



SQUAXIN ISLAND TRIBE

RESOLUTION NO. 08-10

of the

SQUAXIN ISLAND TRIBAL COUNCIL

WHEREAS, the Squaxin Island Tribal Council is the Governing Body of the Squaxin Island Tribe, its members, its lands, its enterprises and its agencies by the authority of the Constitution and Bylaws of the Squaxin Island Tribe, as approved and adopted by the General Body and the Secretary of the Interior on July 8, 1965; **and**

WHEREAS, under the Constitution, Bylaws and inherent sovereignty of the Tribe, the Squaxin Island Tribal Council is charged with the duty of protecting the health, security, education and general welfare of the tribal members, and with protecting and managing the lands and treaty resources and rights of the Tribe; **and**

WHEREAS, the Squaxin Island Tribal Council has been entrusted with the creation of ordinances and resolutions in order to fulfill their duty of protecting the health, security, education, and general welfare of tribal members, and of protecting and managing the lands and treaty resources of the Tribe; **and**

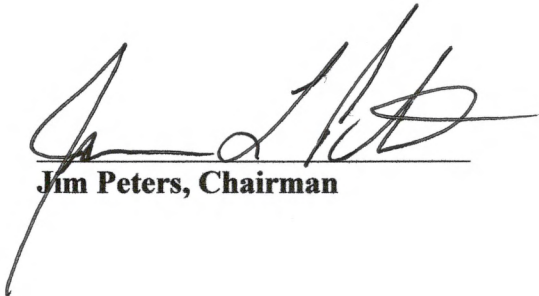
WHEREAS The Squaxin Island Tribe is dedicated to the delivery of effective addiction treatment in an environment characterized by conformance with high standards of accountability in the business functions, clinical, financial and marketing management of Northwest Indian Treatment Center; and is committed to prevent and detect fraud, waste, abuse, fiscal mismanagement and misappropriation of funds,

NOW THEREFORE BE IT RESOLVED that the Squaxin Island Tribal Council authorizes and directs the development and implementation of a corporate compliance plan and policy and actions necessary to prevent and minimize the potential for fraud, waste and abuse in Northwest Indian Treatment Center programs,

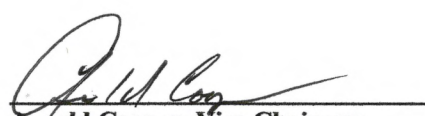
BE IT FURTHER RESOLVED, that the Organization Compliance Policy dated 2-14-08 is approved.

CERTIFICATION


The Squaxin Island Tribal Council does hereby certify that the foregoing Resolution was adopted at the regular meeting of the Squaxin Island Tribal Council, held on this 14th day of February 2008, at which time a quorum was present and was passed by a vote of 5 for and 0 against with 0 abstentions.



Jim Peters, Chairman



Arnold Cooper, Vice Chairman

Attested by: 

Vince Henry, Secretary

**Northwest Indian Treatment Center
PO Box 477, Elma, Washington**

**Residential & Outpatient Services
Organization Compliance Policy**

Policy: It is the policy of the Squaxin Island Tribe and NWITC to address compliance with ethical standards in several areas: business, marketing, service delivery, professional responsibilities, human resources, contractual relationships and grant implementation.

Corporate Compliance Officer: The Director of NWITC is the Corporate Compliance Officer appointment by the Deputy Executive Director as evidenced by memo. The Organizational Compliance Policy is supported by a Tribal Council Resolution. The duties of the CCO include

1. serving as the initial point of contact for the department's corporate compliance issues unless otherwise directed by the Tribe's Executive;
2. development of the corporate compliance plan for NWITC,
3. internal and external monitoring of Department,
4. initiation of an investigation when indicated by calling the Deputy Executive Director, the Director of the Legal Department and ensuring that all documents related to the issue are collected and any destruction of documents ceases.
5. provides an annual report about any corporate compliance issues during the year.

Ethics: Ethics include ethical treatment i.e. services that are respectful, effective, and consistent within an organizational context that values its patients, its employees and its external relationships. It also values efficient business practices. All activities from professional patient record reviews, employee training, staffings, clinical supervision to budgeting and employment practices have as their goal treatment that is consistent with the Mission Statement of the Squaxin Island Tribe and the Mission Statement of the Northwest Indian Treatment Center.

Business practices are under the oversight of Tribal Council, administration, Legal Department and the Finance Department with additional oversight by the Budget Committee. Expenditures and revenue are scrutinized and reported each month. Financial statements provided the Finance Department are compared to records of expenses kept by NWITC. The Finance Department reviews a list of capitol equipment on site each year. The Planning Department and the Finance Department work with NWITC to ensure compliance with expectations of grants. The staff member entering billing data cross checks dates of service and payer with the intake coordinator in the residential program; in the outpatient program a reverse audit occurs twice each year to ensure that patient record entries and encounters billed are consistent. When there is an error of overpayment, the payer is notified. Audits of NWITC petty cash on site are subject to surprise audit.

