



# 2025 Corporate Compliance Plan and Code of Conduct

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**The Center for Growth and Independence  
(The Center)**

1440 East Empire Avenue

Benton Harbor, MI 49022

[www.TheCentergi.org](http://www.TheCentergi.org)



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## **The Center Mission:**

**Focusing on people's abilities to enhance their quality of life.**

## **The Center Vision:**

**Inclusion and independence for everyone, every day, everywhere.**

The Board of Directors, employees, clients, and volunteers of The Center recognize the need to make efficient and effective use of resources provided by the community and the local, state, and federal governments to account for such support as appropriate and to exemplify sound, fair and ethical business practices in its daily operations.

This Compliance Plan and Code of Conduct shall represent the principles The Center agrees to adhere in carrying out its mission, guiding Board members, employees, clients, and volunteers in their services and business operations.

Each new employee and Board member will be required to review and sign this compliance plan and code of conduct statement, indicating knowledge and acceptance of it. Any employee who violates one of the agency's codes of conduct may face corrective action including and up to termination. Board action may be taken with any Board member who violates the plan or code of conduct. For management to be aware of any real or potential conflicts of interest in conducting business, conflict of interest statements will be completed by Board members, middle and upper management employees on an annual basis.

## **Core Values:**

The Core Values that serve as roots for our Code of Conduct are:

1. **L**eadership: the art of motivating a group of people to act toward achieving a common goal.
2. **O**pportunity: A set of circumstances that make it possible to do something.
3. **T**eamwork: Communicating and working together to achieve the mission.
4. **U**nique: Being the only one of its kind; unlike anything else.
5. **S**uccess: The accomplishment of an aim or purpose.

## **S.T.A.R. Standards:**

The Center employees and board members must adhere to the S.T.A.R. Standards (**S**ervice, **T**eamwork, **A**ttitude, and **R**eliability)

## **Overview:**

This Corporate Compliance Plan documents The Center's approach to assuring that federal and state regulatory and contractual obligations related to compliance of the Prepaid Inpatient Health Plan (PIHP) are fulfilled. The Center Corporate Compliance Plan addresses regulatory compliance obligations as a provider and how it has



obligations to the services provided to the client. The Corporate Compliance Program is designed to further The Center's commitment to comply with applicable laws, promote quality performance throughout Michigan, and maintain a working environment for all personnel that promotes honesty, integrity and high ethical standards. The Center's Corporate Compliance Program is an integral part of its mission, and all personnel are expected to support the Corporate Compliance Program.

The Compliance Plan comprises the following principal elements:

1. The development and distribution of written standards of conduct, as well as written policies and procedures, that promote The Center's commitment to compliance and that address specific areas of potential fraud.
2. The identification of a Corporate Compliance Officer and other committee members charged with the responsibility and authority of operating and monitoring the compliance program
3. The development and implementation of regular, effective training programs for all employees.
4. The development of effective lines of communication between the Corporate Compliance Officer and all employees, including a hotline to receive complaints and the adoption of procedures to protect the anonymity of complainants and to protect callers from retaliation.
5. The use of audits or other risk evaluation techniques to monitor compliance and assist in the reduction of identified problem areas within delivered services, claims processing and managed care functions.
6. The development of disciplinary mechanisms to consistently enforce standards and the development of policies addressing dealings with sanctioned and other specified individuals.
7. The development of procedures to respond to identified wrongdoings, to initiate corrective action, to prevent similar offenses, and to report to authorities when appropriate.

The Center's Corporate Compliance Program is committed to the following:

1. Minimizing organizational risk and improving compliance with the service provision, documentation, and billing requirements.
2. Maintaining adequate internal controls throughout the organization
3. Encouraging the highest level of ethical and legal behavior from all employees and Board members.
4. Educating employees, board members, and stakeholders on their responsibilities and obligations to comply with applicable local, state, and federal laws
5. Providing oversight and monitoring functions

## **Section 1- Code of Conduct: Employees and Board of Directors**

To safeguard the ethical and legal standards of conduct, The Center will enforce policies and procedures that address behaviors and activities within the work setting, including but not limited to the following:

1. Services:
  - a. Services will be provided according to the client's person-centered plan.
  - b. The client's dignity and respect will always be protected.
  - c. Promote self-determination and independence.



