



Code of Business Conduct & Ethics

A. Overview

The Code of Business Conduct & Ethics provides Community Services for Every1 employees, agents, member of the Board of Directors, consultants, and volunteers with information necessary to adhere to the high ethical principles the agency lives by. Community Services for Every1 is accountable for compliance not only with the Code of Business Conduct & Ethics, but also with all laws and regulations applicable to our activities, and other policies and procedures prepared by our agency and oversight bodies.

B. Displaying Good Character

Good character is what this Code of Business Conduct & Ethics is all about. Honesty and Integrity defines our relationships with people receiving services, outside agencies, business partners, and each other. By maintaining the highest level of corporate integrity through open, honest, and fair dealings, we earn trust for our services and ourselves from everyone with whom we come in contact. Showing respect and empathy to all those we interact with is crucial to our mission.

C. Standards of Conduct

Community Services for Every1 representatives are expected to comply with the following standards:

1. Business Principles

a. Maintain the Confidentiality of Agency Records

The agency is responsible and accountable for the integrity and protection of its business information. All agency records and documents (in any form or media) are the sole property of the agency and thereby considered confidential by its nature, except as provided by law or regulation. All agency information (i.e. policies, procedures, strategic or business plans, administrative memos, financial document, etc.), whether in electronic or written format, is confidential and may not be released or shared with others outside the agency without proper prior authorization.

No Community Services for Every1 representative shall disclose to others any confidential information obtained during the course of employment work (paid or unpaid) or receipt of reports, which have not been published or disclosed, to the public. Documents and electronic media containing sensitive information on people receiving services, staff, consultants, volunteers, board members, and other representatives of the agency must be carefully handled and properly secured. Once an agency representative terminates the relationship with the agency, they have no right to access or use agency information.

If any Community Services for Every1 representative observes or becomes aware of a breach of this policy including misuse of confidential information, or an unauthorized or



unrecognized individual using a computer terminal in an area familiar to you, immediately contact a supervisor.

b. Cooperate and Maintain Confidentiality During an Agency Investigation

Agency representative that become aware of a situation that is in violation of agency policy, regulatory requirements, and/or law they are expected to report such violation to the appropriate agency personnel (see Reporting Suspected or Known Violation). Should an agency representative be contacted by an assigned agency investigator to provide statement regarding their knowledge of an incident or event they are expected to cooperate with the investigator by responding timely to phone calls and/or requests to meet.

The Agency has a compelling interest in protecting the integrity of all investigations, including evidence protection and ensuring that witnesses do not experience any intimidation or harassment for their participation in an investigation. In some situations, it is necessary that the Agency require strict confidentiality of all information during the course of an internal investigation and in those situations, all persons involved in the investigation should avoid disclosing information about an ongoing investigation in order to avoid:

- Harassment and intimidation of an investigation witnesses.
- Destruction of evidence.
- Fabrication of testimony.
- Attempts to cover up the event(s) that occurred.

c. Protect Agency Assets

It is the obligation of all Agency representatives to protect the assets of the Agency. Agency property, such as office supplies, office equipment, vehicles, and property may not be used for personal reasons. Computers, printers, fax machines, copiers, audiovisual equipment, bulletin boards, phones, and other agency office equipment are the property of Community Services for Every1. The use of this equipment and the information conveyed through them may be reviewed or restricted by the Agency at any time. Employees are expected to restrict the use of all Agency equipment to professionally related material and to represent the Agency in a positive manner at all times. This equipment is provided for Agency use. The use of Agency property to view or transmit sexual material, racial slurs, or any other material that could be interpreted as such will not be permitted at any time and will result in disciplinary action.

Any misuse or misappropriations of agency funds, information, equipment, facilities, or other assets may be considered criminal behavior and can bring severe employment and legal consequences. Agency funds include, but are not limited to bank accounts, credit and debit cards, and business accounts. In addition, agency property such as janitorial and office supplies are available for business needs. Removal of such supplies from agency property for personal use may also be considered criminal.



d. Maintain the Corporate Image

The agency's reputation and identity are among its most valuable assets. No one should act in a way that adversely affects the reputation or image of the agency with employees, volunteers, people receiving services or with the community at large.

