



Compliance Code of Conduct

Vision: “Doing the Right Things and Doing Them Right”

Mission:

CP Rochester exists to support people with physical and developmental disabilities in choosing and accomplishing successive individualized life goals. We do this by providing a wide range of services to people of all ages in the greater Rochester area. These services include: Outpatient Clinical, Residential, Educational, and Personal Support Services. Our purpose is to ensure that those we serve safely determine their own pathway in life and live as full members of their community.

Values:

This agency exists to serve others, and does so through the expression of these core values:

Respect: To recognize the dignity of every person.

Integrity: To be honest, fair, and trustworthy.

Stewardship: To manage resources responsibly.

Excellence: To work at the highest level of performance, with a commitment to continuous improvement.



Compliance Code of Conduct

Responsibilities of Each Individual Associated with CP Rochester as a Board Member, Employee, Contractor, Agent, Student Trainee or Volunteer

The effectiveness of this plan depends upon each individual's willingness to:

- ❖ Actively promote the CP Rochester vision, mission and operating principles.
- ❖ Read, understand, and follow the Corporate Compliance Code of Conduct.
- ❖ Think honestly and ethically.
- ❖ As an Agent of the organization, act responsibly and sensitively. Obey all applicable legal and regulatory requirements as well as CP Rochester policies and procedures.
- ❖ Actively participate in training.
- ❖ Respect the rights of CP Rochester consumers, families, and staff.
- ❖ Maintain confidentiality.
- ❖ Report suspected violations of the law and the CP Rochester's Compliance Code of Conduct.

If you suspect our code is not being honored:

- ❖ Stop, Think and Clarify and
- ❖ Report your concerns to your supervisor, or
- ❖ Call the Corporate Compliance Director, or
- ❖ Call the confidential Compliance Help Line or for any compliance related inquiries:
Call the Corporate Compliance Director (585-334-6000 ext. 353)

Violations:

Individuals who have been determined (under the Enforcement and Discipline section of the Corporate Compliance Plan) to have violated CP Rochester's Code of Conduct will be subject to disciplinary action, up to and including suspension and/or termination of employment, termination of any contract with the Agency, or termination of any other relationship with the Agency, as well as, potential criminal referral or other legal action.



Compliance Code of Conduct

Commitments:

1. Deliver Quality Services:

- ❖ As employees, contractors, volunteers, student trainees and agents of CP Rochester, we shall respect a consumer's rights and dignity and will treat him or her with consideration, courtesy, and respect and ensure that care is provided in the most appropriate setting that is necessary and verifiable.
- ❖ Our job is to maintain CP Rochester's integrity and reputation.
- ❖ We shall only employ or work with persons with proper credentials, experience, and expertise.
- ❖ Employees, contractors, volunteers, student trainees and agents are expected to provide the agency with documentation of their credentials and experience.
- ❖ We will ensure that consumers have the right to choose their own pathways in life and service providers. This includes the choice of health care providers.
- ❖ We will ensure that consumers have the right to all information that will assist them in making informed choices in any area of their life. This includes information about CP Rochester, particularly the agency policies, procedures, services and service providers.
- ❖ We will not ignore a deficiency or error. All reported or discovered issue will be brought to the attention of those who can properly assess and resolve it. Proper internal controls will be maintained to assure security and accountability.
- ❖ As employees, contractors, volunteers, student trainees and agents of CP Rochester, we will receive clear instructions from our supervisors about what is expected of us.
- ❖ Our highest priority is the health and safety of the consumers and those individuals providing services to CP Rochester. We shall strive to do our jobs so that no harm is caused to the consumers, the public or to ourselves.
- ❖ Advertising and marketing practices will be conducted in a professional manner consistent with the mission of the agency and with honesty, integrity and accountability.

2. Obey the law

- ❖ We are committed to full compliance with the local, state and federal laws, rules and regulations that apply to our agency, including all Health Care Programs (including, but not limited to Medicare, Medicaid, State Agencies and Third Party Payors) requirements.
- ❖ All business transactions will be in compliance with applicable local, state, and federal regulations and laws.



