

SUBJECT: CONFLICT OF INTEREST POLICY FOR DIRECTORS, OFFICERS, AND OTHER COVERED PERSONS

1.0	POLICY/PURPOSE	Classification:	Governance
2.0	APPLICABILITY	Policy#:	9120-0007
3.0	GENERAL INFORMATION	Effective Date:	April 6, 2021
4.0	PROCEDURE	Revised Date:	N/A
5.0	RECORDS OF PROCEEDINGS		
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7.0	ANNUAL STATEMENTS OF DISCLOSURE		
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1.0 POLICY/PURPOSE

1.1 Center for Disability Services and St. Margaret’s Center (collectively, the “Organization”) are committed to compliance with applicable federal and state laws, rules, and regulations governing conflicts of interest. A director, officer, or other Covered Person of the Organization may have a private interest that conflicts with, or appears to conflict with, the interests of the Organization. These individuals owe to the Organization a duty of loyalty which, among other things, requires that they, in serving the Organization, act solely in the interests of the Organization, and not in their personal interests or in the interests of their relatives, businesses, or others. It is the Organization’s policy that full disclosure of any interest that conflicts with, or appears to conflict with, the interests of the Organization is required in order for the Transaction to be reviewed in the manner set forth herein.

1.2 The purpose of this Policy is to: (a) aid the Organization’s directors, officers and other Covered Persons in meeting their ongoing duty, obligation and responsibility to act in the interest of the Organization by disclosing any interests that conflict or appear to conflict with the interests of the Organization; (b) protect the interests of the Organization in the event it is contemplating entering into a Transaction that may benefit the private interest(s) of a director, officer, or other Covered Person; and (c) comply with applicable federal and state laws, rules, and regulations governing conflicts of interest, including, but not limited to, Internal Revenue Service reporting requirements and New York State Not-For-Profit Corporation Law. This Policy is intended to supplement, but not replace, such applicable federal and state laws, rules and regulations.

2.0 APPLICABILITY

2.1 This policy applies to all Center for Disability Services, St. Margaret’s Center and Prospect Center employees and affiliates (hereinafter known as the Center or Organization).

3.0 GENERAL INFORMATION

3.1 Definitions:

- 3.1.1 Conflict of Interest. As determined in accordance with this Policy, a Conflict of Interest may exist when (i) a Covered Person is in a position to make, influence, or participate in the Organization’s decision to enter into a Transaction with a Covered Person, or a Family Member of the Covered Person, who benefits from such Transaction as the result of a Financial or Non-Financial Interest, and/or (ii) the Organization has entered into, or is contemplating entering into, a Transaction with a Covered Person, or the Family Member of the Covered Person, who benefits from such Transaction as the result of a Financial or Non-Financial Interest. For purposes of this Policy, a Conflict of Interest is presumed to exist in all Related Party Transactions.
- 3.1.2 Affiliate. An Affiliate of the Organization includes any entity controlled by, in control of, or under common control with, Center for Disability Services Holding Corporation d/b/a St. Margaret’s Center and/or Center for Disability Services, Inc. For purposes of this definition, “control” means the possession, directly or indirectly, of the power to direct or cause the direction of the management and policies of an entity, whether through ownership, membership rights, and/or voting securities.
- 3.1.3 Compensation. Compensation includes all remuneration in any form, whether direct or indirect, overt or covert, in cash or in kind. Compensation includes, but is not limited to, salary payments, bonuses, severance payments, deferred payments, retirement benefits, fringe benefits, stipends, loan and/or lease payments, the forgiveness of a debt, a decision by the Board to settle or forgo a legal claim or right against an individual or entity, and gifts, favors, and other intangible benefits that are substantial in nature.
- 3.1.4 Compensation Arrangement. Compensation Arrangement means any contract, agreement or understanding involving Compensation, regardless of form of the contract, agreement, or understanding. Compensation Arrangements include, but are not limited to, loans, contracts for the purchase or lease of goods or real property, and agreements to provide services as an employee or independent contractor.
- 3.1.5 CEO. The Organization’s Chief Executive Officer.
- 3.1.6 Covered Employee. A Covered Employee means any:
- Officer of the Organization;
 - Medical Director of the Organization; or
 - Key Person.
- 3.1.7 Covered Person. A Covered Person means a:
- member of the Organization’s Board of Directors;
 - member of a committee or advisory board of the Board of Directors or Organization; or
 - Covered Employee.
- 3.1.8 Family Member. Family Member means a person’s spouse, domestic partner, partner or significant other, ancestors, children (whether natural or adopted), grandchildren, great-grandchildren,

siblings (whether whole or half-blood), and the spouses, domestic partners, partners or significant others of children, grandchildren, great-grandchildren, and siblings.