Recognizing the accomplishments of others, both internally and externally, shows appreciation for the value another person brings toward achieving our common goals.

Each agency representative should endeavor to deal fairly with the people receiving services, consultants, suppliers, competitors, and other employees. No one should take advantage of anyone else through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or other unfair-dealing practice.

While the agency cannot control what its representatives do during non-working hours, it is important to understand that information posted online may be public and comments made about the agency or agency representatives that are discriminatory or violate agency policy (i.e. confidentially, conflict of interest, harassment) can result in disciplinary action, no matter whether the employee wrote it from work or outside of work.

e. Have Job Accountability

Each agency representative is responsible for adhering to agency policy and for knowing and executing the responsibilities of his or her job independently. This means the individual is held accountable for the quality of the work he or she produces. Each agency representative should be timely in their attendance and value the deadlines and schedule of others. In addition, management is responsible for ensuring that they have provided their employees with the necessary information to do their jobs.

Each agency representative shall display teamwork by assisting and being a resource to others. This includes communicating information, clearly and consistently, to all necessary parties and being open to constructive feedback. Positively resolving conflicts and effective problem solving are important traits in being a contributing part of the Community Services for Every1 Team. Planning and prioritizing of workload are important attributes of an agency representative.

f. Avoid Conflicts of Interests

Each agency representative has a primary business responsibility to the agency and is expected to avoid any activity that may interfere or have the appearance of interfering with their performance. A conflict of interest exists if an agency representative's outside business or other interests may affect adversely, or have the potential to affect adversely, his or her motivation, objectivity, loyalty, or performance. In addition, a potential conflict of interest occurs when an individual's personal or private interests might lead an independent observer to reasonably question whether the individual's professional actions or decisions are influenced by significant personal interest, financial or otherwise.



Agency Representatives shall not participate in the selection, award, or administration of a contract supported by Federal, State or other government funds if a real or apparent conflict of interest would be involved. Such a conflict would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or when the agency employs or is about to employ any of the parties indicated herein, has a financial or other interest in the firm selected for an award.

Some additional situations in which agency representatives might encounter that would be considered a conflict of interests are:

- Having a relationship with a person receiving services outside of the workplace and/or employment by a person receiving services and/or the family member of a person receiving services;
- Directly supervising a family member as a contractor, supplier or employee of the agency;
- Romantic relationships between a supervisor and a subordinate. Supervisor is defined as “a person who has authority, direct or indirect, over another by virtue of their job classification. Subordinate is defined as “a person who is answerable to another person based on their job classification.” While the supervisor is ultimately held responsible for ensuring that this type of relationship does not occur, it does not absolve the subordinate of any wrongdoing.
- Using agency assets, including agency time, name, information equipment or facilities, for personal use without prior permission;
- Misuse of information obtained by an agency representative during the course of his or her employment;
- Soliciting personal cash or non-cash gifts of any amount or value from any person or business that has a relationship with the Agency;
- Accepting personal cash gifts of any amount from any person or business that has a relationship with the Agency;
- Financial transactions between people receiving services and/or their family members/responsibility parties;
- Outside employment that interferes with the employees job responsibilities and/or is in conflict with agency interests.
- Use of information created by or for the agency for personal gain or use by others outside the agency without prior permission.
- Working directly with someone that you have personal relationships with, whether due to a family connection or not, that interferes with work productivity and/or service delivery.

Certain agency representatives, as identified in the agency “Conflict of Interest Policy & Procedure, are required to complete the Agency “Conflict of Interest Disclosure/Confidentiality Agreement” form upon the beginning of the relationship with the agency and annually thereafter.



