



Advocates Standards of Conduct

Mission and Values

Mission

Advocates is a person-centered not for profit organization that empowers individuals with developmental disabilities to direct their own lives and create a vision for their future. Together, we advocate for a future where people with developmental disabilities can fully participate in their home, schools, and communities in a meaningful way.

Values

- We believe in the value, potential and full participation of all people in the community.
- We advocate across the life span for people with developmental disabilities and their families.
- We believe that people with developmental disabilities should have the choice to direct their own lives and choose their services and supports from all available sources.
- We believe that all is possible when we join together.
- We encourage people with developmental disabilities and their families to develop a vision for their future.

Intent

Advocates' (sometimes referred to as "organization" or "the organization") Standards of Conduct (the Standards) apply to all Affected Individuals. Affected Individuals include:

- All employees including the Executive Director and senior leadership.
- Contractors, subcontractors, independent contractors, agents.
- Corporate Officers
- Board of Directors

The Standards of Conduct are approved by Advocates' Board of Directors. This document is a formal statement of Advocates' commitment to the standards and rules of ethical conduct.

Advocates is committed to compliance with all applicable Federal and State laws and the prevention of unethical, improper, or unlawful behavior or acts in the delivery and billing of services, and prevention and detection of fraud, waste, and abuse. Advocates is committed to stopping such behavior as soon as possible after discovery, and to discipline those persons involved in such behavior or acts, including those who fail to report a violation.

All Affected Individuals, as defined above, must comply with the Standards of Conduct, immediately report any alleged violations of wrongdoing, and assist the Leadership Team and the Compliance Officer in investigating allegations of wrongdoing.



Advocates Standards of Conduct

While the standards addressed in this document are intended to guide Affected Individuals in their daily responsibilities, they do not replace any policies and procedures. If a conflict appears to exist between the Standards of Conduct and existing policies and procedures, the policies and procedures govern. Affected Individuals must seek direction from their supervisor, a Leadership Team member, or the Compliance Officer in these instances.

Ethics

It is the policy of Advocates to comply with all laws and regulations applicable to its business and to conduct business with the highest degree of integrity. To accomplish this, all Affected Individuals must obey the laws and regulations that govern their work and always act in the best interest of those who receive services and their families (collectively referred to as service recipients) and the organization.

Guidelines for Affected Individuals: Ethics

- You are expected to keep your supervisor and/or the Leadership Team informed of what you are doing; to document or record all services or transactions accurately; and to be honest and forthcoming with the organization, regulatory agencies, and internal and external auditors.
- You are expected to comply with Advocates' policies and procedures, accounting rules, and internal controls.
- You are expected to function with honesty in your work for Advocates and with service recipients, other providers, suppliers, and all others with whom the organization does business.

Conflict of Interest

For purposes of this section, an immediate family member is any person who is related by blood or marriage, or whose relationship with the Affected Individual is similar to that of persons who are related by blood or marriage. An immediate family member of a person includes:

- The person's spouse.
- Natural or adoptive parent, child, or sibling.
- Stepparent, stepchild, stepbrother, or stepsister.
- Father-in-law, mother-in-law; son-in-law; daughter-in-law; brother-in-law; or sister-in-law.
- Grandparent or grandchild; and
- Spouse of a grandparent or grandchild.

Affected Individuals may not engage in any conduct that conflicts – or is perceived to conflict – with the best interest of Advocates. You must not allow any outside financial interest or competing personal interest to influence your decisions or actions taken on behalf of the organization. This means that you or your immediate family should not personally benefit from doing business with the organization, should not have independent relationships with those who deal with the organization, should not use Advocates property for personal benefit, and should not compete with Advocates.



Advocates Standards of Conduct

You must avoid any situation where a conflict of interest exists or might appear to exist between your personal interests or those of your family and the interest of the organization. The appearance of a conflict of interest may be as serious as an actual conflict of interest.

Affected Individuals must disclose any circumstances where they or their 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 Advocates; (ii) provides to, or receives from, Advocates, any referrals of service recipients; or (iii) competes with Advocates.