Compliance Code of Conduct

- ❖ Claims are submitted for services that CP Rochester has reason to believe are reasonable and necessary, were appropriately authorized, were provided by qualified persons and where documentation of the service exists.
CP Rochester will never knowingly submit fraudulent or fictitious claims. Documentation to support billing claims shall be maintained in accordance with the Office of Inspector General's, our licensing agency's and regulator's and the relevant payor's current standards and guidelines. If there is any concern regarding the adequacy of documentation maintained by CP Rochester, the matter should be brought to the attention of the Corporate Compliance Director prior to billing where possible or if uncovered after billing as soon as possible.
 - ❖ All of the members of our volunteer Board of Directors, executive administrators, directors, managers, supervisors, employees, members of the Corporate Compliance Committee, vendors, consultants, contractors, volunteers, student trainees and other agents shall comply with our policies and procedures, with the requirements of the Corporate Compliance Plan and with all Health Care program requirements.
 - ❖ We cooperate with and support our Code of Conduct by committing the necessary resources to ensure compliance:
 - Corporate Compliance training shall occur pursuant to the Employee Training Policy.
 - We report suspected wrongdoing as set forth herein and cooperate with corporate compliance investigations.
 - We know internal corrective action will be taken if we do not follow laws and that unlawful activities **must** be reported.
 - We know everyone is responsible for making sure we observe high standards of ethical behavior.
 - All employees, contractors, volunteers, student trainees and agents have a duty to report suspected misconduct, anonymously if they choose, and without fear of retaliation.
- 3. Observe all applicable business laws**
- ❖ All applicable business laws, including, but not limited to, labor laws, tax codes, anti-trust laws and statutes, copyright laws, environmental laws, and individual rights will be abided by.
 - ❖ As a not-for-profit agency, CP Rochester will conduct business in compliance with all Internal Revenue Service regulations applicable to tax-exempt organizations.
 - ❖ CP Rochester does not share price or wage information with competitors.



Compliance Code of Conduct

4. Obey laws relating to government and donor contacts

- ❖ We conduct all political activities and contacts with government officials according to the law and requirements of a non-profit, tax exempt entity. Political fundraising is not permitted. Lobbying activities by individuals acting in their official roles representing the Agency will be in accordance with the NFP Law and other relevant New York State laws.

5. Avoid conflicts of interest

The appearance of a conflict of interest and/or actual conflicts shall be avoided by disclosing pertinent facts and exercising the best care and judgment for CP Rochester, not for personal benefit or for the benefit of others at CP Rochester's expense (i.e. Refer to attached "Outside Employment" policy).

6. Conduct Fair and Ethical Business Practices

- ❖ Carefully negotiate and bid contracts - arm's length and fair market value.
- ❖ All communications, statements and representations to suppliers, vendors, contractors or collaborative partners will be accurate, truthful, fair and uniform without bias or favoritism.

7. Neither give nor receive any illegal gifts, favors, or kickbacks

No person associated with the organization shall accept bribes, gifts or gratuities intended to persuade business decisions, referrals, solicit an unfair advantage, or reward special attention or service. Loans to or from any individual or business (other than recognized financial institutions) that furnish supplies or services are prohibited. Any contributions or donations to CP Rochester will be obtained without coercion, force, or expectation of compensation in return.

8. Work safely

All employees, contractors, volunteers, student trainees, and agents shall follow standard precautions in caring for and supporting people who receive services and for helping others to do so. We will maintain a drug-free workplace. We will work to report and correct any environmental or safety hazards or concerns promptly and follow posted warnings and regulations.



Compliance Code of Conduct

9. Promote a positive work environment

We are courteous and respectful to all. Harassment or discrimination of any kind is totally unacceptable and shall be reported. This includes discrimination based on race, color, religion, gender, age, national origin, disability, sexual orientation, citizenship, veteran status or marital status. All workplace environments will be free from harassment, disruptive behavior and violence.