The above situations identified as “conflicts of interests” are not all inclusive. Agency representatives are expected to exercise good judgment and be mindful of how their personal relationships and outside activities may be affecting the workplace. Agency representatives may also find themselves in a situation where they do not feel like they can be objective in their decision making due to their personal relationship or beliefs. Should an agency representative feel that they are not able to be objective in making a business related decision they should voluntarily abstain/refrain from participating in the decision making process. Furthermore, if any matter exists that might be a conflict of interest or creates the appearance of a conflict of interest, agency representatives are required to consult their supervisor, Corporate Compliance Officer or Human Resources Representative to assess whether a problem exists.

g. **f. Display Caution when Offered Gratuities**

In the course of performing their jobs, agency representatives may be offered gratuities, which usually are intended as gestures of goodwill or appreciation. These include gifts, entertainment, gift cards, meals and beverages, tickets to sporting or cultural events, services or other similar favors. Agency representatives may not accept, individually or as part of a group, anything that could reasonably be thought to have more than a nominal intrinsic value (nominal intrinsic value: e.g. promotional or advertising pens, pencils, notepads, calendars, greeting cards, trinkets, baked goods or other similar gifts of limited value).

Gifts, gratuities, or attendance at events exceeding nominal intrinsic, typically greater than \$25.00, should be refused or returned unless the Corporate Compliance Officer approves of acceptance as part of a business need or special occasion i.e. holiday gift basket during holidays to be shared amongst representatives.

Even nominal gifts can be inappropriate if used in a way which creates the impression that a certain vendor or person is receiving or attempting to obtain preferential treatment, therefore the acceptance of any gift, regardless of its value, must be done so with caution and when in doubt needs be reported to a supervisor in order to determine whether the gift may or may not be accepted to avoid a conflict of interest.

Acceptance or participation in a business meal situation is appropriate when based on a business need and such dining occurs in conjunction with business discussions.

These guidelines cannot cover every situation that may arise; employees should discuss with their supervisor or Corporate Compliance Officer any situation involving gratuities they are uncertain about.

h. Adhere to the Agency Media Communication Policy

It is the agency’s policy to provide open, accurate, and consistent communication with the public. To maintain this policy and to protect the privacy of the individuals that we serve, designated Agency spokespersons are responsible for releasing information at the appropriate time to Media agencies and for guarding against the inadvertent disclosure of confidential information. All inquiries regarding the Media Communication Policy should be



directed to the Communications & Fundraising Coordinator, Vice President of Program Support and Development or President & CEO.

Social network sites, including, but not limited to Facebook, Snapchat, Twitter, Instagram, LinkedIn, also fall under the umbrella of “media.” It is important that all Agency representatives who identify themselves on these sites as having an affiliation with Community Services for Every1 do not give readers the impression that their comments represent Agency opinion. If you are not a designated spokesperson for the Agency then any comments you make about agency activities on these sites could, depending on the content, be a violation of the Agency Media and Confidentiality Policy.

2. Quality of Care

a. **Adhere to Individual’s Rights and Responsibilities**

By regulation, all individuals receiving services are entitled to certain Rights and Responsibilities. It is expected that all agency representatives adhere to the provisions set forth in these regulations. In particular, agency representatives shall not engage in any activities that constitute abuse of persons receiving services as defined in the regulations of the Commissioner of OPWDD. Failure to exercise one’s duty to intercede or to report any activity, which may be considered abuse, will constitute abuse.

b. **Follow Individual’s Service Plan**

Agency employees are expected to comply with each person’s service plan and communicate any changes in the plan to the necessary parties in accordance with regulatory requirements and program policies and procedures.

It is not acceptable for people receiving services to carry out the duties of employees unless such tasks are described in their plan of services by their program planning team and for increasing their skills.

c. **Maintain Appropriate Interactions with Individuals**

Agency representatives must treat people receiving services with dignity and respect and are expected to maintain professional relationships with people receiving services at all times. It is expected that agency representative will treat people receiving services with respect and dignity at all times.

There shall be no personal financial transactions between agency representatives and people receiving services or their family/responsible party. Financial transactions, which may be construed as exploitation or result in greater benefit to the agency representative than the person receiving services will be considered abuse.