If you have a potential conflict, you must make full disclosure to the Compliance Officer, members of the Leadership Team, the Board of Directors or Chair of the Finance and Audit Committee, as appropriate. You will be provided with guidance to address, mitigate, or prevent conflict of interest.

Guidelines for Affected Individuals: Conflict of Interest

It is a conflict of interest for you to personally take for yourself opportunities that are discovered through the use of Advocates' property, information, or your position with the organization; to use Advocates' property or information for personal gain; or to compete with the Advocates.

There are many types of situations where potential conflicts may arise. You must promptly report any actual or potential conflict of interest to your immediate supervisor, Leadership Team member or directly to the Compliance Officer.

Outside Activities and Employment

- You may not conduct outside activities during work time. Such activities interfere with your regular duties and negatively impact the quality of your work.
- You are a representative of the organization in your everyday life and must represent Advocates positively in the community.
- Outside employment must not conflict in any way with your responsibilities to Advocates or its service recipients. You may not compete against Advocates. You must disclose if you are employed by an Advocates' competitor or have any ownership interest in a competitor.

Use of Advocates Funds and Resources

- Advocates' assets are to only be used for the benefit of the organization and its service recipients. Assets include not only funds, equipment, inventory, and office supplies, but also concepts, business plans and strategies, information about service recipients, financial information, computer property rights, and other business information about the organization.
- You may not use Advocates' assets for personal gain or give them to any other persons or entities, except in the ordinary course of business as part of an approved transaction.
- The property and resources of the organization should only be used for the benefit of the organization or its service recipients.



Advocates

Standards of Conduct

Fair Dealing

Business Dealings and Referrals

Advocates will not be inappropriately influenced with goods or services from any business in which Affected Individuals and their immediate family members have a substantial interest.

Conducting business with providers, contractors, suppliers, service recipients, and competitors may pose ethical, and sometimes legal, problems. Affected Individuals are expected to deal fairly with providers, contractors, service recipients and competitors.

As defined in the Conflict-of-Interest Policy, and for purposes of these Standards of Conduct, an immediate family member is any person who is related by blood or marriage, or whose relationship with the Affected Individual is similar to that of persons who are related by blood or marriage. An immediate family member of a person includes:

- The person's spouse.
- Natural or adoptive parent, child, or sibling.
- Stepparent, stepchild, stepbrother, or stepsister.
- Father-in-law, mother-in-law; son-in-law; daughter-in-law; brother-in-law; or sister-in-law.
- Grandparent or grandchild; and
- Spouse of a grandparent or grandchild.

Guidelines for Affected Individuals: Fair Dealing

The Standards of Conduct and the following guidelines are intended to help you make appropriate, responsible, and correct decisions in these and all matters:

Kickbacks and Rebate

- Kickbacks and rebates in cash, credit, or other forms are prohibited. They are not only unethical, but also in many cases illegal.

Gifts and Gratuities and Entertainment

- Affected Individuals may not, without permission of the Compliance Officer, accept/solicit from, or offer anything of value to anyone doing business with Advocates.
- You may not solicit money, gifts, gratuity, or any other personal benefits or favors of any kind from providers, contractors, accounts, or service recipients and their families.
- You must not offer or accept entertainment that is not a reasonable addition to a business relationship but is primarily intended to gain favor or to influence a business decision.
- Under no circumstances may an Affected Individual or their immediate family member accept a cash gift or gratuity from a vendor or potential vendor. Any Affected Individual who gives or accepts such a cash gift or gratuity will be subject to disciplinary action, including termination of employment, contract, assignment, or relationship with Advocates.



