From: Jennifer McWain <Jennifer.McWain@maryfreebed.com>
Sent: Friday, July 21, 2023 1:31 PM

To: Comments

Subject: [EXT]: Docket 051 comment

Good day,

Thank you for your work on the proposed changes to auditing standards relating to compliance. These efforts will truly help to modernize compliance and auditing functions to prevent illegal and unethical practices.

I would like to suggest that there are two important places in the proposed standards where the process should include inquiry of the compliance officer: AS 2405.06a.(3) and AS 2110.57.

The Department of Justice has issued substantial guidance that effective compliance programs include a compliance officer. Noting the presence of that officer and getting the perspective of that person whose job role is to be assessing and addressing compliance risks would improve the audit and make this standard stronger. Thank you for considering this suggestion.

Jennifer McWain PT, MHS, CHC

Compliance Officer & Clinical Excellence Specialist

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You may also report compliance concerns through the Anonymous Compliance Hotline: 616-840-8706

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