

Policy Title:	Compliance Policy and Procedure Development and Review (CMP)
Category:	CMP - Compliance
Policy Number:	100-003
Initial Effective Date:	08/01/19
Review Date(s):	06/12/23
Revised Date(s):	01/21/21, 03/13/24
Associated Forms & Policies:	Policy & Procedure Development 400-001 Policy and Procedure Read and Sign Forms 600-027
Regulation Reference (if applicable):	Federal False Claims Act, 31 USC §§ 3729-3733 NYS Law 31 USC § 3730(h)
Key Words:	Procedure, Policy, Compliance

I. Policy

It is the policy of Crouse Medical Practice (“CMP”), to have policies and procedures in place to address issues related to compliance with laws and regulations pertaining to its business practices, including those pertaining to the development, implementation and evaluation of Crouse Medical Practice’s Corporate Compliance Program’s policies and procedures. This policy is subject to the requirements applicable, of CMP’s policies entitled, **Policy & Procedure Development 400-001** and **Policy and Procedure Read and Sign Forms 600-027**.

The Compliance Officer (“CO”), or their designee, with input from the appropriate members of the Corporate Compliance Committee, shall oversee the development and implementation of policies pertaining to the Corporate Compliance Program and/or the Code of Conduct. Corporate Compliance Policies are reviewed annually and in accordance with Practice procedures.

II. Purpose

The purpose of this policy is to establish the mechanism for development, implementation, evaluation and revision as necessary of policies and procedures for matters that pose a risk of noncompliance with laws, regulations and standards of business and ethical practice embodied in CMP’s Code of Conduct and Corporate Compliance Program.

III. Scope

This Policy applies to all Compliance Program Policies and Procedures.

IV. Procedure

In addition to the applicable requirements set forth in the policies entitled, **Policy & Procedure Development #400-001** and **Policy and Procedure Read and Sign Forms 600-027** referenced above, the following applies:

- a) Compliance policies will be reviewed at least annually to determine:
 - If policies, procedures, and standards of conduct have been implemented;
 - Whether affected individuals are following the policies, procedures, and standards of conduct;
 - Whether such policies, procedures, and standards of conduct are effective;

- Whether any updates are required
- b) The Corporate Compliance Committee is authorized to make technical changes to the Corporate Compliance Plan, Code of Conduct, and policies and procedures.
- c) The Compliance Officer will then submit such new/amended policy for review and approval following **Policy & Procedure Development 400-001**.