The receipt of any personal gift by any agency representative from any person receiving services or their family member/responsible party is discouraged and needs to be avoided. Depending on the circumstances, a gift of nominal value may be allowed. An example of such a gift might be bake goods or a dollar store trinket. Any gift must be disclosed to the supervisor to determine whether the gift may or may not be accepted to avoid a conflict of interest.



Agency representatives may not accept cash gifts from individuals receiving services under any circumstances. However, cash donations from a family member/responsible party to the agency may be accepted. Should a family member/responsible party be interested in donating to the agency they should contact the Public Relations Coordinator.

All agency representatives are expected to maintain a professional demeanor with people receiving services. It is also expected that agency representatives shall model appropriate and acceptable behavior while in the presence of people receiving services.

d. Safeguard Individuals Privacy

Agency representatives shall treat all clinical, program information as confidential, and utilize such information in a professional manner at all times. Access to information on people receiving services must be limited to the extent permitted by the agency policies and procedure pursuant to state and federal law. In addition, release of information pertaining to HIV/AIDs is subject to additional regulatory requirements and should not be released without the proper authorization to do so. Any Community Services for Every1 representative who engages in unauthorized disclosure, access to, or misuse of information in violation of the privacy rights of people receiving services, or others may be subject to disciplinary action in addition to civil or criminal sanctions. Any Community Services for Every1 representative who becomes aware of such unauthorized disclosure should immediately report this to their supervisor or Corporate Compliance Officer.

3. Medical Practices

a. Follow Regulations Regarding Control of Medications

It is the agency policy that all Community Services for Every1 representatives shall be diligent in discharging their obligations regarding prescription drugs and controlled substances in accordance with applicable laws, regulations and agency policies and procedures.

The agency is legally responsible for the proper distribution, handling of and prevention of unauthorized access to pharmaceutical products. The diversion of any prescription drug or controlled substance, including a drug sample, in any amount for any reason to an unauthorized individual or entity is forbidden.

Community Services for Every1 representatives may not use drugs stored in agency programs intended for the use of people receiving services.

4. Legal Obligations & Compliance

a. To Maintain a Safe and Healthful Workplace

The agency has a commitment to maintain a safe and healthful workplace for agency representatives and people receiving services. As part of this commitment, the agency maintains reasonable safety rules, practices, and procedures for all agency representatives.



At the same time, the agency expects agency representatives to be efficient and productive in performing their job assignments

The agency provides a safe and healthy work environment by adhering to the laws, regulations, and commonly accepted safe practices in accordance with federal and state laws regarding occupational and environmental safety.

Laws and policies regarding hazardous materials, pollutants, and medical waste must be strictly followed by all Community Services for Every1 representatives.

b. Refrain from Misrepresentation

Honesty based on clear communication is the cornerstone of ethical disclosure of information. The agency and Community Services for Every1 representatives shall be honest and make no representation or dishonest statements in conducting agency business affairs. Community Services for Every1 representatives must report and record all information accurately and honestly including all marketing materials, service records, requests for payment, timesheets, financial reports, and other similar documents, which relate to business activities. Marketing materials will accurately reflect certification, licensure, and services available.

In addition, Community Services for Every1 representatives must not make false statements with respect to the conditions or operations of any program nor make false statements with respect to information regarding ownership and control of a facility or program.

c. Refrain from Engaging in Unfair Trade Practices

All agency representatives are expected to comply with all laws pertaining to the restraint of trade and fair competition. Such laws generally forbid any kind of understanding or agreement (written or verbal) between competitors to fix and control fees or payments for services or products, or to engage in any other conduct that results in restraints of competition.

