chair the meeting at their sole discretion.

**Reports to:**

The governing body and the CCO have the ultimate authority as to the composition of the committee.

**Meetings:**

The CCC shall meet at no less than quarterly intervals; more frequently as needed.

CCC members may participate in meetings in person, telephonically, or through video conferencing.

**Meeting Minutes:**

Minutes of all meetings will be maintained at the direction of the chair. Draft minutes will be distributed to CCC members to review and suggest edits as necessary. Minutes will be sent to the governing body quarterly.

March 28, 2023, CD