



Advocates Compliance Committee Charter

Chair	Associate Executive Director	Effective Date: 3/28/23 Revised: 3/18/2024 Review Date: 3/31/2025 Revised Date: 3/12/2026
Sponsor	Executive Director: Amy Dugliss Approval Date: 3/26/2024	
Purpose	<ol style="list-style-type: none"> 1. To assist and coordinate with the Compliance Officer to ensure that Advocates is conducting its business in a legal, ethical, and responsible manner, consistent with its Compliance Program. 2. The Compliance Committee shall have the authority to undertake the specific duties and responsibilities described below and the authority to undertake such other duties as directed by the Executive Director and/or President of the Board. 	
Meetings and Procedures	<ol style="list-style-type: none"> 1. The Compliance Committee shall meet on a regular basis, not less frequently than quarterly. 2. The Compliance Subcommittees shall meet on a regular basis: <ol style="list-style-type: none"> A. The Compliance, Quality, Leadership Team Subcommittee will meet at least monthly. B. The Compliance, Quality, Service Departments Subcommittee will meet every other month. 3. The Compliance Committee shall meet with Advocates' Management and staff at the discretion of the Compliance Officer. 4. The Compliance Committee shall maintain written minutes or other records of its meetings and activities. Minutes of each meeting of the Compliance Committee shall be distributed to each member of the Committee and filed electronically. Minutes and other records of Committee activity will be maintained by the Compliance Officer. 5. The Compliance Officer under the direction of the Chair of the Compliance Committee shall report to the Executive Director and Board following meetings of the Compliance Committee, and as otherwise requested by the President of the Board. 	
Membership	<p><i>The Compliance Committee:</i></p> <p>Chairperson: Associate Executive Director</p> <p>Committee members: Board of Directors' Representative (s) Executive Director Compliance Officer-Director of Compliance, Quality and Incident Management</p>	



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	<p>Director of Human Resources Chief Financial Officer Members of Senior Leadership as deemed appropriate by the Committee Chair</p> <p><i>The Compliance, Quality, Executive Leadership Team Subcommittee:</i> Convened by: Executive Director</p> <p>Subcommittee members: Associate Executive Director Compliance Officer-Director of Compliance, Quality and Incident Management Director of Human Resources Chief Financial Officer</p> <p><i>The Compliance, Quality, Service Departments Subcommittee:</i> Convened by: Compliance Officer-Director of Compliance, Quality and Incident Management</p> <p>Subcommittee members: Executive Director Associate Executive Director HR Director Associate Director of Compliance, Quality and Incident Management Compliance, Quality and Incident Management Team Associates Director of Agency Broker Services Agency Broker Supervisors Director of Community Services Associate Director of Community Services Community Services Intake Admin Director of Independent Broker Services Director of Fiscal Intermediary Services Fiscal Intermediary Supervisors Director of Fiscal Intermediary Intake Director of Training and Support Specialists Training and Support Specialists Supervisors Self-Direction Coordinator Supervisor</p>
Responsibilities	<p>1. The Compliance Committee works with the Compliance Officer to ensure that Advocates has, and maintains, an effective Compliance Program. The Compliance Committee is responsible for the following:</p> <ul style="list-style-type: none"> • Analyzing the regulatory environment where Advocates does business, including legal requirements with which it must comply. • Reviewing and approving new and revised policies and procedures for implementation. • Informing the Board of Directors of new and revised policies and procedures.



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- Reviewing and assessing existing policies and procedures that address risk areas for possible incorporation into the Compliance Program.
- Reviewing and monitoring Compliance Program training and education to ensure that they are effective and completed in a timely manner.
- Ensuring that Advocates has effective systems and processes in place to identify Compliance Program risks, overpayments, and other issues and has effective policies and procedures for correcting and reporting such issues.
- Working with departments to develop standards and policies and procedures that address specific risk areas and to encourage compliance according to legal and ethical requirements.
- Coordinating with the Compliance Officer to ensure that the written policies and procedures, and Standards of Conduct are current, accurate, and complete.
- Developing internal systems and controls to carry out compliance standards, Standards of Conduct, and policies and procedures.
- Coordinating with the Compliance Officer to ensure communication and cooperation by Affected Individuals on compliance-related issues, internal or external audits, or any other function or activity.
- Developing a process to solicit, evaluate, and respond to complaints and problems.
- Monitoring internal and external audits to identify issues related to non-compliance.
- Implementing corrective and preventative action plans and follow-up to determine effectiveness.
- Ensuring the development and implementation of an annual Corporate Compliance Work Plan.
- Advocating for sufficient funding, staff, and resources to be allocated to the Compliance Officer to carry out duties related to the Compliance Program.
- Ensuring that Advocates has appropriate systems and policies in place that effectively identify risks, overpayments, and other areas of concern including fraud, waste, and abuse.



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	<ul style="list-style-type: none">• Monitoring and evaluating Advocates' Compliance Program for effectiveness and making recommendations for necessary modifications to the Compliance Program as applicable. <ol style="list-style-type: none">2. The Compliance Committee oversees and delegates responsibilities to the Compliance, Quality, Executive Leadership Team Subcommittee and the Compliance, Quality, Service Departments Subcommittee as the Compliance Committee deems necessary and appropriate.3. The Compliance Committee reviews the minutes and assesses the activities of the Compliance, Quality, Executive Leadership Team Subcommittee and the Compliance, Quality, Service Departments Subcommittee as they relate to implementing and maintaining an effective Compliance Program4. The Compliance Committee shall conduct an annual evaluation of the effectiveness of the Compliance Program.5. The Compliance Committee shall review and reassess its Charter at least annually and submit any recommended changes to the Executive Director for consideration.6. The Compliance Committee shall perform such other functions and have such other powers as may be necessary or convenient for efficient discharge of its duties.
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