

# COMPLIANCE RESOURCE GROUP, INC.

## ETHICS & COMPLIANCE CONSULTING FOR ORGANIZATIONS

Compliance Resource Group is a consulting and advisory group of compliance specialists committed to providing its clients with the guidance and tools necessary to create, implement and sustain an effective corporate compliance and integrity program. The goal of Compliance Resource Group (CRG) is to promote and foster ethical business practices with clients who share a commitment to high standards of ethical and legal conduct.

CRG is a subsidiary of the Council of Ethical Organizations, a non-profit, non-partisan organization dedicated to promoting ethical and legal conduct in business, government and the professions. Since its inception in 1980, the Council has pursued this purpose through educational programs, research on best practices, and program development efforts.

CRG applies the research and knowledge developed by the Council in providing assistance and guidance to the needs and concerns of its clients on a project or program basis.

### SPECIFIC SERVICES

CRG can assist clients in the development of a corporate compliance/integrity plan and in the implementation and maintenance of a compliance program. Working on either a project basis, or under retainer, CRG provides the necessary expertise and guidance for each client to create an effective compliance effort. Our work emphasizes that even technical compliance efforts must reflect an organization's mission and values.

Two primary service areas are:

#### COMPLIANCE PROGRAM ASSESSMENT:

CRG can undertake a compliance program assessment process designed to assist organizations in reviewing their overall compliance efforts. Our process includes a comprehensive analysis of an existing compliance program, and identifies appropriate changes to fortify the program and to help meet its objectives on an ongoing basis. We conduct both a desk review of compliance program materials (such as Code of Conduct, compliance policies and procedures, board reports) and on site interviews with staff. The goal of site interviews is to obtain real unfiltered and unbiased information concerning how well the compliance program is achieving its objectives. We believe that our process results in a valid, corroborated and real time analysis of the organization's compliance efforts.

Our program assessment process has been widely used for many years by organizations of most types and sizes. The program assessment process also allows the client to compare their organization's program activities to those of organizations that have achieved "best practices" in their compliance regimens. Our written assessment report may also provide the board of directors and executive management with concrete evidence that they are addressing their governance responsibilities by providing oversight of the company's compliance efforts.

#### THE ETHICS-COMPLIANCE SURVEY:

In conjunction with the Council of Ethical Organizations, Compliance Resource Group can undertake proven research efforts and services designed to meet the practical needs of clients. The Ethics-Compliance Survey is recognized as the only empirically valid instrument for assessing the compliance environment of organizations. The Survey establishes a baseline assessment of the organization's compliance environment. It allows you (at your option) to compare your organization to all healthcare organizations in the Survey database and to all plans or providers in the Survey database. And, it is presented in a written report consisting of an executive summary, detailed findings and specific recommendations.

The Ethics-Compliance Survey has been utilized by organizations with only a few hundred employees as well as those with several thousand. Given its very extensive database, the Survey allows benchmarking by size and industry, identification of compliance risk areas, and the assessment of program effectiveness within the organization.

Other services provided by Compliance Resource Group include:

**Corporate Governance Assessment** – utilizing custom-designed tools to 1) educate boards on their essential role in effective corporate governance and compliance program oversight; and 2) evaluate existing systems of corporate governance to ensure they protect the organization and enable the board to meet its fiduciary responsibilities. These tools come together as an evaluation process that allows the board to assess its compliance with current ethical and legal expectations and to ensure it is providing proper oversight to the compliance function.

# COMPLIANCE RESOURCE GROUP, INC.

**Compliance Risk Assessment** – conduct an extensive review of client operations to ascertain its specific compliance risks that need to be addressed in an effective compliance effort. Once such risks are quantified, CRG assists the client in the creation of an appropriate compliance fortification plan to address those risks and minimize the risk of enforcement oversight by government bodies.

**Creation of Appropriate Compliance Policies and Procedures** - using proven methodologies, help a client develop the written policies necessary to guide employees in meeting their compliance obligations. With a data bank of model policies for most compliance sensitive topics, CRG can individualize written procedures that meet the specific needs of each client.

**Written Code of Conduct** – work with the client to create a written statement of the company’s ethical business principles, employee performance expectations, and the fundamentals of the compliance program. Codes based on models developed by the Council and CRG have been adopted by over one hundred Fortune 1000 companies, government bodies and healthcare organizations.

**Board/Management Training** – intensive compliance training for company management and boards of directors to assure the requisite commitment to, and endorsement of, the client’s compliance effort. A strong commitment from the top level of the company is essential to the long-term effectiveness of any compliance program.

**Compliance Reporting Process** - provide guidance and direction in the creation and implementation of the client’s reporting mechanism, such as a reporting hotline. CRG can also undertake technical training of those charged with the responsibility for its ongoing operation.

## SPECIAL EXPERTISE

CRG consulting professionals have more than fifty years of combined experience in creating, implementing and directing the compliance efforts of numerous national and international corporations. Our practical, hands-on knowledge provides our clients with a unique, proven expertise, which we believe is unmatched in the industry.

We bring experience in legal compliance, clinical ethics issues, compliance management, organizational ethics, and corporate governance. This combination allows us to offer a comprehensive range of personalized service to clients. Our research expertise is unique in the compliance industry.

As a subsidiary of the Council of Ethical Organizations, Compliance Resource Group enhances the Council’s commitment to integrating ethics into corporate operations, and to promoting business integrity in organizations both large and small.

## FOR ADDITIONAL INFORMATION, CONTACT:

COMPLIANCE RESOURCE GROUP, INC.

214 SOUTH PAYNE STREET

ALEXANDRIA, VIRGINIA 22314

TEL: 703-683-7916

E-MAIL: DRREARDON@CORPORATEETHICS.COM