

	SECTION: Compliance	NO: CMP 001
	TITLE: Summit Compliance Program	DISTRIBUTION: Corporate and all Facilities
Original Date of Issue: 08/01/14		Date of Approval:
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Scope:

All Team Members of Summit Behavioral Healthcare, LLC (Summit BHC), including facilities and their employees, independent contractors and professional staff, Summit Board of Managers (Summit BHC Board), and other individuals authorized to act on behalf of Summit BHC.

Purpose:

To provide Team Members with guidelines regarding the Summit BHS Corporate Compliance Program (Compliance Program) and the Code of Conduct (the Code).

Policy:

The mission of Summit BHC is to improve the lives we touch. We aim to achieve this mission by delivering quality and innovative behavioral healthcare services, including mental health and addiction disorder services in a caring and supportive environment. In fulfilling our mission, Summit BHC is dedicated to adhering to the highest ethical standards and in doing so, will fully comply with all applicable local, state or federal laws and regulations, rules, and business ethics. As such, the Summit BHC Board and global and local management have approved and adopted this Compliance Program.

The Compliance Program has been implemented as part of the routine operations of Summit BHC facilities, subsidiaries and affiliates and is designed to formulate and monitor effective internal controls to assure compliance by all Summit BHC facilities and personnel with local, state or federal laws and regulations, including the Seven Elements of an effective compliance program, through this Compliance Program and the Code. In addition, the Compliance Program will:

- Review the organization’s business activities and consequent legal risks.
- Establish integrity standards through the Code and written policies and procedures.
- Educate all Team Members and relevant personnel to the Code, Compliance Program and requirements.
- Train Team Members and relevant personnel to conduct their job activities in compliance with local, state or federal laws and regulations and according to the policies and procedures of the Compliance Program and the Code.
- Implement auditing, monitoring and reporting functions to measure the effectiveness of the Compliance Program and to address and remediate identified problems or issues.

- Ensure consistent enforcement and disciplinary actions to assure that all Team Members and relevant personnel take their compliance responsibilities seriously and adhere to all compliance requirements.
- Conduct ongoing auditing and monitoring of Summit BHC’s risk areas.
- Identify, investigate, and respond to potential compliance problems.
- Perform routine sanctions checks to ensure Summit BHC does not conduct business with ineligible individuals or entities.
- Maintain an organizational structure that reinforces a culture of compliance, including appointment of a Compliance Committee and a Chief Compliance Officer with an independent reporting relationship to the Summit BHC Board.

Procedure

Overall responsibility for oversight of the Compliance Program belongs to the Summit BHC Board; however, the day-to-day responsibility for operation and oversight of the Compliance Program rests with the Chief Compliance Officer, who will report to the Summit BHC Board directly on the status of the Compliance Program. Additionally, each facility will designate a Local Compliance Officer to oversee and implement the Compliance Program and the Code and the facility’s compliance with applicable local, state or federal laws and regulations, Summit BHC’s policies and the Code. The Local Compliance Officers will report to the Chief Compliance Officer. Procedures to maintain compliance include:

- Applicants for employment, independent contractors, and agency staff are required to disclose whether they have been convicted of a crime, including healthcare related crimes, or have been excluded from or sanctioned by any state or federal program.
- Summit BHC will conduct a background check of all prospective Team Members to ensure they have no history of engaging in illegal or unethical behavior.
- No prospective Team Member will be employed by or occupy a position with Summit BHC if they are known to have engaged in illegal or unethical behavior.
- Summit BHC will screen all prospective Team Members to determine whether they are an “Ineligible Person,” as discussed in the Exclusions Screening Policy. The term “Ineligible Person” means any individual or entity who: (i) is currently excluded, suspended, debarred, precluded, terminated for cause, or otherwise ineligible to participate in federal or state-funded healthcare programs, or in federal or state procurement or non-procurement programs; or (ii) has been convicted of a criminal offense that falls within the ambit of 42 U.S.C. § 1320a-7(a) or 42 U.S.C. § 1320a-7(b)(1)–(3), but has not yet been excluded, debarred, suspended, or otherwise declared ineligible.
- No prospective Team Member will be employed by or occupy a position with Summit BHC if they are found to be an Ineligible Person.
- No persons shall have authority to act contrary to any provision of the Compliance Program or to condone or allow any violation by others. Any person who violates any provision of the Compliance Program, including duty to report, will be subject to disciplinary measures as discussed in the Disciplinary Standards Policy.

- Summit BHC will take steps to thoroughly investigate all reported violations or perceived violations of the Compliance Program in a timely manner.

Procedures for Reporting Violations or Suspected Violations

Summit BHC expects all Team Members to report any violations, suspected violations, or questionable conduct through the following methods:

- Self-reporting is encouraged. Anyone who self-reports their own wrongdoing or violation of the Compliance Program or the Code will be given due consideration in potential mitigation of any disciplinary action that may be taken.
- Communicate verbally or in writing to the Local Compliance Officer or other designated individual at the facility.
- Report online at summitbhc.ethicspoint.com.
- Report by phone at (844) 920-1197.
- Write to Summit BHC, Attention: Chief Compliance Officer, 389 Nichol Mill Lane, Suite 100, Franklin, TN 37067.
- Communicate verbally or in writing to the Summit BHC Chief Compliance Officer.

Retaliation against Team Members who report violations, suspected violations, or questionable conduct in good faith is prohibited. The identity of the reporting Team Member will be kept confidential to the extent possible. Team Members may also report a concern or inappropriate behavior anonymously.

Investigation of Violations

All reported violations, suspected violations, or questionable conduct will be investigated in a timely manner. All Team Members are required to cooperate in the investigation. Failure to do so may result in disciplinary action.

Discipline for Violations

Disciplinary actions may be taken against an individual or individuals if the investigation concludes misconduct. Misconduct includes violations of the Compliance Program and the Code, facility policies and procedures, local, state or federal laws and regulations, failure to report suspected violations, purposefully overlooking violations, or retaliation against any Team Member who reports actual or suspected violations in good faith. Disciplinary actions may include termination of employment. Principles of fairness will apply to disciplinary actions including the availability of hearings and other appeal procedures per Summit BHC policy.

Communication of Changes or Modifications to Compliance Program

Summit BHC will communicate changes or modifications to the Compliance Program concurrently or prior to the implementation of any changes or modifications. Summit BHC reserves the right to

change, modify, or amend the Compliance Program, the Code, or Summit BHC policies as deemed necessary without prior notice.