- 3.1.9 Financial Interest. A person has a Financial Interest if the person (or a Family Member) has:
- an Ownership or Investment Interest in (i) any entity with which the Organization has a Transaction, (ii) any entity with which the Organization is competing for a Transaction, or (iii) any entity that will benefit or be adversely affected as a result of a Transaction contemplated by the Organization; or
 - a Compensation Arrangement with (i) the Organization, (ii) any entity or individual with which the Organization has a Transaction, (iii) any entity or individual with which the Organization is competing for a Transaction, or (iv) any entity or individual that will benefit or be adversely affected as a result of a Transaction contemplated by the Organization; or
 - a potential Ownership or Investment Interest in, or Compensation Arrangement with, any entity or individual (i) with which the Organization is negotiating a Transaction, (ii) with which the Organization is competing for a Transaction, or (iii) that will benefit or be adversely affected as a result of a Transaction contemplated by the Organization. A person has a “potential” Ownership or Investment Interest or Compensation Arrangement if the person is actively investigating or negotiating, or is legally obligated, to acquire such interest or to enter into such Compensation Arrangement.
 - A Financial Interest is not necessarily a Conflict of Interest. A Covered Person who has a Financial Interest has a Conflict of Interest if involved in a Related Party Transaction or it is otherwise determined that a Conflict of Interest exists.
- 3.1.10 In Competition. Another entity or individual that is competing with the Organization for a particular Transaction or would benefit or be adversely affected, financially or otherwise, as a result of a Transaction contemplated by the Organization.
- 3.1.11 Key Person. A(n) (a) Key Employee on the Organization Form 990 for the preceding tax year; (b) Employee identified as one of the Organization’s highest compensated employees on the Organization’s Form 990 for the preceding tax year; (c) person, other than a Covered Person, whether or not an employee of the Organization, who (i) has responsibilities, or exercises powers or influence over the Organization as a whole, similar to the responsibilities, powers or influence of directors, officers, or Medical Directors; (ii) manages the Organization, or a segment of the Organization that represents a substantial portion of the

activities, assets, income or expenses of the Organization, or (iii) alone or with others controls or determines a substantial portion of the Organization's capital expenditures or operating budget.

3.1.12 Non-Financial Interest. A person has a Non-Financial Interest in any entity of which the person (or a Family Member) either is or has actual knowledge that he or she is being considered for election or appointment as (a) an officer or director of the Board of Directors of the Organization, or (b) a member of a committee or advisory board of the Board of Directors or Organization. However, a person who serves as an unsalaried officer or director of a not-for-profit corporation which, having all requisite approvals, exists for the purpose of raising funds for the operation and maintenance of, or to provide administrative, planning and research support services to, the Organization does not have a Non-Financial Interest with respect to this Policy.

- A Non-Financial Interest is not necessarily a Conflict of Interest. A Covered Person who has a Non-Financial Interest may have a Conflict of Interest only if it is determined that a Conflict of Interest exists.

3.1.13 Ownership or Investment Interest. Any beneficial interest in an entity, whether through debt, equity, or otherwise, is an ownership or investment interest. Such interest includes, but is not limited to, stock, ownership (either voting power or value) of a corporation, profits or capital interest in a partnership or limited liability company, membership interest in a nonprofit organization, or beneficial interest in a trust, as well as loans, bonds or other financial instruments that are secured by an entity's property or revenue. Ownership includes indirect ownership (e.g., ownership in an entity that had ownership in the entity in question); there may be multiple tiers of entities. Notwithstanding the foregoing, ownership of the following shall not be considered to be an ownership or investment interest for the purposes of this Policy:

- Ownership of investment securities (including shares or bonds, debentures, notes, or other debt instruments) which were purchased on terms generally available to the public and which are:
 - securities listed for trading on the New York Stock Exchange, the American Stock Exchange, or any regional exchange in which quotations are published on a daily basis, or foreign securities listed on a recognized foreign, national, or regional exchange in which quotations are published on a daily basis, or
 - traded under an automated interdealer quotation system operated by the National Association of Securities Dealers, and
 - in a corporation that had, at the end of the Organization's most recent fiscal year, or on

average during the previous 3 fiscal years, total assets exceeding \$75,000,000.