Advocates Standards of Conduct

- Affected Individuals may not accept gifts, gratuities, and/or loans of any kind from a service recipient, a family member or friend of a service recipient. Affected Individuals may not enter into contracts, agreements and/or arrangements, whether financial or for goods/services, with a service recipient, family member or friend of a service recipient other than those contracts and agreements required/authorized by regulations for the provision of authorized services. The limited exception to these prohibitions is if the Affected Individual is an immediate family member of the service recipient and the otherwise prohibited activity takes place outside of service hours. In this instance, an immediate family member of a person includes:
 - The person's spouse/partner
 - Natural or adoptive parent, child, or sibling.
 - Stepparent, stepchild, stepbrother, or stepsister.
 - Father-in-law, mother-in-law; son-in-law; daughter-in-law; brother-in-law; or sister-in-law.
 - Grandparent or grandchild, spouse of a grandparent or grandchild.
 - Aunts, uncles, cousins.
 - Primary guardians

Any Affected Individual who accepts a gift, gratuity, loan or enters into a contract, agreement and/or arrangement outside of the limited exception will be subject to disciplinary action, including termination of employment, contract, assignment, or relationship with Advocates.

Agreements with Contractors and Vendors

Advocates must ensure that any agreements with contractors and vendors clearly and accurately describe the services to be performed or items to be purchased. Performance standards and the applicable compensation, if any, must be reasonable in amount, not be excessive in terms of industry practice, and must equal the value of the service(s) rendered or items purchased.

Improper Use of Funds or Assets

Use of the Advocates' funds or assets for any improper purpose is strictly prohibited. If you are aware of or have reason to believe that funds or assets are being improperly used, you must report this immediately to your supervisor, a Leadership Team member, or the Compliance Officer.

You may only approve payments or receipts on behalf of Advocates that are described in documents supporting the transaction. "Slush funds" or similar off-book accounts, where there is no accounting for receipts or expenditures on the organization's books, are strictly prohibited.

Maintenance of Records

Employees and independent contractors must record and report all information related to Advocates and its operations, its service recipients, and financial information fully, accurately, and honestly. Records include, but are not limited to, records of the service recipients, documentation of services, accounting books or records, financial statements, timesheets or records, expense reports, vouchers, bills, payroll, claims, payment records,



Advocates Standards of Conduct

correspondence, and any other method of communication. Employees and independent contractors must not omit or conceal any relevant information.

Guidelines for Employees and Independent Contractors: Recordkeeping

Many of Advocates' forms are legal documents used to prove that a service was provided, to bill for a service, to record a job task, or to record specific happenings. You must document accurately and honestly, and only for those services that you provided or those events in which you were involved.

Employees and independent contractors are expected to maintain complete, accurate, and contemporaneous (timely) records as required by the organization. The term "records" includes all documents, both written and electronic, that relate to the provision of services or provide support for the billing of services. Records must reflect the actual service provided.

Falsification of Records

- You must not make any false entries in any of Advocates' records or in any public record for any reason.
- You may not alter any permanent entries in Advocates' records. Any records to be appropriately altered must reflect the date of the alteration, the name, signature, and title of the person altering the document, and the reason for the alteration, if not apparent.
- You may not sign the name of another person to any document.
- Signature stamps may not be used unless the use is due to a documented reasonable accommodation as per the Americans with Disabilities Act.
- You may not create or participate in the creation of any records that are intended to mislead or to conceal anything that is improper.
- Backdating and predating documents is unacceptable.

Expense Records

- You must always charge expenses accurately and to the appropriate cost center or account, regardless of the financial status of the program, project, contract, or the budget status of a particular account or line item.

Retention of Records

- The retention, disposal, or destruction of records of or pertaining to the organization must always comply with legal and regulatory requirements and Advocates' policy.
- You may not destroy records pertaining to any legal action, government investigation or audit without written approval of the Compliance Officer.

Protection of Confidential Information

During your employment, contract, or relationship with Advocates, you may acquire confidential information about the organization, its staff, and service recipients which must be handled in strict confidence and not be



Advocates Standards of Conduct

discussed with outsiders. The protection of confidential business, employee, and service recipient information is crucial. Violations may result in fines and penalties, legal action, or criminal charges.