10. Maintain confidentiality of consumer and employee, contractors, volunteers, student trainee information and records

The inappropriate release of consumer information may be harmful to the consumer and the Agency.

- ❖ CP Rochester shall comply with the Health Insurance Portability and Accountability Act of 1996 and the regulations promulgated there under.
- ❖ All persons associated with CP Rochester shall respect the confidential nature of consumer and organization information and shall not disclose or discuss issues of a confidential nature inappropriately.
- ❖ Confidentiality regarding consumers, personnel and business information will be maintained in accordance with the acceptable standards of information sharing as prescribed by regulatory bodies and the policies and procedures of CP Rochester.

11. Fiscal Responsibility

- ❖ The community has entrusted us with assets to be used and protected for our consumer's health and well-being. We safeguard, invest and use these assets to achieve our mission. Proper use of CP Rochester's property and equipment is everyone's responsibility.
- ❖ Personal use of CP Rochester's assets is not allowed. All persons associated with CP Rochester will use CP Rochester property, including, but not limited to, facilities, supplies, information systems, software, furnishings and vehicles, for CP Rochester business purposes only.
- ❖ We will not misappropriate CP Rochester's property or proprietary information. In addition, we avoid waste and try to find ways to reduce costs without jeopardizing quality.
- ❖ We are committed to obeying software and copyright licenses and laws.



Compliance Code of Conduct

- ❖ The amount of service billed by CP Rochester is consistent with the amount and type of service provided. Claims are only submitted for services that CP Rochester believes are reasonable and necessary. Documentation to support billing claims shall be maintained in accordance with the Office of Inspector General's, our licensing agency's and regulator's and the relevant payor's current standards and guidelines. If there is any concern regarding the adequacy of documentation maintained by CP Rochester, the matter should be brought to the attention of the Corporate Compliance Director prior to billing where possible or if uncovered after billing, as soon as possible. No claim for payment or reimbursement of any kind that is false, fraudulent, inaccurate or fictitious may be submitted.
- ❖ No falsification of service, time or other records that are used as the basis of submitting claims will be tolerated. All reports or other information required to be provided to any federal, state, or local government agency shall be accurate, complete, and filed on time.
- ❖ Accurate and complete cost reports, financial records and all statements specific to the agency's assets, liabilities, revenue and expenditures will be maintained according to Generally Accepted Accounting Principles.

12. Report Suspected Wrongful Conduct as Soon as Possible

Suspected wrongful conduct, including suspected violations of any Health Care Program requirements or of our own policies and procedures, shall be reported either by directly reporting such violations to the Corporate Compliance Director (CCD) or by calling the Compliance Help Line. The Compliance Help Line can be used anonymously to disclose suspected misconduct to our CCD. All reports will be kept confidential, to the extent possible and investigated if necessary. All relevant information will be obtained from the disclosing individual, and others, and proper follow-up conducted. The CCD shall maintain a confidential disclosure log, which shall include a record and summary of each disclosure received, the state of the respective internal reviews, a summary of findings and any corrective action taken in response to the internal reviews.

CP Rochester will not tolerate any threat of, or actual retribution / retaliation for making a good faith report of suspected wrongful conduct. CP Rochester has a strict policy of non-intimidation and non-retaliation for good faith participation in its Compliance Program, including but not limited to reporting potential issues, providing assistance in investigating potential issues, participating in agency self-evaluations and audits and other protected reporting of potential compliance issues.



Compliance Code of Conduct

13. Disciplinary procedures for abuse of CP Rochester's Corporate Compliance Program and Code of Conduct standards will follow the guidelines under existing personnel and other relevant policies and may result in immediate discharge. Disciplinary measures shall be determined on a case-by-case basis with advice from outside counsel, as needed. Disciplinary measures and procedures may involve consideration and direction from outside third parties (i.e. governmental agency, law enforcement) including fines, reimbursement of funds, criminal prosecution and imprisonment.