



## Corporate Compliance: Standards of Conduct

### Purpose:

Advocates (sometimes referred to as “organization” or “the organization”) is committed to conducting its business ethically and in conformance with all Federal and State laws, regulations, interpretations thereof, and its Standards of Conduct. To support this commitment, Advocates will maintain and update as appropriate written Standards of Conduct to provide guidance on employee and organizational responsibilities related to compliance. The Standards of Conduct document serves as a foundational document that describes Advocates’ fundamental principles, values, and commitment to conduct its business in an ethical manner.

### Regulatory/Additional Authority:

Social Service Law 363-D  
18 NYCRR Part 521

### Scope:

All Affected Individuals

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

The Compliance Officer (Director of Compliance, Quality & Incident Management) or their designee.

### 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.

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### Policy

It is the Policy of Advocates to develop, maintain, and update as appropriate written Standards of Conduct to provide Affected Individuals with guidance on requirements for conduct related to employment, contract, relationship, or appointment by Advocates.

### Procedures

1. The Compliance Officer is responsible for the development and periodic update of Advocates’ Standards of Conduct.
2. The Standards of Conduct will be reviewed at least annually as part of the review of the Compliance Plan and Compliance Program Policies and Procedures.

3. The Compliance Committee and the Board of Directors will be responsible for oversight and final approval of the Standards of Conduct.
4. The Standards of Conduct will be written in plain language, avoiding complex legal terminology.
5. The Standards of Conduct will communicate the expectation that all Affected Individuals will act in accordance with the Standards of Conduct, that they must refuse to participate in unethical or illegal conduct, and that they must report any unethical or illegal conduct to their immediate supervisor, member of the Leadership Team, Compliance Committee member or the Compliance Officer.
6. If issues are reported to a supervisor, member of the Leadership Team, or Compliance Committee member, the person receiving the report will notify the Compliance Officer.
7. The Standards of Conduct will address specific areas of potential fraud or similar wrongdoing (e.g., claims development, submission processes, and coding).
8. The Standards of Conduct will address critical areas such as compliance with laws and regulations, key human resource practices, conflicts of interest, proprietary rights, confidentiality, recordkeeping, service provision, reimbursement practices, fair dealing, gifts and kickbacks, the organization's risk areas, and its measures to prevent fraud, waste, and abuse.
9. The Standards of Conduct will communicate the responsibility of Affected Individuals to report 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" for purposes of this Policy) directly to the Compliance Officer, their immediate supervisor, member of the Leadership Team, or Compliance Committee member.
10. The Advocates' confidential reporting and non-retaliation/non-intimidation policies will be referenced and included as part of the Standards of Conduct for the purpose of encouraging communication and the reporting of potential non-compliance.
11. The Standards of Conduct will provide written guidance on how Affected Individuals may report actual or suspected compliance concerns without fear of retribution, retaliation, or intimidation to the Compliance Officer through a confidential and/or anonymous mechanism that bypasses Leadership.
12. The Standards of Conduct will include a description of disciplinary mechanisms utilized by the organization and the procedures for addressing disciplinary actions.

13. Advocates' Standards of Conduct and Compliance Plan will be provided to all Affected Individuals as defined by this Policy.
14. Advocates' Standards of Conduct and Compliance Plan will be posted on its website.
15. The Compliance Officer in collaboration with Human Resources will ensure that all Affected Individuals, as defined by this Policy, are provided with a copy of the Compliance Plan and Standards of Conduct as part of their orientation to the organization.
16. The Compliance Officer will ensure that each Board member is provided with a copy of the Compliance Plan and Standards of Conduct at the time of Board orientation.
17. All Affected Individuals will sign and date an Acknowledgement Form that acknowledges: (a) receiving a copy of the Compliance Plan and Standards of Conduct, (b) reading and understanding the contents, and (c) agreeing to abide by the provisions of the documents as part of their onboarding and orientation to the organization.
18. The Compliance Officer will ensure that all Affected Individuals, as defined by this Policy, receive training annually related to the contents of the Standards of Conduct to help them understand how it applies to everyday situations. The Compliance Officer will ensure that records are maintained to document the receipt of training.
19. The Compliance Officer will include in their report to the Compliance Committee and Board of Directors the status of training, along with any recommendations for updating or improving the contents of the Standards of Conduct and/or training.
20. The Compliance Officer is responsible for overseeing investigations of possible violations of the Standards of Conduct and Compliance Program and ensuring that appropriate disciplinary action has been taken when necessary.

#### Attachments

- Standards of Conduct Document with Acknowledgement Form

#### Sanction Statement

Non-compliance with this policy may result in disciplinary action, up to and including termination.

#### Compliance Statement

As part of its ongoing Compliance Program review and improvement process, Advocates will review this policy at least annually and as needed to respond to changes in laws or regulations and to determine if this policy:

- Has been implemented.
- Is being followed.
- Is effective.
- Needs to be updated.

Record Retention Statement

Advocates will retain this policy and all subsequent revisions, and any related documentation will be retained for a period of, at minimum, six years.

Approval(s)

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

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