

Code of Conduct

Expectations

These standards were written to explain how our Affected Individuals should act toward individuals receiving services, toward each other, and toward others performing their duties on behalf of the Agency. Adherence to the Code of Conduct is a condition of employment and business association with Wraparound Services of the Hudson Valley.

Wraparound Services of the Hudson Valley is committed to the quality of life and the personal outcomes of those individuals who are served by our programs. Everyone who provides services to our program participants must be committed to doing his or her best when performing any Agency-related duty. The success of our Agency is dependent on the trust and confidence we earn from the individuals that we serve, their families and representatives, and the community in which we provide our services. We gain credibility by adhering to our commitments, displaying honesty and integrity, and by living up to our Agency's mission and vision.

It is our expectation that every person who provides services adhere to the highest standards and promote ethical behavior. Person centered planning through outcome measures represent the foundation of our Agency's philosophy and practice. It is everyone's responsibility to ensure a safe and healthy environment where we can fully accomplish our Agency's mission and vision.

Employees, volunteers and others associated with the Agency must exhibit and promote integrity, team-work, trust and respect in the workplace; and must also comply with Agency policies prohibiting discrimination, retaliation and harassment in all facets of the Agency's operations. Wraparound Services of the Hudson Valley is committed to creating a workplace where employees, volunteers and others associated with the Agency are treated with respect and without regard to any characteristic protected by law. Business integrity, teamwork, trust, and respect are important Agency values. Unlawful discrimination or harassment of any sort violates these values.

Affected Individuals must have an understanding of the Agency's policies and procedures, applicable regulations, and federal and state laws that apply to their specific roles. Although the Agency's Code of Conduct cannot address every issue or provide answers to every dilemma, it defines the spirit in which we intend to do business and should guide us in our daily conduct. There may be instances that are not addressed by the Code of Conduct. Affected Individuals must seek direction from Agency Administrators in these situations.

Affected Individuals may not engage in any conduct that conflicts with or is perceived to conflict with the best interest of the Agency and the individuals that it serves. Employees must disclose any circumstances where the employee or his or her immediate family member is an employee, consultant, owner, contractor or investor in any entity that (i) engages in any business or maintains any relationship with the Agency; (ii) provides to, or receives from, Agency any individual referrals; or (iii) competes with the Agency. Employees may not, without permission of the Corporate Compliance Officer, accept, solicit or offer anything of value from anyone doing business with the Agency.

Employees, volunteers and others who perform billing and/or coding of claims must take every reasonable precaution to ensure that their work is accurate, timely, and in compliance with applicable regulations, federal and state laws, and agency policies. In accordance with the Federal and State False Claims Acts, it can be considered a crime to knowingly and willfully provide false information or omit information when billing for Medicaid services. Under the New York State Medicaid Program, submitting or causing a false claim to be submitted is an unacceptable practice, which can lead to fines and exclusion from the Medicaid Program. Wraparound Services of the Hudson Valley maintains complete and thorough service and billings records, and only bills for services which are documented in the individuals' records. Agency created records will be retained and disposed of in compliance with the Agency's Record Retention and Destruction Policy.

During the course of employment or business association with Wraparound Services of the Hudson Valley, Affected Individuals may be exposed to a great deal of highly confidential information about the individuals that we serve (sometimes referred to as "Protected Health Information"), business operations and other employees. No information relating to the individuals that we serve, the Agency's business operations, or employees is to be discussed or shared with persons outside or within the Agency, except where appropriate given the person's role with the Agency or legal requirement to share the information. Conversations within the Agency relating to all Agency confidential information are limited to only those who need to know the information to perform the individual's job functions. It is everyone's responsibility to adhere to Agency policies and procedures that provide guidance on safeguarding confidential information. Agency policies and procedures provide guidance on telephone use, computer security, electronic communications, computer access, social media (Facebook, Twitter, etc.) and the use of the Agency's internet.

Agency resources including time, equipment, supplies and information are only to be used for Agency purposes. Affected Individuals are entrusted to use good judgment to conserve the Agency's resources.

We all benefit tremendously when employees, volunteers and others associated with the Agency exercise their power to prevent mistakes or wrongdoing by asking the right questions. Everyone is responsible for the prompt reporting of any issue, concern, violation or suspected violation of the law, our Corporate Compliance Plan, Agency policies and procedures and/or the Code of Conduct. Open lines of communication for questions and "good faith" reporting are accessible to all Affected Individuals. Mechanisms for reporting include, but are not limited to, the following:

- Open door policy (reporting up the chain of command)
- Corporate Compliance Officer
- Board of Directors and Chief Executive Officer
- Coordinator of Quality Assurance and Staff Development
- Compliance Hot Line or Mail (for identified confidential reporting or anonymous reporting)

The hotline establishes an avenue for employees, volunteers and others associated with the Agency to report in a confidential or anonymous manner. Where an anonymous method is used, no effort will be made to identify the individual making the report.

Wraparound Services of the Hudson Valley will ensure that the confidentiality of persons reporting compliance issues is maintained unless the matter is subject to a disciplinary proceeding, referred to, or under investigation by MFCU, OMIG or law enforcement, or disclosure is required during a legal proceeding, and such persons shall be protected under the required provider's policy for non-intimidation and non-retaliation. . Discrimination or retaliation against any reporter for making a good faith report of a potential compliance issue to appropriate personnel, participating in an investigation of a potential compliance issue, conducting or participating in internal reviews or self-evaluations, participating in audits and remedial actions, reporting instances of intimidation and retaliation and/or reporting potential fraud, waste or abuse to appropriate government officials is strictly prohibited.

A person, however, who knowingly files a false report, may be subject to disciplinary action up to and including termination of employment.