

Advocates Incorporated  
Effective Date: 5/1/2023  
Supersedes: 4/1/2022

Advocates Policy #: C09

Revised: 5/1/2023

## **Corporate Compliance: Gifts, Loans, Contracts, Agreements and Arrangements Between Advocates' Employees and People Receiving Services**

### Purpose:

To define Advocates' expectations of employee behavior regarding gifts, loans, contracts, agreements and arrangements between employees and people receiving services.

### Additional Authority:

OPWDD Memorandum dated 6/13/2012  
14 NYCRR 633.7(a)(2)(v)  
Social Service Law 363-D  
18 NYCRR Part 521

### Scope:

All Affected Individuals

### Responsible Employee (Title) and/or Department:

Director of Compliance, Quality, and Incident Management

### Definitions:

Affected Individuals - All Advocates' employees including the Executive Director and senior leadership, contractors, subcontractors, independent contractors, agents, corporate officers, and the Board of Directors.

Immediate Family Member - A person receiving services' 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, or primary guardian.

## **POLICY**

Advocates is committed to providing high-quality, person-centered services to individuals with developmental disabilities in an atmosphere of the utmost trust, honesty, and integrity. To this end 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.

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 contract, assignment, or relationship with Advocates.

APPROVALS

Approved by: Carol Gentry, Compliance Officer  
(Director of Compliance, Quality & Incident Management)

Signature: Carol L. Gentry DATE: 05-19-2023

Approved by: Amy Dugliss, Executive Director

Signature: Amy Dugliss DATE: 05-30-2023

Approved by: Beth Henderson, Chairperson, Compliance Committee

Signature: Beth Henderson DATE: 06-07-2023

# Signature Certificate

Reference number: HTY43-QPLSQ-AWNQQ-LK77E

## Signer

## Timestamp

## Signature

### Carol Gentry

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*Carol L. Gentry*

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### Amy Dugliss

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*Amy Dugliss*

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### Beth Henderson

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*Beth Henderson*

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✓ Email verified 07 Jun 2023 18:32:53 UTC

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Document completed by all parties on:

07 Jun 2023 18:33:23 UTC

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