

POLICY STATEMENT

Topic: Code of Conduct Date Effective: 7/1/2019

Revised New Section: Corporate Compliance Number: 10.02

Date: 7/1/2019 Approved by: 

Statement of Policy

The Arc Mid-Hudson Code of Conduct is an integral component of our Corporate Compliance Plan and provides guidance to all employees and assists us to carry out our daily activities within appropriate ethical and legal standards. The Arc Mid-Hudson Code of Conduct can be found at **Exhibit A**.

Scope of Policy

This policy applies to each employee, volunteer, independent contractor/consultant, any vendor with a contract with the Agency, and Board Member. All must know, understand, and follow The Arc Mid-Hudson Code of Conduct.

Implementation of Policy

A. Employees

Each staff member will be provided with a copy of the Code of Conduct at the time of initial hire and annually.

New staff will be trained on our Code of Conduct within three (3) months of hire and will sign an acknowledgement of the Code of Conduct at that time, indicating his or her understanding and commitment to follow the Code of Conduct. The Acknowledgement Form is attached as **Exhibit B**.

Each employee will review the Code of Conduct on an annual basis. At that time, the employee will be required to re-sign the acknowledgement form.

B. Supervisors

While all employees are obligated to follow our Code of Conduct, The Arc Mid-Hudson management team is expected to set an example. We expect all of The Arc Mid-Hudson supervisory employees to: (1) exercise their responsibilities in a manner that is kind, sensitive, thoughtful, and respectful. We expect each supervisor to create an environment where all employees feel free to raise concerns and propose ideas; (2) ensure their employees have sufficient information to comply with laws, regulations and The Arc Mid-Hudson policies and procedures, including but not limited to those related to The Arc Mid-Hudson Corporate Compliance Plan and to resolve ethical dilemmas. Supervisors must create a culture within The Arc Mid-Hudson which promotes the highest standards of ethics and compliance.

C. Independent Contractors/Volunteers/Vendors

Independent contractors and vendors with a contract will be provided with a copy of the Code of Conduct at the time of entering into a written agreement with The Arc Mid-Hudson.

Each independent contractor and vendor with a contract will sign an acknowledgement of the Code of Conduct at the time of initial contracting and at renewal, indicating his or her understanding and commitment to follow the Code of Conduct.

Each volunteer will be provided with a copy of the Code of Conduct as part of the initial Volunteer Training Packet. Each Volunteer will sign an acknowledgement of the Code of Conduct indicating his/her understanding and commitment to follow the Code of Conduct. If there are significant changes made to the Code of Conduct, volunteers will be provided with the information.

The Acknowledgement Form is attached as **Exhibit C**.

D. Board Members

Each Board Member shall be provided with a copy of the Code of Conduct at the time of Board orientation and upon renewal of his or her Board seat.

Each new Board Member will be oriented within three (3) months of joining the Board of The Arc Mid-Hudson on the Code of Conduct and will sign an acknowledgement of the Code of Conduct at that time, indicating his or her understanding and commitment to follow the Code of Conduct. The Acknowledgement Form is attached as **Exhibit D**.

Exhibits

Exhibit A – The Arc Mid-Hudson Code of Conduct

Exhibit B – Employee Acknowledgement Form

Exhibit C – Independent Contractor/Vendor/Volunteer Acknowledgement Form

Name of Document: Code of Conduct 10.02

Date last updated: 6/28/2019

Updated by: MN

Exhibit A

The Arc Mid-Hudson Code of Conduct

Mission

“To empower people with intellectual and other developmental disabilities to achieve and experience the highest quality of life.”

Values

The Arc Mid-Hudson accomplishes its mission while adhering to core values:

1. Respect: Treats everyone affiliated with the agency with the same dignity and respect that they would want for themselves.
2. Integrity: With integrity as a foundation for all actions, holds themselves to the highest standards of honesty, loyalty, trustworthiness, and principles in all interactions.
3. Compassion: Exhibits kindness, understanding, empathy, and concern for the people we support.
4. Excellence: Dedicates themselves to helping ensure, either directly or indirectly, the highest standards of care are provided to the people we support on a daily basis.

