



## Florida Foot & Ankle Fellowship Society Compliance Program Overview

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All participating members of the Florida Foot & Ankle Fellowship Society, including but not limited to attendings, directors, site coordinators, site employees, FPMA/FPMS members and industry partners/sponsors are committed to upholding the highest standards for ethical and legal behavior. This document provides an overview of our compliance standards and practices. These standards and practices are an essential component of how we carry out our work in representation of the FFAFS.

### Written Standards and Procedures

Our Code of Conduct sets out our expectations for fellows, attendings, directors and other participating member's behavior and a framework for ethical and legal conduct. It reinforces our core values and directs employees to comply with law and policies, respect privacy, manage resources prudently, work respectfully, and report questionable behavior. We also provide all members with more detailed materials, including a comprehensive FFAFS Handbook and extensive financial policies/obligations. We maintain conflict of interest, whistleblower, document retention, and other governance policies.

### Education and Training

All participating members of the FPMS receive extensive training and documentation on compliance standards and procedures, including through a detailed orientation process and through online/webinar based or personal communication concerning privacy, harassment, and other matters. Our policy and educational documents, code of conduct and program evaluation tools are accessible through the FPMA website. We also provide all participating members with updated materials and training sessions as needed, to reflect new developments and reinforce understanding. We review, update, and supplement our materials and training programs as appropriate, including consulting with outside counsel when necessary.

### Oversight

Our Board of Directors are responsible for overseeing each participating site's compliance activities. Day-to-day operational responsibility for particular areas lies with individual staff members who report periodically to the Board of Directors, as applicable. Our Audit Committee which is essentially the same as the Board of Directors monitors activity under our whistleblower policy.

### Internal Lines of Communication

We are committed to fostering dialogue between FPMA, FPMS, FFAFS, our participating fellowship sites and corporate partners. Our goal is that all members, when seeking answers to questions or reporting potential instances of compliance violations, should know whom to turn to for a meaningful response and should be able to do so without fear of retribution. To that end, we maintain an open door policy, as well as confidentiality and whistleblower policies.



## **Florida Foot & Ankle Fellowship Society Compliance Program Overview (continued)**

### **Monitoring and Auditing**

FFAFS Board of Directors monitor, audit, and evaluate compliance with FFAFS policies and procedures. The nature of our reviews, as well as the extent and frequency of our compliance monitoring and auditing, varies according to a variety of factors, including new regulatory requirements or changes in business practices. [If we identify new and emerging risk areas, we address these risks.] In addition, in connection with the annual audit and program review we will meticulously review each site’s financial statements, proof of expenses and focus on compliance matters and regularly test various internal activities and practices.

### **Responding to Violations**

Our Fellowship Handbook includes clear disciplinary and other procedures that set out the consequences for violating legal, financial and internal requirements. Although each situation is considered on a case-by-case basis, we undertake appropriate disciplinary action to address inappropriate conduct and deter future violations. In addition, if we determine that the violation is in part due to gaps in our policies or practices, we take action to modify them to prevent further similar violations.

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*[Last updated: June 26, 2021]*