

**The Arc Otsego
Information for Contractors/Agents/Vendors**

Our Corporate Compliance Plan is a combination of policy and procedure that assist our organization to monitor, detect and correct actions that are not in compliance with applicable laws or our policies and procedures. As our agent, we expect that you will act in compliance with the laws applicable to our organization and to your organization. As our agent, we expect you to report any suspected or potential violations of law or our policies and procedures of which you become aware by contacting Todd Hansen, Executive Director, at 607-432-8595, or Winn Wolfe, Chief Compliance and Quality Officer, at 607-433-8445. You may also leave a message on our Corporate Compliance Hotline at 607-353-7314.

Code of Ethics

It is the mission of the Chapter to create opportunities and provide supports to assist people with intellectual and other developmental disabilities to fulfill their personal dreams and ambitions.

It is the policy of The Arc Otsego to conduct all business in accordance with uncompromising ethical standards. We are committed to complying with all applicable laws and regulations. We believe integrity and trust are essential to the mission of serving our consumers. Adherence to such standards will not be traded or compromised for financial, professional, or other business objectives.

We ensure that all aspects of individual care and business conduct are performed in compliance with our mission statement, policies and procedures, professional standards, and applicable governmental laws, rules, and regulations.

The Chapter expects all affected individuals (defined as all persons who are affected by the provider's risk areas, including employees, the chief executive and other senior administrators, managers, contractors, agents, subcontractors, independent contractors, and governing body and corporate officers) to adhere to the highest ethical standards and to promote ethical behavior.

Standards of Conduct

It is the policy of The Arc Otsego to conduct all business in accordance with uncompromising ethical standards in adherence to all applicable laws, regulations, and Chapter policies and procedures. Therefore, the Chapter will not tolerate any form of unlawful or unethical behavior by anyone associated with the agency.

- * No dishonest statements or misrepresentation of facts are to be made in the transaction of Chapter business.
- * All billing activities and financial reports will be accurate and performed consistent with all applicable laws and regulations.
- * All affected individuals (defined as all persons who are affected by the provider's risk areas, including employees, the chief executive and other senior administrators, managers, contractors, agents, subcontractors, independent contractors, and governing body and corporate officers) will be familiar with the regulations governing their area, and alert their supervisor or the person to whom they report any instances of possible noncompliance.
- * No false statements will be made about the conditions or operation of any program operated by the Chapter.

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- * Confidential information, including prices, salaries, fees, rates, consumer information, etc., received either from within the Chapter or from other organizations will be kept confidential unless appropriately authorized to be disclosed.
- * No kickbacks, bribes, rebates, gifts, entertainment, or anything of value are to be given or received by individual employees, contracted practitioners, or Board members to influence decisions about product use, referral of consumers, or other Chapter business.
- * The Chapter's sales tax exemption is to be used only for legitimate Chapter activities.
- * All appropriate taxes will be withheld from employee wages.
- * Independent contractor status will be granted only to those who meet the legal requirements.
- * Chapter property, equipment, materials, proprietary information, and intellectual property will be used for legitimate Chapter activities, and not for private use unless appropriately authorized.
- * Only fundraising or solicitation of funds that results in a benefit to the Chapter and is approved by the Executive Director is permitted on Chapter property or with the use of the Chapter name.
- * No personal financial transactions between people receiving services and all affected individuals are permitted.
- * Stealing, taking, converting, consuming, or using Chapter property, services, and funds, or those belonging to any company or private person for personal use without the owner's consent or proper authorization is not permitted.
- * All employees must abide by the rules, regulations, and policies for equal employment opportunity. Harassment and discrimination are prohibited.
- * Conflicts of interest by Chapter employees and contractors must be avoided. Anything that may give the appearance of a conflict of interest must be disclosed to the Compliance Officer. The Executive Director and board members who are aware of any actual or perceived conflicts of interest on their part must disclose them to the Board President.
- * The Chapter will comply fully with all applicable labor laws and other statutes regulating the employer-employee relationship and the workplace environment.
- * Only persons who are legally authorized to work in the United States will be hired to work for the Chapter.
- * All employees who deal with hazardous materials and regulated medical waste must comply with environmental laws and regulations.
- * Pharmaceutical products will be properly handled and distributed only as prescribed. Unauthorized access to medications is prohibited.
- * All research involving people served by the Chapter must be pre-approved by the Chapter Human Rights Committee, the Executive Director, and the local Developmental Disability Services Office.
- * Employees must distinguish between personal and Chapter political activities.
- * Information obtained during the course of employment must remain confidential.
- * Records retention and destruction schedules must be followed.
- * Chapter procedures must be followed for the release of information for investigations by any government agencies.
- * The violation of any of these standards of conduct will result in disciplinary action up to and including termination from employment or contract with the Chapter with no regard to the person's position within the Chapter. Any member of the Board of Directors who violates these standards of conduct may be removed from the Board as outlined in the Chapter by-laws.
- * The failure to detect or to report violations of any of these standards of conduct may also result in disciplinary action up to and including termination from employment or contract with the Chapter with no regard to the person's position within the Chapter. Any member of the Board of Directors who fails to detect or to report violations of these standards of conduct may be removed from the Board as outlined in the Chapter by-laws.