Advocates has developed policies and procedures to assure that the confidentiality of the organization's information and information about service recipients is protected and released only with the appropriate authorization or for lawful reasons. All Affected Individuals are required to comply with Advocates' Privacy Policy. If you have any questions concerning confidential information or the Privacy Policy, contact your immediate supervisor or the Compliance Officer.

Guidelines for Affected Individuals: Confidentiality

You must treat all of Advocates' records and business information as confidential.

You may not release confidential information without the proper authorization. Confidential information includes but is not limited to information about service recipients and their families, employees, contractors, volunteers and Board members, non-public information about Advocates that may be of use to the organization's competitors or harmful to the organization or its service recipients if released.

You must protect Advocates' information and avoid discussing or disclosing the organization's information, purposefully or inadvertently (through casual conversation), to any unauthorized person inside or outside the organization. Furthermore, staff may not share confidential information about the organization with anyone, except where required for a legitimate business purpose. Ask your supervisor if you are not sure whether certain information is confidential.

Advocates' information may not be removed from the organization's property without permission from a supervisor or administrator with proper authority over the information.

Termination of Employment or Contract

- You may not use any confidential information gained from your employment or contract with Advocates for your benefit or another organization's benefit. You may not take copies of any records, reports, documents, or any other property belonging to the organization.
- Upon termination of employment or contract with Advocates, you must return all of the organization's property including, but not limited to, copies of documents, notes, and other records containing confidential information, computer equipment, key fobs, and credit cards.

Information Security

Guidelines for Affected Individuals: Information Security and Technology

- You are responsible for properly using information stored and produced by all Advocates' computer systems.
- Computers, internet access, email, or other office communication systems are intended for business-related purposes only and not for uses that may be disruptive, offensive, harassing, or harmful to others.



Advocates Standards of Conduct

- Do not share your system username or password with another person or allow another to access the computer with your password or log-on information.
- All Affected Individuals are required to comply with Advocates' information security and technology policies. If you have any questions concerning information security or technology, contact your immediate supervisor, the Director of Information Technology, or the Compliance Officer.

Federal and State Programs

Advocates is committed to complying with the laws and regulations that govern the Federal and State programs that it administers. The Compliance Program, these Standards of Conduct, and policies and procedures are developed to provide guidance in your day-to-day work and activities you perform on behalf of the organization. You must abide by the policies and procedures and the Standards set by Advocates.

Advocates' programs and services are largely funded by Federal and State healthcare programs, including Medicaid. Advocates is committed to full compliance with all Federal and State healthcare program requirements. Advocates must also comply with laws and regulations designed to combat fraud, waste, and abuse and the submission of inaccurate or false claims.

Advocates has put in place procedures and practices to ensure that:

- All service documentation, records, and reports are prepared timely, accurately, and honestly.
- All documentation supporting claims for service is complete and maintained in accordance with regulatory requirements and Advocates' policies.
- All claims submitted to any government or private healthcare program are accurate and comply with all Federal and State laws and regulations and payer requirements.
- Claims are only submitted for authorized (medically necessary) services provided by eligible providers.
- All claims are properly documented and accurately coded, and
- Billing errors are promptly identified, and any payments received in error are promptly returned to the payer.

Employees and independent contractors responsible for the documentation, charging, coding, billing, and accounting of services must comply with all applicable State and Federal regulations and Advocates' policies and procedures.

It is against the law and Advocates' policies to submit a false claim knowingly or carelessly. Submitting a false claim includes using false records, using the wrong code, double billing, or billing, or causing to be billed, services that are not provided or fully documented, and billing for services that are not authorized (medically necessary).

All Affected Individuals have a responsibility to notify the Compliance Officer promptly if they are charged with a criminal offense related to healthcare or are proposed or found to be subject to exclusion from Federal or State healthcare programs.



Advocates

Standards of Conduct

Governmental Investigations

There may be times that Advocates is asked to cooperate with an investigation by a Federal or State governmental agency, or to respond to a request for information. A request may be formally addressed to the organization or to an individual employed by or associated with the organization. All Affected Individuals must report any requests for information or cooperation with an investigation to the Executive Director and/or Compliance Officer immediately.

