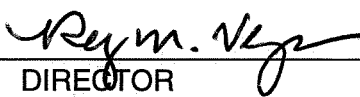


GUAM BEHAVIORAL HEALTH AND WELLNESS CENTER		
TITLE: Corporate Compliance Policy	POLICY NO: AD-F- 01	Page 1 of 3
RESPONSIBILITY: Administration: Financial Management Branch		
APPROVED BY:  DIRECTOR	EFFECTIVE: JUN 15 2017	
	LAST REVIEWED/REVISED:	

PURPOSE:

- A. The Government of Guam policies and procedures relevant to managing and accounting of Federal Grant Funds is outlined in *5 Guam Code Annotated (GCA) Government Operations, Chapter 22, General Fiscal Policies and Control, Article 3, Regulation of Federal Expenditures* which included provisions for accounting for the receipt and expenditures of federal funds. However, this policy did not provide clear, detailed and comprehensive directions describing all accounting functions and related activities performed to ensure adequate control of Federal Funds. As a result the Bureau of Statistic and Plans (BSP) and the Department of Administration (DOA) Federal Program collaborated to develop the *Government of Guam Line Agencies Financial Policies and Procedures*.
- B. The purpose of this procedure is to provide standards by which employees of the Center must conduct themselves in order to protect and promote agency-wide integrity, and to enhance the Center's ability to achieve the Department's mission.

POLICY:

- A. Guam Behavioral Health and Wellness Center as a line agency of the Government of Guam and in accordance with the Government policies and procedures follow and abides by the Regulatory Compliance Policy; the *Guam Line Agency Federal Financial Policies and Procedures (reference attachments)* of the Department of Administration and the *Sub- Recipient Monitoring Policies and Procedures* of the Bureau of Statistics and Plans. *(Reference attachments)*.
- B. The Bureau of Statistics and Plans (BSP), the federal grantee of U.S. Department of Justice Grant funds, and the Government of Guam Dept. of Administration Federal Program Division (DOA-FPD), the Centralized Accounting Agency for the Government of Guam line agencies, are responsible for monitoring sub-recipients and ascertaining that all fiscal, compliance and programmatic responsibilities are fulfilled.
- C. Guam Behavioral Health and Wellness Center shall abide by the Government of Guam's Code of Conduct *(reference DOA Personnel Rules and Regulations)* and *5 GCA Guam Procurement Act Chapter 11 Ethics in Public Contracting*, which are intended to provide additional guidance to personnel functioning in managerial or administrative capacities.
- D. By formal resolution, the Advisory Council has delegated overall responsibility for the Regulatory Compliance Policy and Procedure to the Director. The Director will formally designate a Regulatory Compliance Officer (RCO), monitor the organization's Regulatory Compliance program, and provide quarterly reports to the Advisory Council on matters pertaining to the program.

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- E. The Department is committed to the establishment, implementation, and maintenance of a regulatory compliance program that emphasizes (1) prevention of wrongdoing-whether intentional or unintentional, (2) No reprisal policy to the reporting party, and (3) timely correction of any situation which puts the organization, its leadership or staff, funding sources or consumers, at risk.
- F. All employees are required to attend a brief overview of corporate compliance as part of the Employee Orientation and Compliance Training as necessary, and shall be responsible to ensure that their behavior and activity is consistent with applicable sections of the *Department of Administration Personnel Rules and Regulations, Chapter 3 Code of Conduct of Conduct; 4 GCA Public Officers and Employees Chapter 15 Standards of Conduct; 5 GCA Chapter 56, Article 11 Ethics in Public Contracting and 21 GCA section 63105 Conflict of Interest.*
- G. GBHWC shall follow a Non- Retaliation Policy and "Good Faith" reporting. No retaliation action shall be taken against an employee for reporting in "good faith" any compliance concerns. "Good faith" requires that the employees report information, as they understand it to be true, without fabrication. If an employee feels that they have suffered retaliation, they should report this to the Regulatory Compliance Officer, Deputy Director and/or the Director.
- H. All violations of the Department's and Government of Guam Corporate Compliance Policy and Ethical Codes of Conduct shall; be thoroughly investigated before any disciplinary action or reporting is brought to the Civil Service Commission which has jurisdiction over ethics violation by government employees.