Unfair methods of competition and deceptive acts or practices are also prohibited. Examples of these include false or deceptive statements or comparisons about the agencies services or falsely disparaging competitor's services without data to substantiate it.

d. Adhere to Tax-Exempt Requirements

The Agency is a tax-exempt entity under the rules and laws of New York State and the Federal Internal Revenue Service. In order to comply with applicable law, the Agency must operate for the benefit of the community and avoid "private inurement" or "private benefit" as defined by these laws. Criminal penalties may be exercised if a violation of these tax laws is found and substantiated. In this regard, Community Services for Every1 representatives shall be familiar with these restrictions:



- The agency sales tax exemption is used only for legitimate agency business and service transactions.
- Personal items cannot be purchased through the agency even if reimbursement is offered.
- All appropriate withholding taxes must be applied to staff wages.
- Tax-exempt bonds are used to secure mortgages for agency properties where applicable. All restrictions on the use of property governed by the bonding authority shall be followed. Services and programs associated with bonds will be properly discharged. Violation of the condition related to bonds may affect future borrowing by the agency and/or the bonding authority.

e. Comply with Fundraising Standards

The agency adheres to acceptable fundraising standards. Only fundraising activities that benefit the agency and the programs or services are allowed, and must be specifically authorized by the President & CEO or designee. Fundraising events must be consistent with the mission, vision, goals, mandates, and values of the agency.

Any Community Services for Every1 representative that obtains funds because of fundraising activities on behalf of the agency must promptly deposit the funds with the Business Office for appropriate record keeping and cash controls. A receipt for funds deposited must be obtained from the appropriate Business Office Personnel.

Fundraising reports are issued regularly and comply with applicable laws and regulations associated with the agency licenses and not-for-profit law.

f. Submit Accurate Billings and Financial Reports

Billing activities are to be performed in a manner consistent with Medicaid and other payers' regulations and requirements. The agency will comply with all pertinent regulations in billing practices, including, but not limited to, specific program requirements, need for service, procedure codes, bad debt reporting, credit balances, and duplicate billing.

All billing and claims generated must accurately reflect that services rendered are supported by relevant documentation and are submitted in compliance with applicable laws, rules, regulations, and program requirements. Agency representatives should never knowingly make or present improper, false, fictitious, or fraudulent claims to any government or private health care program, employee, department or agency. Improper activity can include, but is not limited to:

- Misrepresentation of Services
- Duplicate Billing
- Multiple Coverage and Secondary-Payroll Fraud
- False Claims Statements



➤ Falsifying Dates on a Claim

Those responsible for completing and submitting financial reports will do so in accordance with acceptable accounting practices and legal obligations. Improper accounting practices include, but are not limited to:

- Supplying false or misleading information in the Agency's financials or other public documents, including its annual information return; or
- Providing false information to, or withholding material information from, the Agency's auditors.

It is a crime to submit a "False Claim." A False Claim occurs when a person or organization submits a record or claim for payment of services, property, or other items to the government, knowing that the information is not true. "Knowing," means that the person or organization:

- knows the record or claim is false, or
- is asking for payment and is deliberately ignoring whether or not the record or claim is false, or
- is asking for payment and does not care if the record or claim is false.

The Federal Government enacted the False Claims Act law that allows a person who knows that an organization has filed a False Claim for payment to file a lawsuit in Federal Court on behalf of the government, and, in some cases, the person can receive a portion of the damages awarded. Similar to the Federal Law described above, the New York False Claims Act and the Program Fraud Civil Remedies Act prohibits a person or entity from "knowingly" presenting or causing to be presented a false or fraudulent claim for payment or approval to any employee, officer, or agent of the state or local government. There are additional civil, administrative, and criminal laws that apply to the submission of a false claim. Additional information on these laws is available in the Employee Personnel Policy and Procedure Manual, by contacting the Corporate Compliance Officer, or you can visit the Office of the Medicaid Inspector General's website at www.omig.state.ny.us.

g. Refrain From Accepting Kickbacks

The term "kickback" is defined as the giving of remuneration of any kind, which is interpreted under the law as "anything of value". In the United States, it is illegal to provide, offer, or accept a kickback or bribe. A kickback or bribe may be defined as any money, fee, commission, credit, gift, and gratuity, anything of value or compensation of any kind that is provided directly or indirectly, and that has as one of its purposes, the improper obtaining, or rewarding or favorable treatment in a business transaction.