Commitment to Stakeholders

To the people we support: We are committed to providing the highest quality of support, in a caring and compassionate manner.

To the communities we serve: We are committed to understanding the unique needs of the people we support and to provide our services with cost-effective, quality services.

To our employees: We are committed to a work setting which is safe, which treats all employees with fairness, dignity and respect, which affords all employees an opportunity to grow, to develop professionally, and to work in a team environment where all ideas are considered.

To our third party payors: We are committed to working with our payors in a way that demonstrates our commitment to our contractual obligations and reflects our shared concerns for quality services in an efficient and effective manner. We encourage our payors to adopt their own set of ethical principles that recognize their obligations to the individuals we serve, as well as the need for fairness between providers and payors.

To our regulators: We are committed to creating an environment in which compliance with applicable rules, laws, and regulations is woven into the fabric of The Arc Mid-Hudson. We

accept responsibility to self-govern and monitor adherence to requirements of law and our Code of Conduct.

To our suppliers: We are committed to fair competition among existing and prospective suppliers. We encourage our suppliers to adopt their own set of standards and ethical practices.

Rules of Conduct

We believe that certain rules of conduct must be observed to promote a positive and ethical work environment and pledge to abide by the laws, regulations, and The Arc Mid-Hudson policies and procedures, including, but not limited to those related to The Arc Mid-Hudson Corporate Compliance Plan.

We also understand that, as individuals working for and on behalf of The Arc Mid-Hudson, we have the added responsibility of following specific rules of conduct, as described below:

- To work cooperatively and respectfully with all The Arc Mid-Hudson employees, Board Members, and agents to provide the highest quality of services;
- To place the interests of the people we support and their family members first and foremost in all aspects of what we do;
- To represent The Arc Mid-Hudson positively in the community-at-large;
- To conduct all activities in a fiscally responsible manner;
- To work in accordance with applicable laws, regulations, and The Arc Mid-Hudson policies;
- To seek training and assistance in areas that would strengthen the ability to fulfill responsibilities to the individuals supported and The Arc Mid-Hudson;
- To avoid conflicts of interest, including the acceptance and giving of gifts;
- To conserve resources of The Arc Mid-Hudson by not engaging in wasteful behavior;
- To treat confidentially information related to The Arc Mid-Hudson and the people supported and to respect the privacy of the people supported and our fellow employees;
- To complete tasks in a timely manner and to do our best to meet expectations for the quality of work that The Arc Mid-Hudson strives to achieve;
- To bill individuals and third party payors accurately;
- To report to a supervisor or to the Compliance Hotline any potential violation of applicable laws, regulations, and policies, including the Corporate Compliance Plan;
- To respect the role of the Board and management and to fully implement their decisions; and
- To consult The Arc Mid-Hudson leadership when questions arise as to the conduct permitted under applicable laws, regulations, and policies, including the Corporate Compliance Plan.

Exhibit B

**Acknowledgement Form
The Arc Mid-Hudson Employees**

- ✓ I acknowledge that I have read and that I understand The Arc Mid-Hudson Corporate Compliance Plan and The Arc Mid-Hudson Code of Conduct.
- ✓ I understand and agree that I must comply with The Arc Mid-Hudson Corporate Compliance Plan and The Arc Mid-Hudson Code of Conduct and all laws, regulations, policies, procedures, and other guidance applicable to the responsibilities of my position.
- ✓ I agree to fully cooperate with the implementation of The Arc Mid-Hudson Corporate Compliance Plan, to participate in any auditing or monitoring processes, and to report any instances of possible violations of law, regulations, or policies that are applicable to The Arc Mid-Hudson of which I become aware.
- ✓ I acknowledge that The Arc Mid-Hudson maintains a hotline for the purpose of receiving notifications of possible violations of law, regulation, and The Arc Mid-Hudson Corporate Compliance Plan.
- ✓ I understand that my failure to report any concerns regarding possible violations of law, regulations, or the Corporate Compliance Plan may result in disciplinary action, up to and including termination.