DEFINITION:

RESPONSIBILITIES:

Program Specific Project Managers of the Grants

1. Provides day-to-day oversight.
2. Provides general support and assistance relating to project implementation.
3. Initiates request for reimbursement for expenditures.
4. Reviews the quarterly narrative progress reports.

Administrative Services Officer or Administrative Officer

1. Maintains and control Federal Grants Information, records and data.
2. Develops, maintain and manage a financial system complementary with the Government of Guam AS400 Accounting System. (Appropriation Ledgers, Allotments, Outstanding Encumbrance and Expenditures).
3. Assist program managers in meeting their financial administration, reporting, program delivery responsibilities, budget preparation and analysis, tracking of authorizations and recording of expenditures.
4. Collaborates with other financial and certifying officers, as may be necessary to achieve item #1, 2, and 3 listed above.

Regulatory Compliance Officer (RCO)

1. Shall serve as the primary point of contact for all regulatory compliance issues, investigates all reports of suspected or actual compliance violations.
2. On a regular basis, develop, implement and monitor the Department's regulatory compliance plan, including all internal and external monitoring, auditing, investigating and reporting processes, procedures and systems.
3. Prepare, submit and /or present quarterly and annual reports to the Director and /or Advisory Council on allegations, investigations and or complaints processed in conjunction with the regulatory compliance program, and any recommendation for changes in the Department's policies and procedures.

REFERENCE(S):

5 Guam Code Annotated. *Government Operations, Chapter 22, General Fiscal Policies and Controls, Article 3 Regulations of Federal Expenditures.* Hagatna, Guam.

5 Guam Code Annotated. *Government Operations, Chapter 5 Guam Procurement Act.* Hagatna, Guam.

4 GCA Public Officers & Employees Chapter 15 Standards of Conduct. Hagatna.

Bureau of Statistics and Plans. *Subrecipient Monitoring Policies and Procedures.* Hagatna, Guam.

Chapter 4 GCA; Personnel Policy and Civil Service Commission.

Department of Administration. (2012). *Government of Guam Line Agencies Federal Financial Policies and Procedures.* Hagatna, Guam.

Department of Administration. (1995). *Personnel Rules and Regulations.* Agana, Guam.

SUPERSEDES: Title; Policy No.; Effective Date/signature date; Approving individual's name

ATTACHMENT(S):

1. Bureau of Statistics and Plans. *Subrecipient Monitoring Policies and Procedures.* Hagatna, Guam.
2. Department of Administration. (2012). *Government of Guam Line Agencies Federal Financial Policies and Procedures.* Hagatna, Guam.
3. Department of Administration. (1995). *Personnel Rules and Regulations.* Agana, Guam.

**GUAM BEHAVIORAL HEALTH AND WELLNESS CENTER
REVIEW AND ENDORSEMENT CERTIFICATION**

The signatories on this document acknowledge that they have reviewed and approved the following:

Policies and Procedure


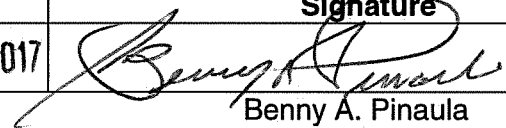
Submitted by: Cydsel V. Toledo

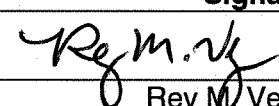
Protocol/Form

Policy No: AD-F-01

Bylaws

Title: Corporate Compliance Policy

Reviewed/Endorsed	Date	Signature
	6/15/17	
Title	Name Title	Cydsel V. Toledo Quality Management
Reviewed/Endorsed	Date	Signature
	JUN 15 2017	
Title	Name Title	Benny A. Pinaula Deputy Director

Reviewed/Endorsed	Date	Signature
	JUN 15 2017	
Title	Name Title	Rey M. Vega Director