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Executive Offices
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CORPORATE COMPLIANCE COMMITTEE CHARTER

I. Purpose

A. The Corporate Compliance Committee assists the Access: Supports for Living Network which includes, Access: Supports for Living, Inc. and affiliates, The Guidance Center of Westchester, New York Families for Autistic Children, Inc., and Meaningful New York ("The Agency") in overseeing the Agency's activities in the areas of corporate compliance.

B. The Committee shall have the authority to undertake the specific duties and responsibilities described below and the authority to undertake such other duties as are assigned by law, the Agency's certificate of incorporation or bylaws, or by the Board.

II. Membership

A. The Compliance Committee is chaired by the Compliance Officer or designee and comprised of members including senior managers and others appointed by the Compliance Officer. Additional members may be designated to serve solely on sub-committees. The Compliance Officer appoints members to the Compliance Committee with varying backgrounds and experience to ensure that the Compliance Committee has the expertise to handle the full range of clinical, administrative, operational and legal issues relevant to the Program.

B. Resignation/Removal/Vacancies: Committee members may resign, with the support of their supervisor, at any time by submitting a written letter of resignation to the Compliance Officer or a committee member may be removed by a decision from the Compliance Officer. Absence may be excused for good cause only by the Compliance Officer or designee. A committee member who seeks an excused absence has the responsibility to contact the Compliance Officer or designee, in advance of the meeting. Upon resignation or removal or vacancy of a committee member, a replacement member shall be recommended by the Compliance Committee, subject to approval from the Compliance Officer.

C. Term: Committee members will serve until resignation or removal. The composition of the Committee will be reviewed annually by the Compliance Officer and Chief Executive Officer or designee with the intent to maintain a composition of members with relevant experience to serve on subcommittees. Unexcused absences will be taken into consideration in the evaluation of a Committee member's performance.

III. Meetings and Procedures

A. Committee meetings will be regularly scheduled at predetermined places and times, but not less than quarterly. Committee members are expected to regularly attend all meetings. In addition to regularly scheduled meetings the Compliance Officer or Chief Executive Officer or designee shall have authority to call a special meeting.

B. The Committee shall work with Agency management to ensure that the Board appoints a Compliance Officer for the Agency. The Committee shall meet periodically with the Compliance Officer in a separate

Executive Leadership: Ronald J. Colavito, *President & Chief Executive Officer*
Board Officers: Liz O'Halloran, *Chairperson*; Mitzi Ambrose-Washington, *Vice-Chairperson*; Melissa Dewitt, *Secretary*; John Finneran *Treasurer*

executive session to discuss such matters which the Committee members believe should be considered privately.

C. In discharging its responsibilities, the Committee shall have sole authority to, as it deems appropriate, select, retain and/or replace outside advisors to provide independent advice to the Committee.
D. The Committee shall maintain written minutes or other records of its meetings and activities. Minutes of each meeting of the Committee shall be distributed to the CEO and to committee members upon request. The Secretary of the Committee shall retain the original signed minutes for filing with the corporate records of the Agency.
E. The Compliance Officer shall report to the Board quarterly, and as otherwise requested by the Chairman of the Board.

IV. Responsibilities

A. The Committee shall oversee the Agency's activities in the area of compliance ("Compliance Program") that may impact the Agency's business operations or public image, in light of applicable government and industry standards, as well as legal and business trends and public policy issues:

1. Coordinating with the Compliance Officer to ensure that the written policies and procedures and required standards of conduct are current, accurate, and complete, and that the required training topics are completed timely.
2. Coordinating with the Compliance Officer to ensure that communication and cooperation by affected individuals on compliance-related issues, internal or external audits, or any other function or activity required in the regulations.
3. Ensuring that the Compliance Officer is allocated sufficient resources, funding, and staff to fully perform their responsibilities.
4. Ensuring that effective systems and processes are in place to identify Compliance Program risks, overpayments and other issues, and effective policies and procedures for correcting and reporting such issues.
5. Enacting required modifications to the Compliance Program.
6. The Committee shall assess management's implementation of the Compliance Program elements, including:
    a. The Compliance Officer's direct access to senior management;
    b. The Agency's Code of Conduct and written compliance policies and procedures that guide the Agency and the conduct of its staff in day-to-day operations, and relevant education and training for the Board and all affected staff and the Agency's agents;
    c. Appropriate mechanisms for staff to seek guidance and to report concerns without fear of retaliation;
    d. The Agency's systems and processes that are designed to:
        i. Periodically assess the Agency's compliance obligations and associated risks;
        ii. Monitor and audit the Agency's systems, processes and transactions;
        iii. Investigate alleged misconduct;
        iv. Implement appropriate corrective and preventive actions; and
        v. Promote and enforce standards through incentive and disciplinary actions;

e. Efforts made to promote an ethical culture.

7. The Compliance Officer will report to the Committee any data suggesting significant non-compliance that could affect the Compliance Program or the Agency. Any data suggesting significant non-compliance involving any of the Agency's officers shall be reported to the CEO or Board President immediately.