Tribal policies and practices support transparency, address conflict of interest, and are intended to elicit respect and trust from other businesses with which it interacts and the community. This is an area in which the Tribe has multiple checks and balances to ensure stable operations: audits, review of documents by the legal Department.

Marketing practices of NWITC include making no misleading or false statements about services, access, costs or the scope of its expertise. Changes in charges for service are made upon review of comparable other providers. The Director attends state/tribe meetings to ensure that changing payer and provider requirements are implemented. Brochures and other documents are evaluated annually so that they are accurate. Input is sought by stakeholders each quarter.

The leadership, including Squaxin Island Tribal Council, Squaxin Island Tribal Administration and the Department of Northwest Indian Treatment Center, is committed to prevent and detect waste, fraud, mismanagement and misappropriation of funds, abuse of others and position, and conformance with appropriate regulatory requirements. The organization is committed to prevent wrong doing, whether intentional or unintentional, immediate reporting and investigation and timely correction.

Staff Responsibility: NWITC provides chemical dependency residential adult services and both mental health and chemical dependency outpatient adult and youth services. Delivery of services is characterized by an ethics policy for employees of NWITC (please see Ethics policy and the policy for Unprofessional Conduct). All employees are responsible for reporting conformance to this policy. Responsibilities are described in

1. new employee orientation,
2. annual all employee training,
3. annual performance evaluations,
4. personnel policies and,
5. for counselors, expectations associated with their credential provided by the State of Washington.

In business, marketing and human resource practices, NWITC employees will be guided by the following corporate philosophy: honesty, integrity, respect and fairness in interactions with patients, vendors/suppliers, potential customers, employees and the community.

Delivery of Human Resource services is under the direction of the Human Resource Department; these policies are reviewed by Tribal Council and the Legal Department. Policies and position categories have been reviewed by external experts to ensure that they are fair, complete and clear (please see Personnel Policies). Personnel forms and actions are all reviewed by the Human Resource Department. NWITC staff members have access to the Director of Human Resources and the Deputy Executive Director in order to express concerns and to ask questions. There is also an Administrative Assistant on site at the residential program to assist with personnel concerns. The grievance policy is in the personnel handbook and on site at both the residential and outpatient programs.

Investigation: An investigation of any allegations begins within ten working of the complaint or expression of concern unless there is another agreement between the participants. The length of the investigation and its stages will vary depending on the complexity and nature of the investigation. The Squaxin Island Tribe and NWITC will not retaliate against any person or persons expressing a concern, making a complaint, or filing a grievance. Any patient expressing a concern, or making a grievance may have a support advocate involved and will be so informed. The organization will assume an advocacy stance to support patient complaints. If patient complaints correspond to required reporting laws, the Department of Health and Division of Alcohol and Substance Abuse will be notified.

Contracts: Any concerns involving a contractual relationship will receive a response as indicated in the contract. The Legal Department and the Deputy Executive Director will be notified. Contracts use the Tribe's format approved by the Legal Department and are reviewed annually or bi-annually. Each contract is also monitored by the Finance Department to ensure expenditures relate appropriately to the contact language. Each contracted service provider meets the qualifications attached to their profession and the services described in the contract; copies of their current license and any liability insurance appropriate is kept on file.

If litigation, investigation or complaint occurs all destruction of documents ceases. Relevant records are moved to the Director's office or the Legal Department. Contract compliance is monitored by the Finance Department and, usually, the Planning Department. A few contracts are monitored by Directors in conjunction with WA. State personnel and the Finance Dept.

Legal Conformance: NWITC comply with legal mandates in relationship to the Department of Health, Division of Alcohol and Substance Abuse, State Fire Marshal and national accreditation organizations.

Position Duties: The Squaxin Island Tribal Council designates the over all responsibility for compliance to the Squaxin Island Tribe's Executive Director, the Deputy Director and NWITC Director. Compliance is monitored by

- Semi annual reports made to Tribal Council and Tribal Administration,

- Monthly financial statements and annual audits,
- Human resource monitoring of hiring related practices,
- Time sheet reviews,
- Personnel record reviews,
- Documentation of orientation and training
- Patient record reviews,
- Petty cash documentation and reviews,
- Advisory committee meeting minutes,
- Staff meeting minutes
- Incident reports and
- Outcome reports that include frequent comparisons of services and charges.

In the event of a subpoena, search warrant, investigation or other legal action other than routine request for patient information, the Squaxin Island Legal Department and administration will be notified immediately by the NWITC director. All employees are trained to respond to the arrival on premises of any law enforcement personnel or other persons on the premises without the consent of the director.

Systems within NWITC and the Squaxin Island Tribal Administration provide consistent, regular, multiple levels of review in each area. For a description of corporate citizenship, please see the annual report addendum.

The Director of NWITC and/or the Executive Director of the Squaxin Island Tribe serve as primary points of initial contact for compliance issues. Any compliance concern will be incorporated into a report to the Executive Director by the NWITC Director as soon as it becomes known.

The Squaxin Island Tribe’s leadership affirms this policy by the signature of the Executive Director or his designee.

Executive Director

Date