No agency representative or other agency representative shall solicit, receive, offer to pay, or pay remuneration of any kind in return for referring an individual for items or services, or purchasing, leasing, ordering or arranging for goods, facilities, services or items for which payment may be made under federal, state, or local health care programs.

All Community Services for Every1 representatives should avoid the offering or receipt of a gift in circumstances where it could appear that the purpose of the gift is to influence the agency's relationship with a vendor, regulator or other person or entity. The receipt of any gift by any agency representative from a vendor, contractor, etc... must be disclosed to the supervisor to determine whether the gift may or may not be accepted to avoid a conflict of interest.

h. Follow Research Grant Standards

Research grant proposals involving people that the agency serves are subject to the provisions or applicable state and federal laws and regulations. Researchers must be vigilant in considering whether grants involve improper inducements for referrals. Research, which encourages or results in improper referral practices, could constitute "kickback" in violation of federal and state law.

i. Be Familiar with Regulations Governing Areas of Responsibility

It is expected that all agency representatives adhere to the rules and regulations set forth by New York State and the Federal Government and comply with any contractual obligations the agency may have. In addition, Community Services for Every1 representatives shall:

- Be familiar with program regulations governing areas of responsibility, receive and understand new regulations and/or expectations and to inform the supervisor or appropriate agency administrator of any possible issues of non-compliance.
- Insure that a Certificate of Need, or similar documentation, is properly submitted to the respective licensing organization, as required, to establish and /or change service provisions.
- Insure that questions of training and compliance with the submission of a Certificate of Need or the application of regulations should be referred to the respective supervisor and/or administrator.

5. Human Resources Principles & Community Involvement

a. Comply with Labor & Employment Laws

The agency fully complies with all applicable labor laws and statues regarding employee-employee relationships and workplace environment.

The agency employs only persons who are legally authorized to work in the United States consistent with federal laws. Individuals who are perspective candidates and who U.S. citizens



are or who possess a “green card” or work visa are entitled to be hired. The appropriate documentation of citizenship status must be presented to the Human Resources Department at the time of hire.

b. Comply with Payroll Deductions

The agency fully complies with the salary basis requirements of the Fair Labor Standards Act (FLSA). Therefore, the agency prohibits all company Management Staff as well as the Payroll Office from making improper deductions from the salaries of employees.

If an employee believes that an improper deduction has been made to their salary, that employee should immediately report this information to their direct supervisor, or to the Human Resources Coordinator.

Reports of improper deductions will be promptly investigated. If it is determined that an improper deduction has occurred, the employee will be promptly reimbursed for any improper deductions.

c. Embrace Diversity

The agency respects and welcomes diversity in its employees, people receiving services, contractors, and other representatives.

There shall be no discrimination activity against any person for any reason, including race, religion, national origin, creed, age, gender, ethnic background, sexual orientation, or disability except where a bona fide occupation qualification is involved.

The agency is committed to equal employment opportunity.

d. Display Ethical Personal Conduct

Ethical personal conduct on the job means treating oneself and others with respect and fairness. Employees are expected to conduct themselves professionally and appropriately in interactions with individuals served, co-workers, family members, management staff, and any external visitors or guest to their worksite. All employees should refrain in such a way that could be considered discriminatory, harassing, or degrading to others.

Workplace harassment includes both sexual harassment and harassment in a more general nature. Sexual harassment includes both quid pro quo and hostile work environment scenarios. Other forms of harassment include unwelcome or unwanted attention or discrimination conduct based on an individual’s race, color, creed, religion, national origin, gender, sexual preference, marital status, age, and/or disability. Examples of harassment include, but are not limited to inappropriate jokes, offensive body language such as finger pointing, or offensive materials such as sexually explicit pictures. It can include verbal, nonverbal, or physical abuse. Something considered harmless by one individual may be perceived as harassment by another. The agency expects all agency representatives to conduct themselves in a manner appropriate to the workplace and to keep all work environments free of harassment.



e. To Maintain Agency Representative Privacy

Every agency representative has the right to confidentiality of certain employment records as well as the privacy of personal activities outside of business hours. In turn, the agency has rights of access to all agency property and communication, records and information created in the business setting. By using agency property and/or creating such records and information, the agency representative consents to such access.