- Ownership of shares in a regulated investment company as defined in section 851(a) of Title 26, if such company had, at the end of the company's most recent fiscal year, or on average during the previous 3 fiscal years, total assets exceeding \$75,000,000.

3.1.14 Related Party. A Related Party means:

- a Covered Person;
- a Family Member of a Covered Person; or
- any entity in which a Covered Person or Family Member has a direct or indirect ownership or beneficial interest.

3.1.15 Related Party Transaction. A Related Party Transaction means any Transaction in which:

- a Related Party has a Financial Interest, and
- the Organization or an Affiliate is a participant.

3.1.16 Transaction. Any action by the Organization which may produce a commercial or personal benefit to an individual or to a limited number of individuals (as opposed to the public at large) is a transaction. Transaction includes, but is not limited to, contracts for sale, lease, license, loans, and agreements to provide services as an employee or independent contractor, whether initiated during the Organization's tax year or ongoing from a prior year. A Transaction also includes joint ventures, whether new or ongoing, in which either the profits or capital interest of the Organization and the individual each exceed ten percent (10%), and decisions to sue or to forbear from bringing suit. For the purpose of this Policy, Transaction does not include any arrangement exclusively between or among Center for Disability Services Holding Corporation d/b/a St. Margaret's Center, Center for Disability Services, Inc., and/or their respective Affiliates.

4.0 PROCEDURE

4.1 Duty to Disclose. All Covered Persons have a duty to disclose to the Organization any Financial or Non-Financial Interests that may give rise to a Conflict of Interest. In making such disclosures, the following shall apply:

a. Covered Persons shall disclose annually such interests by completing, signing, and submitting an Annual Statement of Disclosure. New members of the Board of Directors, or a committee or advisory board of the Board of Directors or Organization, shall submit an initial Annual Statement of Disclosure prior to their election. A Covered Person has a continuing obligation to update this information between reporting periods.

b. When the Organization is considering a proposed Transaction, a Covered Person has a continuing obligation to timely disclose the existence and nature of any Financial or Non-Financial Interest that may give rise to an actual or potential

Conflict of Interest, regardless of whether such interest has been disclosed on the Annual Statement of Disclosure:

i. Transactions Approved by the Board or Board Committee.

A. If the Covered Person is a member of the Organization's Board of Directors, member of a committee or advisory board of the Board of Directors or Organization, or Covered Employee, the Covered Person shall be given an opportunity to disclose in good faith all material facts regarding his or her Financial or Non-Financial Interest to the Board of Directors or committee. If the Covered Person is not present or does not inform the Board or committee of the pertinent facts, such disclosure must be made by any other Director, committee member, or management who has knowledge of the facts.

B. In lieu of making such disclosures at a meeting of the Board of Directors or committee, the Covered Person may disclose such information to the Board Chairperson or committee chairperson, or his or her designee, prior to the meeting at which such Transaction is to be reviewed by the Board of Directors or committee (*see* Section 3.2(a)(i)(B) for next steps).

ii. Transactions Approved by Management. Covered Employees to whom this Policy applies shall be given an opportunity to disclose all material facts regarding his or her Financial or Non-Financial Interest to the appropriate party in accordance with Sections 3.2(b) and 3.2(c), respectively.

c. Any person to whom this Policy applies, who has knowledge of the existence of a Covered Person's Financial or Non-Financial Interest, has a duty to disclose such facts to the party contemplating a proposed Transaction.

d. A Covered Person is prohibited from attempting to influence improperly the deliberation or voting on any matter or Transaction giving rise to a Conflict of Interest.

4.2 Determining Whether a Conflict of Interest Exists. The Board of Directors has ultimate responsibility for determining whether a Conflict of Interest exists. Such determination shall be binding upon all parties subject to this Policy. A party's initial determination as to whether a Conflict of Interest exists may be subject to further review by the Board of Directors.

a. Transactions Approved by the Board or Board Committee.

i. Prior to any meeting of the Board of Directors or committee, the Board Chairperson or committee chairperson shall review the Disclosure Summary Report to determine if a Transaction that is being considered at a particular meeting is a Related Party Transaction (including those with a Covered Employee) or if a member of the Board of Directors or committee otherwise has a Financial or Non-Financial Interest in the Transaction:

A. If an interest has been disclosed on an Annual Statement of Disclosure, the Covered Person shall be contacted by the Board Chairperson or committee chairperson to discuss the matter.

