

SCHREIBER PEDIATRIC REHAB CENTER OF LANCASTER COUNTY
ADMINISTRATIVE POLICIES AND PROCEDURES

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POLICY: Corporate Compliance Program

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I. POLICY

The Schreiber Pediatric Rehab Center maintains a code of ethics that declares the ethical values and standards of professional practice which Board Members, employees and volunteers embrace and which they strive to uphold in their responsibilities. The Schreiber Pediatric Rehab Center is committed to maintaining the highest level of ethical standards in its daily client treatment and business functions.

II. PURPOSE

The Corporate Compliance Program sets out the procedures to implement and enforce the standards of conduct as established in the Code of Ethics and other administrative policies to help the Schreiber Pediatric Rehab Center's staff and volunteers better serve the clients, families, and community by acting in a manner consistent with the Center's ethical expectations.

III. RESPONSIBILITY

- A. The Executive Committee of the Board of Directors will oversee the Compliance Program and the activities of the Corporate Compliance Officer (the HR Coordinator).
- B. The Corporate Compliance Officer will have operational responsibility to oversee compliance with the Code of Ethics Policy and the Compliance Program in accordance with all applicable federal, state or local laws. The Corporate Compliance Officer will report to the Chairperson of the Executive Committee.
- C. Department Managers are responsible for ensuring that their staff members adhere to the Code of Ethics Policy, other policies and all applicable requirements of law and regulations and standards of professional conduct.
- D. Center employees are responsible to comply with the Code of Ethics Policy, with all other Agency policies, and with all applicable laws and regulations, and are required to promptly report any suspected or possible violations of applicable law or regulation, the Code of Ethics policy or other Agency policies.

IV. PROCEDURE FOR REPORTING CONCERNS

- A. If you are aware of a suspected violation of any policy, bring it to the attention of your department manager immediately.
- B. If you do not feel comfortable contacting your department manager, please contact the Center's Corporate Compliance Officer through the confidential reporting line (717) 393-9376, ext. 501, by email: shoffman@schreiberpediatric.org, or via postal mail.
- C. When reporting a concern, be sure to provide enough information to initiate an investigation, including specific names, dates, times, locations and issue-specific facts.
- D. Schreiber Center is committed to maintaining confidentiality of callers to the reporting line. No employee who in good faith reports suspected wrongdoing will be subject to retaliation or discipline for having done so, even if the information incriminates management, supervisors, or other employees, even if the report ultimately is established to be erroneous. However, an employee would be subject to disciplinary action if the investigation reasonably concludes that the report of wrongdoing was knowingly fabricated by the employee or was knowingly distorted or exaggerated to either injure someone else or to protect or benefit the reporting employee.

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V. PROCEDURE FOR MONITORING COMPLIANCE

- A. The Corporate Compliance Officer will meet on a regular basis with the Executive Committee. At these meetings, the Executive Committee will be advised of all reported violations of the Code of Ethics Policy and such other policy violations as may be investigated by the Corporate Compliance Officer, and any disciplinary actions taken in response to such actions.
- B. The Corporate Compliance Officer will meet periodically with the Executive Committee to review the efforts of the agency to prevent violations of the Code of Ethics Policy and make revisions as deemed appropriate to the Compliance Program.
- C. The Corporate Compliance Officer assures that records are maintained confirming that Board Members and employee acknowledge in writing on an annual basis that he or she has reviewed, understands and has fully complied with the Code of Ethics Policy and that each employee upon hire has received the Code of Ethics Policy and acknowledges, in writing, that he or she has reviewed and understands the provisions of the Code of Ethics Policy and will comply with them.
- D. The Corporate Compliance Officer will communicate to all employees the Center's commitment to the Code of Ethics Policy, that no employee will suffer any penalty or retribution for good faith reporting of any suspected misconduct or impropriety, that reports of suspected misconduct or impropriety may be made anonymously to the Corporate Compliance Officer and that the Center would investigate all such reports, and that any agency employee found to have engaged in any misconduct will receive appropriate discipline, up to and including dismissal.
- E. Department Managers, in accordance with their areas of functional responsibility, will assist with training, educating, and disseminating information necessary to apprise employees of their duties and responsibilities under the Code Ethics Policy, including applicable requirements of law. Department Managers will encourage staff to report promptly any violations and treat such reports as confidential to the extent possible. Department Managers will take no action that could be perceived as discouraging or retaliating for reporting any such violations.
- F. The Corporate Compliance Officer, in conjunction with the Executive Committee, will take such actions as are necessary and appropriate to implement and improve the Compliance Program, including utilizing an annual review and survey of employees for changes and additions to the Compliance Program based on, among other factors, best practices.

VI. PROCEDURE FOR INVESTIGATING REPORTS

- A. The Corporate Compliance Officer will promptly review any policy violation reported to determine whether the incident should be investigated and who should investigate the reported violation.
- B. For all matters under investigation, the Corporate Compliance Officer will be advised on at least, a monthly basis as to the status of such investigation. The Corporate Compliance Officer is responsible for insuring that any violation of the Code of Ethics Policy or the Compliance Program is appropriately and consistently handled. From the time a report is received, the Compliance Officer has thirty (30) days to investigate and collect all pertinent data and information to review with the Executive Committee for final disposition.

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- C. The Corporate Compliance Officer will maintain a record of all policy violations reported, including the status and ultimate resolution (including disciplinary action, if appropriate) of each and such matter. These records will be submitted to Executive Committee during its regular review.
- D. The Corporate Compliance Officer may, from time to time, designate or employ on a consultative basis, advisors that have a particular expertise in specific areas of laws, regulations etc.
- E. Schreiber employees are required to cooperate fully in all investigations by the agency of suspected or possible Code of Ethics violations.

VII. DELEGATIONS OF AUTHORITY AND COOPERATION WITH GOVERNMENT INVESTIGATIONS

- A. It is the policy of the agency to delegate substantial discretionary authority only to those individuals whom the Center is confident who will not engage in illegal activities or violate the Code of Ethics Policy, other policies or other applicable laws or regulations.
- B. The Corporate Compliance Officer will review from time to time the Center's procedures involving substantial discretionary authority and recommend any changes in procedure so that only persons of integrity are selected for such positions.
- C. Any person in a position of authority where there is good cause to believe, he or she is not complying with the Code of Ethics Policy, any related policy or applicable law or regulation, shall be reassigned or otherwise dealt with in an appropriate manner.
- D. It is the policy of Agency to cooperate fully with all governmental Investigative authorities.
- E. It is a violation of the Center's Corporate Compliance Program for any employee to knowingly alter, destroy, mutilate, conceal, cover up, falsify, or make a false entry in any record, document, or tangible object with the intent to impede, obstruct, or influence the investigation or proper administration of any matter.

VIII. POLICY VIOLATIONS

Any violation of the standards as set forth in the Center's Code of Ethics Policy and this Compliance Program could result in disciplinary action, up to and including termination of employment and may result in prosecution under the provisions of any applicable federal, state or local law. The Center does not consider conduct in violation of the Code of Ethics Policy and this Compliance Program to be within the course and scope of an employee's employment, or the direct consequence of the discharge of an employee's duties. Accordingly, to the extent permitted by law, the Center reserves the right not to defend any employee charged with and not pay any damages awarded against an employee for, conduct in violation of the Code of Ethics Policy and this Compliance Program.

- IX. DATE APPROVED: March 17, 2008
- X. Date Reviewed/Revised: 7/2011, 9/2012

President