The agency will not release information regarding our current agency representatives without written consent unless it is required by a program survey, subpoena, or public record. An internal investigation may at times require the review and /or release of certain personnel information to agency personnel, law enforcement, and/or oversight bodies.

The agency emphasizes the need for balance between work, personal and family life, and encourages agency representatives to pursue interests and activities outside the workplace. Personal interests and beliefs, however, must not be imposed on other agency representatives or people receiving services. The agency recognizes the agency representative's rights to become involved in political activities of their choice. However, activities should not interfere with the agency representative's ability to perform their job and should not imply participation on the part of the agency.

f. Refrain from Substance Abuse and Unsafe Workplace Behavior

In order to provide a safe and healthful workplace for agency representatives and people receiving services and to promote an efficient and productive workforce Community Services for Every1 representatives are prohibited from:

- Manufacturing, selling, purchasing, transferring, using or possessing illegal drugs, narcotics, or other unlawful substances or materials on the agency premises, or while conducting business for the agency;
- Manufacturing, selling, purchasing, transferring, using or possessing on the agency's premises, substance or materials not authorized by the agency (such as firearms, weapons, intoxicating beverages, drug paraphernalia, or medically authorized drugs used improperly or unsafely). However, the consumption of alcohol on special occasions shall be permitted with the prior written permission of the President & CEO;
- Reporting to the workplace or working if their ability to perform their job is impaired by the use of alcohol, a controlled substance, an illegal substance, or prescribed medication.

Agency representatives are subject to random and for cause drug tests at any time. Upon notification of either of these tests, the person will be asked to take a test immediately. Failure to do so will result in immediate termination.



Code of Business Conduct & Ethics Reporting & Adherence Agreement

Reporting Violations/Whistleblower Protection

All Community Services for Every1 representatives have a responsibility to report in a timely fashion any violations of the Agency's Code of Business Conduct & Ethics.

The agency has established a "Corporate Compliance Hotline." This reporting system provides agency representative the ability to report potential Process Improvement violations 24 hours a day. The "Corporate Compliance Hotline" is accessed by calling 883-8888 Mailbox 707 and is a direct line to the Corporate Compliance Officer. The V.P. of Program Support & Development is identified as the Corporate Compliance Officer. Anonymous calls are accepted; however, representatives are encouraged to leave detailed information. The "Corporate Compliance Hotline" may also be accessed for callers to pose questions regarding any compliance issues. Should the caller leave their name and number the Corporate Compliance Officer will respond to any questions within 10 business days or less. Agency representative can also contact the Corporate Compliance Officer (V.P. of Program Support & Development) directly at 883-8888 box 143 or forwarding a written message to the Corporate Compliance Officer or by emailing compliance@csevery1.net.

Agency representatives will not be subject to reprisals for reporting or supplying information about potential violations, except in cases where those agency representatives are responsible for the violation or when deliberate false reporting has occurred. Agency representatives are also protected under this provision and the False Claims Act laws against any form of retaliation for filing a False Claim lawsuit. Additional information on these laws is available in the Employee Personnel Policy and Procedure Manual, by contacting the Corporate Compliance Officer, or you can visit the Office of the Medicaid Inspector General's website at www.omig.state.ny.us.

Any agency representative who retaliates or harasses someone who has reported a violation in good faith is subject to disciplinary action up to and including termination of employment. New York Labor Laws also protect employees from retaliatory practices. Additional details on these laws may be obtained by contacting a Human Resources Representative, the Corporate Compliance Officer, or visiting the New York State Department of Labor website at <https://www.labor.ny.gov/home/>.

Adherence

The entire Corporate Compliance Plan is available on the agency website at www.csevery1.com or can be obtained by contacting a supervisor or the Corporate Compliance Officer.