- d. Maintain a safe, trusting, and respectful environment.
  - e. Maintain professional boundaries.
2. Confidentiality: The Center is committed to protecting the privacy of its clients. Board members and employees are to comply with the Michigan Mental Health Code, Section 330.1748, 42 CFR Part 2 relative to substance abuse services, and all other privacy laws as specified under the Confidentiality section of this document.
3. Harassment: The Center is committed to an environment free of harassment for Board members and employees. The Center will not tolerate harassment based on sex, race, color, religion, national origin, citizenship, chronological age, sexual orientation, or any other condition, which adversely affects their work environment. The Center has a strict nonretaliation policy prohibiting retaliation against anyone reporting suspected or known compliance violations. See the employee handbook for more information.
4. Conflict of Interest: Board members and employees will avoid any action that conflicts with the interest of the organization. All Board members and employees must disclose any potential conflict of interest situations that may arise or exist.
5. Culture:
  - a. Board members and leadership will establish cultures that promote prevention, detection, and resolution of instances of misconduct to conform to applicable laws and regulations.
  - b. Board members and employees will support and respect each other.
  - c. Board members and employees will interact with everyone in a friendly, positive, enthusiastic, and courteous way.
6. Excluded Individuals: The Center will perform criminal records checks, including motor vehicle reports on potential employees prior to hire and annually thereafter.
7. Training: Employees are expected to participate in industry training throughout the year, including but not limited to compliance, confidentiality, culture competency, and recipient rights. Employees are encouraged to increase personal and professional development.
8. Reporting: All Board members and employees have the responsibility of ensuring the effectiveness of the organization's Compliance Program efforts by actively participating in reporting of suspected violations of the Compliance Plan or policies, and the standards stated in this Code of Conduct.
9. Gifts From Clients: Board members and employees are prohibited from soliciting tips, personal gratuities or gifts from clients or families. Additionally, employees are prohibited from accepting gifts or gratuities of more than nominal value. The Center defines "nominal" value as \$25.00 per gift or less.
10. Marketing:
  - a. Marketing and advertising practices are defined as those activities used to educate the public, provide information to the community, increase awareness of services, and recruit employees.
  - b. Marketing initiatives should always respect the dignity and privacy of those served and will uphold the integrity of The Center.
  - c. The Center will never knowingly mislead or misinform the public.
11. Financial Reporting: The Center shall ensure integrity of all financial transactions. Transactions shall be executed in accordance with established policies and procedures and with federal and state law and shall be recorded in conformity with generally accepted accounting principles. Records will be audited annually by a certified public accountant.



12. **Honesty:** The Center is committed to truthful billing that is supported by complete and accurate documentation. Employees may not misrepresent a client, or the services provided. The Center will not tolerate any false statements. Deliberate misstatements will expose the individual to potential criminal penalties and termination.
13. **Responding to Investigations:** The Center will fully comply with the law and cooperate with any reasonable demand made in an investigation. Employees may not aid in any attempt to provide inaccurate or misleading information or obstruct, mislead, or delay the communication of information or records relating to a possible violation of the law. It is crucial that the legal rights of the company and its employees are protected. If any board member employee receives an inquiry, a subpoena, or other legal documents requiring information about The Center or operations, whether at home or in the workplace, from any agency, The Center requests that the person notify the Executive Director or the Corporate Compliance Officer immediately.

The Center will distribute the Code of Conduct to all employees upon hire, annually or if any updates were made. The employee shall certify in writing that they have received, read, and will follow the organization's Code of Conduct.

In addition to the Code of Conduct, all employees will be familiar with and agree to follow all business operations, safety, and services policies and procedures as well as the employee handbook.

All Business operations, safety, and services policies and procedures and the employee handbook are available to all employees through the employees personal Paychex account.

It is the policy of The Center to ensure that all services are structured in accordance with federal and state laws and regulations and are in the best interest of the organization and the clients we serve. To ethically and legally meet all standards, The Center does not receive or provide any incentive for referrals. Client referrals and intakes will be accepted based on the client's need and The Center's ability to provide the services needed.

