



Title: Policy on Organizational Policies	
Review date(s): 3.12.2025; 11.14.2025	Approved by: Jennifer Cathy, President and CEO; Mary LaDuca, COO
Revised date(s): 3.12.2025; 11.14.2025	Policy Owner: Jennifer Cathy, President and CEO
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Purpose

The purpose of this policy is to establish clear guidelines for the development, review, approval, implementation, and maintenance of organizational policies within Delphi Rise. By ensuring transparency, consistency, and effectiveness, this policy supports informed decision making, regulatory compliance, and streamlined organizational operations.

Scope

This policy applies to all affected individuals of Delphi Rise. Affected individuals include employees, the chief executive, senior administrators, managers, contractors, agents, subcontractors, independent contractors, members of the governing body, and corporate officers whose functions relate to, or could impact, Delphi Rise's identified compliance risk areas.

Within that group, this policy specifically applies to all individuals involved directly or indirectly in drafting, reviewing, approving, maintaining, distributing, or implementing organizational policies. This includes, but is not limited to:

- Senior Leadership Team
- Compliance Officer
- Program Managers
- Administrative leaders responsible for departmental policies
- Staff responsible for documentation and internal controls
- Governance and board level reviewers

All activities under this policy must comply with all applicable federal and state laws and regulations governing operational oversight, corporate compliance, recordkeeping, documentation, and organizational governance.

Policy Development

- Policies shall be developed as needed to address key areas of organizational operations, governance, compliance, workforce management, program delivery, and conduct, as determined by Senior Leadership or the Compliance Committee.
- All policies must be created using the agency's standardized policy boilerplate template.
- Each policy shall reference applicable governing laws, regulations, payer requirements, contractual obligations, or industry standards related to its purpose and scope.
- Drafting departments must consult with the Compliance Officer when policies relate to compliance risk areas.

Policy Review and Approval

- All organizational policies shall be reviewed at least annually to ensure accuracy, relevance, and compliance with current legal and regulatory requirements.
- Organizational policies shall be reviewed by the Compliance Officer, the CEO, and appropriate members of the Senior Leadership Team.



- When applicable, policies affecting governance or fiduciary oversight shall also be reviewed by the governing body or designated board committee.
- Each policy's review and approval process must be documented in its header, including revision dates and approval signatures.
- Archived versions of prior policies must be maintained in accordance with required record retention standards.

Policy Implementation

- Once approved, policies shall be communicated to all affected individuals using appropriate distribution methods:
 - Employees: Internal shared drive or electronic communication
 - Vendors and contractors: Email or contract attachment when relevant
 - Board Members: Board packets and board portal
- Policies must be accompanied by any required Standard Operating Procedures and training to ensure clear understanding and operational compliance.
- Policy owners are responsible for ensuring that their teams understand and correctly implement policy requirements.

Policy Monitoring and Enforcement

- Compliance with policies shall be monitored on an ongoing basis through audits, supervisory review, and compliance oversight.
- Instances of non compliance shall be addressed in accordance with the organization's disciplinary policy or corrective action requirements.
- Identified policy gaps, conflicts, or risks shall be reported to the Compliance Officer or Senior Leadership for resolution.
- Feedback and suggestions for policy improvements shall be encouraged and considered for future revisions.

Policy Compliance

Organizational Senior Leadership are expected to familiarize themselves with this Policy on Policies and ensure compliance with all provisions. Non compliance may result in corrective action, up to and including termination of employment, termination of contracts, or removal from volunteer or governance roles.

Policy review

This Policy on Policies shall be reviewed annually, or sooner when required due to regulatory changes, audit findings, or operational needs, by Senior Leadership or the Compliance Committee to ensure its continued relevance and effectiveness.