B. After such discussion, or after a Covered Person has made a disclosure under Section 3.1(b)(i)(B), the Board Chairperson or committee chairperson shall determine whether the interest presents a possible Conflict of Interest. If it does, the Board Chairperson or committee chairperson shall ask the member of the Board of Directors or committee to recuse him/herself when the Board of Directors or committee is considering the Transaction. *Where a recusal occurs, it is presumed that a Conflict of Interest exists.*

C. If the member of the Board of Directors or committee refuses a request to recuse, then the matter shall be presented to the Board of Directors or committee to determine whether a Conflict of Interest exists in accordance with Section 3.2(a)(ii).

D. The Board Chairperson or committee chairperson shall document all determinations regarding possible Conflicts of Interest (including those where it has been determined that a conflict does not exist) and report such determinations to the Board of Directors or committee prior to the discussion of the Transaction.

E. The Board Chairperson or committee chairperson shall have the discretion to present any potential Conflicts of Interest to the Board of Directors or committee at any time.

ii. If a Covered Person discloses an interest at a meeting of the Board of Directors or committee, or if the matter is brought to the meeting of the Board of Directors or committee under Section 3.2(a)(i)(C) (refusal to recuse), the Covered Person shall leave the meeting while the Board of Directors or committee determines whether a Conflict of Interest exists. The remaining members of the Board of Directors or committee shall discuss and vote on the existence of a Conflict of Interest in accordance with Section 3.3(a)(v).

iii. If it is determined that a Conflict of Interest exists, or where a recusal has occurred, the Board of Directors or committee shall follow the procedures set forth in Section 3.3 when evaluating and voting on the Transaction. All Related Party Transactions identified shall be referred to the Board of Directors for consideration or approval, unless the Board of Directors has authorized the committee to act on its behalf.

b. Transactions Approved by Management.

i. The CEO, in consultation with the Compliance Officer, shall review the Disclosure Summary Report when a Transaction is being contemplated by management and determine whether a Conflict of Interest exists for any Covered Employee who is participating in the decision-making for the Transaction or is in a

position to influence such decision-making. If a Related Party Transaction, the matter will be referred to the Board of Directors or committee for review and approval.

ii. If it is determined that a conflict exists, the CEO (or his or her designee) shall ask the Covered Employee to recuse him/herself from participating in such decision-making and/or from exerting any influence over such decision-making, and/or shall determine if any additional or alternative actions need to be taken.

iii. Notwithstanding the foregoing, Covered Employees have a continuing obligation to self-identify any potential Conflicts of Interest and remove themselves from the decision-making process.

4.3 Procedures for Addressing the Conflict of Interest. It is not unlawful for the Organization to enter into a Transaction in which a Conflict of Interest exists, including Related Party Transactions, so long as the Transaction is determined to be fair, reasonable and in the best interest of the Organization at the time the Transaction is contemplated in accordance with the following rules:

a. Transactions Approved by the Board or Board Committee. Where it has been determined by the Board of Directors or committee that a conflict exists, or a member of the Board of Directors or committee has recused him/herself due to a presumed Conflict of Interest, approval of such Transactions shall occur as follows:

i. A Covered Person may share with the Board of Directors or committee information about, or his or her view of, the Transaction, but he or she shall leave the meeting during the discussion and deliberation of, and the vote on, the Transaction that results in the Conflict of Interest.

ii. The Board Chairperson or committee chairperson shall, if appropriate, appoint a disinterested person or committee to investigate alternatives to the proposed Transaction to the extent any alternatives are available.

iii. After exercising due diligence, the Board of Directors or committee shall determine whether the Organization can obtain a more advantageous Transaction with reasonable efforts from a person or entity that would not give rise to a Conflict of Interest.

iv. If a more advantageous Transaction is not reasonably attainable under circumstances that would not give rise to a Conflict of Interest, the Board of Directors or committee shall determine by a majority vote of the disinterested Board of Directors or committee members present at the meeting whether the Transaction is in the Organization's best interest and for its own benefit and whether the Transaction is fair and reasonable to the Organization. The Board of Directors or committee shall make its decision as to whether to enter into the Transaction in conformity with such determination.

v. The scope of the Covered Person's participation in the decision-making process for the Transaction being contemplated, where an actual or potential Conflict of Interest exists, is as follows:

A. Deliberations. The Covered Person may not participate in or be present for the deliberations, nor use personal influence in the matter.