Signature

Print Name

Title

Date

Exhibit C

**Acknowledgement Form
Independent Contractor / Volunteers / Vendors**

The Arc Mid-Hudson has developed a Corporate Compliance Plan that states that the organization and its employees, volunteers, vendors with a contract, independent contractors and Board of Directors will adhere to applicable federal, state, and local laws and regulations and internal policies and procedures.

Our Corporate Compliance Plan is a combination of policy and procedure that assists our organization to monitor, detect, and correct actions that are not in compliance with applicable laws or our own policies and procedures.

As our agent, we expect that you will act in compliance with the laws that are applicable to our organization and to your organization and in compliance with our policies and procedures, particularly our Code of Conduct that sets forth the overarching principles for conducting our business with integrity based on sound ethical and legal standards.

As our agent, we also expect you to report any suspected or potential violations of law or our policies and procedures of which you become aware by contacting our [Executive Director at _____], our Corporate Compliance Officer at _____ or our Corporate Compliance Hotline at [_____].

As our agent, we expect you to understand your role in the Corporate Compliance Plan of The Arc Mid-Hudson and we expect you to request any policies and procedures that are applicable to you and your organization. You may contact the [Executive Director] or the Corporate Compliance Officer for any questions or clarifications of your responsibilities.

* * * * *

- ✓ I acknowledge that on behalf of myself and my organization that I have read and that I understand The Arc Mid-Hudson Code of Conduct and the policies and procedures of The Arc Mid-Hudson Corporate Compliance Plan that are applicable to the services that are provided to The Arc Mid-Hudson.
- ✓ I understand and agree that I and all those in my organization who provide services to The Arc Mid-Hudson must comply with The Arc Mid-Hudson Corporate Compliance Plan and The Arc Mid-Hudson Code of Conduct and all laws, regulations, policies, procedures, and other guidance applicable to the services that are provided to The Arc Mid-Hudson.
- ✓ I agree on behalf of myself and my organization to fully cooperate with the implementation of The Arc Mid-Hudson Corporate Compliance Plan, to participate in any auditing or monitoring processes and to report any instances of possible violations of law, regulations or policies that are applicable to The Arc Mid-Hudson of which I become aware.

- ✓ I acknowledge that The Arc Mid-Hudson maintains a hotline for the purpose of receiving notifications of possible violations of law, regulation, and The Arc Mid-Hudson Corporate Compliance Plan.
- ✓ I understand that my failure to report any concerns regarding possible violations of law, regulations, or the Corporate Compliance Plan may result in corrective action, up to and including termination of my agreement with The Arc Mid-Hudson.

By: _____
Signature

Print Name

Title

Date

Exhibit D

**Acknowledgement Form
Members of The Arc Mid-Hudson Board of Directors**

- ✓ I acknowledge that I have read and that I understand The Arc Mid-Hudson Corporate Compliance Plan and The Arc Mid-Hudson Code of Conduct.
- ✓ I agree to comply with The Arc Mid-Hudson Corporate Compliance Plan and The Arc Mid-Hudson Code of Conduct and all laws, regulations, policies, procedures, and other guidance applicable to the responsibilities of my membership on The Arc Mid-Hudson Board of Directors.
- ✓ I understand that, as a member of the Board of Directors, I have a responsibility to oversee and support the implementation of The Arc Mid-Hudson Corporate Compliance Plan, including participating in monitoring, auditing, investigations, and other activities related to compliance.
- ✓ I understand that my failure to report any concerns regarding possible violations of law, regulations or the Corporate Compliance Plan may result in corrective action.

Signature

Print Name

Title

Date