## **SECTION 2 – Corporate Compliance Committee:**

The Corporate Compliance Committee shall be chaired by a Board member and the committee should be made up of both Board members and employees. The Executive Director will designate a Corporate Compliance Officer (CCO), an employee, who will be given sufficient authority to oversee and monitor the Compliance Plan, including but not limited to the following:

1. Recommending revisions/updates to the Compliance Plan, policies, and procedures to reflect organizational, regulatory, contractual and statutory changes.
2. Reporting on a regular basis the status of the implementation of the Compliance Plan and related compliance activities.
3. Facilitating and coordinating compliance training.
4. Assuring continuing analysis, technical expertise and knowledge transmission of corporate compliance requirements
5. Coordinating internal audits and monitoring activities outlined in the compliance work plan.
6. Performing or causing to be performed risk assessments, verification audits, and on-site monitoring



7. Ensure coordinating efforts with Human Resources, or other relevant departments regarding employee training, background checks, and other necessary documents.
8. Developing and modifying policy and programs that encourage the reporting of suspected fraud and other potential problems without fear of retaliation.
9. Independently investigating and acting on matters related to compliance.
10. Drafting and maintaining reports including annual Compliance Program Evaluation and quarterly Board compliance reports.

The Center maintains a Corporate Compliance Committee that oversees the implementation and operation of the Compliance Plan. The Corporate Compliance Committee reviews reports and recommendations regarding compliance activities. This includes data regarding compliance generated through audits, monitoring, and individual reporting. Based on these reports, the Corporate Compliance Officer will make recommendations to the Committee regarding the efficiency of the Compliance Plan.

Specific responsibilities of the Corporate Compliance Committee include:

1. Regularly reviewing compliance program policies to ensure they adequately address legal requirements and address identified risk areas.
2. Analyzing the effectiveness of compliance training
3. Reviewing the compliance log for adequate and timely resolution of issues and/or inquiries.
4. Assisting the CCO in identifying potential risk areas, advising and assisting the CCO with compliance initiatives, identifying areas of potential violations, and recommending periodic monitoring/audit programs.
5. Assisting in the development of policies to address the remediation of identified problems.
6. Receiving, interpreting, and acting upon reports and recommendations from the CCO.
7. Evaluating the overall performance of the Compliance Program and making recommendations accordingly.
8. Providing a forum for the discussion of ethical issues related to entity business functions.

### **SECTION 3 – Compliance Training:**

Proper and continuous training at all levels is a significant element of an effective compliance program. Therefore, training is provided upon hire for new employees, annual, and periodic retraining is provided for existing employees. Policies and procedures will be reviewed with employees at hire, annually, and when any updates are made.

Board members and employees will be scheduled to receive The Center’s compliance program and Code of Conduct at orientation or within thirty (30) days of employment (or volunteering) and annually thereafter.

Records will be maintained on all formal training and educational activities. Training is considered a condition of employment and failure to participate in the training will result in termination.



A copy of the Plan will be kept on file by the CCO and maintained at The Center's office. The Corporate Compliance Plan can also be accessed on the employees personal Paychex account and on The Center's Website at [www.thecentergi.org](http://www.thecentergi.org).

#### **SECTION 4 – Compliance Reporting and Ongoing Communication:**

All Board members and employees must be familiar with applicable federal and state laws and regulations as well as The Center policies and procedures. Any Board member or employee that know, or has reason to believe, that an employee of, or independent professional providing services to, The Center is not acting in compliance with federal and state laws and regulations should report such matters to the CCO consistent with the applicable compliance policy.

Reporting of suspected violations may be accomplished through a verbal, written, or anonymous report using the following mechanisms:

1. The Center's Telephone Hot Line: 269-252-4403 and includes confidential voice mail.
2. Electronic Mail (E-Mail) – [HR@thecentergi.org](mailto:HR@thecentergi.org) Or The Center's website [www.thecentergi.org](http://www.thecentergi.org)
3. Mail Delivery –The Center for Growth and Independence Attn: Corporate Compliance Officer 1440 E. Empire Avenue Benton Harbor, MI 49022.
4. In Person - Suspected compliance violations or questions can be made in person to The Center's CCO at the above address.