B. Quorum. The Covered Person may not be counted in determining the presence of a quorum at a meeting of the Board or committee when authorizing the Transaction.

C. Voting. The Covered Person's vote may not be counted in determining whether to enter into the Transaction.

b. Transactions Approved by Management. Covered Employees shall present any additional information requested by the CEO and Compliance Officer regarding his or her Financial or Non-Financial Interest. Such employees shall not participate in any decisions regarding a Transaction in which it has been determined a Conflict of Interest exists.

4.4 Violations of the Conflicts of Interest Policy.

a. Board or Board Committee Members.

i. If the Board of Directors or committee has reasonable cause to believe that a person subject to this Policy has failed to disclose an actual or potential Conflict of Interest, the Board of Directors or committee shall inform the person of the basis for such belief and afford the person an opportunity to explain the alleged failure to disclose.

ii. If, after hearing the response of the person and making such further investigation as may be warranted in the circumstances, the Board of Directors or committee determines that the person has in fact failed to disclose an actual or potential Conflict of Interest, it shall take appropriate disciplinary and corrective action, which may include the decision by the Board of Directors to terminate the person's relationship with the Organization.

iii. If a Covered Person has not made a full disclosure to the Board of Directors, or if the vote of the Covered Person was needed to authorize the Transaction or the presence of the Covered Person was necessary to achieve a quorum, the Transaction shall be voidable at the option of the Organization. This means that the Organization has the right, in its sole discretion, to set aside and rescind the Transaction, but may also insist upon the enforcement of the Transaction.

b. Covered Employees. If the CEO and Compliance Officer determine that a possible Conflict of Interest has not been reported, appropriate disciplinary and corrective action shall be taken in accordance with the Organization's policies and procedures.

5.0 RECORDS OF PROCEEDINGS

5.1 The minutes of the Board of Directors or committee contemplating a Transaction for which Conflict of Interest has been disclosed shall contemporaneously document the following:

a. Transactions Approved by the Board or Board Committee.

i. The names of the persons who disclosed or otherwise were found to have a Financial or Non-Financial Interest in connection with an actual or potential Conflict of Interest, the nature of the interest, any action taken to determine whether an actual or potential Conflict of Interest was present, any alternative Transactions considered, and the basis for any decisions by the Board of Directors or committee as to whether a Conflict of Interest, in fact, existed.

ii. The names of the persons who were present for discussions and votes relating to the Transaction and a record of any votes taken in connection therewith.

iii. A notation that the persons who disclosed or otherwise were found to have a Financial or Non-Financial Interest in connection with an actual or potential Conflict of Interest were not present for such discussions, deliberations and votes.

b. Transactions Approved by Management. The CEO, or his or her designee, shall maintain a record of all evaluations and determinations made regarding potential Conflicts of Interest disclosed by Covered Employees.

6.0 COMPENSATION MATTERS

6.1 Any person who receives Compensation, directly or indirectly, from the Organization for services is precluded from being present for, or participating in, the deliberations and voting on matters pertaining to that person's Compensation.

6.2 Physicians who receive Compensation, directly or indirectly, from the Organization, whether as employees or independent contractors, are precluded from membership on any committee whose jurisdiction includes Compensation matters and, if a voting member of the Board of Directors, are precluded from discussing and voting on matters pertaining to other physicians' Compensation. No physician, either individually or collectively, shall be prohibited by this Policy from providing information to the Board of Directors, or any committee or advisory board of the Board of Directors or Organization, regarding physician Compensation.

6.3 The Board of Directors or an authorized committee may request a person who may benefit from a Compensation Arrangement to present information as background or answer questions at the meeting of the Board of Directors or committee prior to the commencement of deliberations and voting.

7.0 ANNUAL STATEMENTS OF DISCLOSURE

7.1 The Board of Directors has delegated to the Finance, Compliance and Audit Committee of the Board oversight authority for the implementation and compliance with this Policy, including the distribution and collection of the Annual Statements of Disclosure, gathering of any additional information needed, and producing a summary report of all Financial and Non-Financial Interests disclosed by Covered Persons (“Disclosure Summary Report”).

