



Corporate Compliance Program Statement

The Council of Community Clinics has an established Corporate Compliance Program in order to effectively prevent, detect, and resolve inappropriate business practices, improper conduct, and/or violations of law, with a further goal to foster an ongoing effort to improve quality of operational performance.

This statement applies to The Council of Community Clinics (CCC), and its subsidiaries including the Community Clinics Health Network (CCHN) and Council Connections (CC), the Group Purchasing Organization.

Objectives of the Corporate Compliance Program

The CCC is committed to the delivery of high quality services while conducting its business in full compliance with all statutes, regulations and guidelines applicable to federal health care programs and California state laws. The CCC seeks to prevent and detect unlawful and/or improper conduct by its employees, contractors, business associates, and other stakeholders. The CCC has implemented and will maintain an effective compliance program that will avoid improper conduct and/or inappropriate business practices.

Purposes of the Corporate Compliance Program

- Define the business and professional practice standards of conduct by which all CCC employees are expected to comply.
- Emphasize our commitment to compliance with all statutes, regulations, and guidelines applicable to federal health care programs and California state laws.
- Establish an organizational structure and delineate responsibilities of the compliance efforts throughout the CCC.
- Maintain a confidential disclosure program to include a problem resolution process, by which employees may ask questions and report concerns or compliance issues.
- Maintain a process for continuous auditing and monitoring of the operational activities and business practices of the CCC.
- Ensure consistent enforcement of standards and procedures through prompt response and appropriate corrective action.
- Reinforce that all employees of the CCC operate in an environment of honesty and integrity.

For further information about the Council of Community Clinics' Corporate Compliance Program, contact Linda Johnson, Corporate Compliance Officer for CCC/CCHN at 619-542-4313, or Tracy Garmer, Corporate Compliance Officer for CC, at 619-542-4349.