Whistleblower Protections for The Center Employees who make good faith reports of violations of federal, or state law are protected by state and federal whistleblower statutes. Under the Federal False Claims Act and the Michigan Medicaid False Claims Act, employees who report violations in good faith are entitled to protection from disciplinary actions taken by their employer. The Center will not threaten or retaliate against anyone for reporting violations or potential violations. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

#### **Investigating Violations:**

Any violation or accusation of a violation will be investigated by the COO and/or Compliance Committee. The investigation will commence within fifteen days of the accusation being made and conducted in a timely fashion. Based on the outcome of the investigation, if an individual is found to have violated The Center code of conduct, disciplinary action will be taken, for employees, up to and including termination. For Board members, up to and including removal from the board. Any conduct that violates state or federal laws will be turned over to the appropriate legal authorities.

#### **SECTION 5 - Compliance Auditing and Monitoring:**

Southwest Michigan Behavioral Health and the Community Mental Health Authorities are responsible for monitoring compliance activities and operations within The Center.

Upon audit completion, the CCO must report any determinations of noncompliance to the Executive Director, and the Corporate Compliance Committee. Together, they will determine a plan of correction including a timeline to become compliant.



The Center also performs internal monitoring activities. The CCO will identify, interpret and determine standards of compliance through internal monitoring functions. The CCO shall prepare a quarterly monitoring checklist to review with the Corporate Compliance Committee. The Committee shall follow the Records Review Procedures to audit compliance and utilize the following to monitor compliance:

1. Employee and Client Surveys obtained annually.
2. Information gained from written reports from SWMBH compliance staff.
3. Utilizing audit and assessment tools developed to track all areas of compliance
4. Audits designed and performed by internal and/or external auditors utilizing specific compliance guidelines
5. Investigations of alleged noncompliance reports
6. Exit interviews with departing employees.
7. The CCO is also responsible for ensuring a risk assessment is performed annually with the results integrated into the daily operations of the organization.

## **SECTION 6 – Confidentiality and Privacy**

The Center is committed to protecting the privacy of its clients and shall strictly govern the disclosure of any information to anyone other than those authorized in the current published Privacy Notice. Any Board member or employee who engages in unauthorized disclosure of client information is subject to disciplinary action which may result in removal from the Board or termination of employment. To ensure that all client information remains confidential, Board members and employees are required to comply with all confidentiality policies and procedures in effect, specifically to include the HIPAA privacy regulations outlined below:

1. Notice of Privacy Practices – The Center will give a Notice of Privacy Practices to each client at intake and to be further available upon request. The Notice of Privacy Practices are also located at [www.thecentergi.org](http://www.thecentergi.org)
2. Consent - Prior to services The Center will obtain a signed client consent for permission to provide services according to their person-centered plan.
3. Release of Information - If client Protected Health Information is disclosed to an individual or entity outside of The Center, a signed release of information (ROI) will be obtained from the client.



## 2025 Corporate Compliance Plan and Code of Conduct Acknowledgment Form

I have received a copy of the 2025 Corporate Compliance Plan and The Center's Code of Conduct.

I have received, read and understand The Center's Compliance Plan, Code of Conduct, and related policies and procedures.

I pledge to act in compliance with and abide by the Code of Conduct and the Compliance Plan during the entire term of my employment.

I acknowledge that I have a duty to report to the Corporate Compliance Officer (CCO) any alleged or suspected violation of the Code of Conduct, agency policy, or applicable laws and regulations.

I will seek advice from my supervisor or the CCO concerning appropriate actions that I may need to take to comply with the Code of Conduct or Compliance Plan.

I understand that failure to comply with this acknowledgement or failure to report any alleged or suspected violation of the Code of Conduct or Compliance Plan may result in disciplinary action up to and including termination of employment.

I agree to participate in any future compliance training courses as required and acknowledge my attendance at such training courses as a condition of my employment.

Employee-Board Member Name: \_\_\_\_\_

Employee-Board Member Signature: \_\_\_\_\_ Date: \_\_\_\_\_

H.R. Representative Signature: \_\_\_\_\_ Date: \_\_\_\_\_