Environment

Advocates is committed to creating a safe and professional environment where employees, contractors, and others are treated with respect and without regard to their race, sex, age, religion, national origin, color, marital status, disability, or other protected characteristics. Honesty, Integrity, teamwork, trust, and respect are Advocates' most important values. Unlawful discrimination or harassment of any sort violates these values. All Affected Individuals must exhibit and promote respect, integrity, trust, and teamwork and must comply with the organization's policies prohibiting discrimination and harassment throughout the organization.

All Affected Individuals are required to support Advocates' commitment to a safe and professional environment and to demonstrate appropriate behavior within Advocates' offices and virtual environments.

All Affected Individuals are prohibited from joking about another person's race, sex, age, religion, national origin, color, marital status, disability, or other protected characteristics.

All employees are prohibited from considering someone's race, color, religion, sex, national origin, age, disability, or other protected characteristic in making decisions about hiring, placement, assignment of duties, training, promotion, termination, compensation, benefits, and other work terms.

Sexual harassment is prohibited. Sexual harassment includes any form of unwelcome sexual advance, request for sexual favors, or other verbal or physical conduct of a sexual or sex-based nature.

Affected Individuals are responsible for understanding Advocates' policy prohibiting discrimination and sexual harassment. Contact Human Resources if you have questions about your right to a workplace free from unlawful harassment or discrimination or if you have questions about your duty to avoid discrimination.

Seeking Guidance and Reporting Violations

All Affected Individuals must report any suspected fraud, waste, and abuse; illegal or unethical acts; actual or suspected violations of Federal or State laws and regulations; actual or suspected violations of the Standards of Conduct, the Compliance Program and Advocates' policies and procedures; improper acts in the delivery or billing of services; and other wrongdoing (collectively referred to as "compliance concerns") to their immediate



Advocates Standards of Conduct

supervisor, member of the Leadership Team, Compliance Committee member or the Compliance Officer. Anonymous, confidential reports of suspected noncompliance can be made to the Compliance Officer 24 hours a day, 7 days a week by calling 315-457-1271 or online at the following link:

<https://forms.office.com/Pages/ResponsePage.aspx?id=0qmtWtUjMkquEa-FrT9eAwEBCblqixlApWMsa4lLx-BUMERSMUFFSOJPWTM5V08wVklNNFVWVVCwRS4u>

When actual or suspected noncompliance is reported to any Affected Individual, it must be promptly referred to the Compliance Officer. Steps will be taken to protect the confidentiality and anonymity of the reporters. The organization will not tolerate any form of retaliation or intimidation against a person who makes a good-faith report in accordance with the Standards of Conduct and its Compliance Program.

All Affected Individuals must cooperate fully and honestly in any investigation into reported noncompliance.

Corrective Action and/or Discipline

Affected Individuals found to have engaged in noncompliant activity or wrongdoing addressed in these Standards of Conduct will be subject to appropriate disciplinary action, up to and including termination of employment, contract, or relationship with Advocates.

Affected Individuals who knowingly fail to report compliance concerns are subject to appropriate disciplinary action, up to and including termination of employment, contract, or relationship with Advocates.

Employees may face disciplinary action ranging from a verbal warning, to written warning, to suspension or termination, depending on the incident and the relevant surrounding circumstances. A more significant level of discipline will be taken for intentional or reckless behavior.

Your Responsibilities

- ✓ Attend required training, and read and understand Advocates' Compliance Plan, Compliance Program Policies and Procedures, and Standards of Conduct.
- ✓ Follow Advocates' Standards of Conduct and abide by all policies and procedures, guidelines, and Federal and State laws and regulations.
- ✓ Be alert to any situation that could violate Advocates' Standards of Conduct, Compliance Program, policies and procedures, guidelines, and/or Federal and State laws and regulations.
- ✓ Promptly report any questions, issues, compliance concerns, wrongdoing, violations, or suspected violations to your supervisor, a member of the Leadership Team, a member of the Compliance Committee, or the Compliance Officer.