

Standard:

AccessCNY supports and expects transparency in working relationships, which includes the disclosure of conflicts of interest. The disclosure of a conflict of interest allows the agency to determine if an employee or a member of the Board of Directors (BOD) is in a position to influence a decision that may result in personal gain for that employee or BOD, or for that employee's relative, as a result of agency business dealings.

A Conflict of Interest refers to any situation in which an employee's or BOD's personal interest might contradict the interest of the company they work for. An employee's financial or other personal situation may compromise or appear to compromise: (1) an employee's or BOD's business judgment, (2) delivery of services, or (3) an employee's or BOD's ability to do their job.

The possibility that a conflict of interest may occur can be addressed and resolved before any actual damage is done. Therefore, when an employee or BOD understands or suspects that they are in a situation where a conflict of interest or a potential conflict of interest exists, it is their responsibility to bring this matter to the attention of their direct supervisor and the agency's compliance officer for resolution. In a situation where an employee or BOD is unsure whether a conflict of interest exists, it is important that it is reported so that the decision can be made by their direct supervisor or the agency's compliance officer.

Self-Direction and Consumer Directed Personal Services (CDPS) Employees Only: The existing relationship between an employee and the participant they serve is expected and is not a conflict of interest unless identified through program specific regulations. Self-Direction and CDPS employees must report all other possible conflicts of interest that may arise outside of this relationship pursuant to this Policy.

Procedure:

Employees and the BOD will complete the attached Conflict of Interest Disclosure Statement upon hire, as well as any time they become aware of a situation that presents a conflict of interest or a potential conflict of interest. The disclosure statement must be completed immediately upon the employee or BOD discovering a conflict of interest or a potential conflict of interest. The employee or BOD will forward the completed disclosure statement to their direct supervisor and to the agency's compliance officer for review.

All conflicts will be resolved as ethically and as fairly as possible. The resolution of a conflict of interest will be documented on the Conflict of Interest Resolution Form. Both the disclosure statement

and the resolution form will be kept in a file on SharePoint that is managed by the Compliance Officer or designee.

It is an employee's or BOD's responsibility to recuse themselves from situations that may cause a conflict of interest. In cases where a conflict of interest or a potential conflict of interest is concealed, or when a solution cannot be found, disciplinary action may be taken up to, and including, termination.

See attachments:

AccessCNY Conflict of Interest Disclosure Statement AccessCNY Conflict of Interest Resolution Form