7.2 On an annual basis, the Finance, Compliance and Audit Committee (or its designee) shall request that Covered Persons complete and sign an Annual Statement of Disclosure. Any individuals being considered for initial election to the Board of Directors are required to do so prior to election.

7.3 Covered Persons are required to complete an Annual Statement of Disclosure and submit such form to the Compliance Officer, or his or her designee, within thirty (30) days of any request to complete one or the date specified in the request (if different).

7.4 The Compliance Officer shall provide to the Chairperson of the Finance, Compliance and Audit Committee (or his or her designee), upon request, a copy of all Annual Statements of Disclosure received for processing and, if necessary, follow-up.

7.5 The Annual Statement of Disclosure shall include an affirmation by the signatory that he or she:

- a. has received a copy of this Conflict of Interest Policy;
- b. has read and understands the policy;
- c. agrees to comply with the policy;
- d. understands that the policy applies to all committees and advisory boards of the Board of Directors or Organization;
- e. understands that the Organization is a charitable organization and that in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes;
- f. understands that he or she is prohibited from attempting to influence improperly the deliberation or voting on any matters giving rise to a Conflict of Interest;
- g. discloses any and all Financial or Non-Financial Interest(s) which has the appearance of a Conflict of Interest; and
- h. understands that the failure to submit the Annual Statement of Disclosure in a timely manner may result in the termination of the person’s relationship with the Organization, as determined by the Board of Directors.

7.6 The Finance, Compliance and Audit Committee shall report to the Board of Directors at least annually the results of the Annual Statements of Disclosure process,

including the Disclosure Summary Report. The Board of Directors, and in particular the Board Chairperson and committee chairs, shall use such information to (i) assist in identifying potential conflicts that may arise at meetings of the Board of Directors and committees and, in such case, to ensure compliance with Section 3.2 and 3.3 of this Policy, and (ii) take such other steps as may appear necessary to protect the Organization from a Conflict of Interest.

7.7 The Compliance Officer (or his or her designee) shall report to the CEO the results of the Annual Statements of Disclosure process, including the Disclosure Summary Report, relating to Covered Employees. The CEO will use such information to (i) identify potential conflicts that may arise in connection with the decisions made by the Organization, and (ii) take such other steps as may appear necessary to protect the Organization from a Conflict of Interest on the part of a Covered Employee.

6.7 The failure to submit the Annual Statement of Disclosure in a timely manner by any Covered Person may result in the termination of his or her relationship with the Organization, as determined by the (i) Board of Directors in the case of a member of the Board of Directors, a committee or advisory board of the Board of Directors or Organization or the CEO, or (ii) CEO in the case of a Covered Employee.

8.0 REFERENCES

- 8.1 Internal Revenue Service, Exempt Organizations Annual Reporting Requirements
- 8.2 New York Not-For-Profit Corporation Law §§ 715 & 715-A

9.0 ATTACHMENTS

- 9.1 Conflict of Interest Disclosure Form

10.0 POLICY APPROVAL

Role	Name/ Title	Date Approved
Author	Marc Antonucci, Esq.	4/6/2021
Department Approver	Board of Directors	4/6/2021
Review/ Formatting	Sarah Quist/ Compliance Officer	2/1/2024

Sanction Statement: Non-compliance with this policy may result in disciplinary action, up to and including termination.

Compliance Statement: As part of its ongoing auditing and monitoring process in its Compliance Program, Center for Disability Services will review this policy based on changes in the law or regulations, as Center for Disability Services’ practices change, and, at minimum, on an annual basis. Additionally, this policy will be tested for effectiveness on an annual basis or more frequently as identified in accordance with Center for Disability Services’ Compliance Program. Testing will include but is not limited to ensuring that the policy is appropriately followed; the policy is effective; the policy has been disseminated to all affected individuals, as well as notified of any updates or changes.

Tracking of the criteria above and results of this testing will be completed by the Compliance Officer, or designee. Additionally, results will be reported to the Compliance Committee and Governing Body on a regular basis.

Record Retention Statement: Center for Disability Services will retain this policy and all subsequent revisions, and any related documentation will be retained for a period of, at minimum, six years.