

**Standard:**

AccessCNY employees and affected individuals will maintain the highest standards of ethical conduct and compliance with all applicable Federal and State laws and regulations as well as AccessCNY's Guiding Principles located in the HR Policy 104.

**Procedure:**

- AccessCNY employees and affected individuals will adhere to the agency's guiding principles as provided in HR Policy 104.
- AccessCNY employees and affected individuals will provide quality care in the most appropriate setting that is necessary, verifiable and respects the rights and dignity of the individual.
- AccessCNY employees and affected individuals will comply with all applicable laws, regulations, standards and requirements.
- AccessCNY employees and affected individuals will not pursue any business opportunity that requires engaging in unethical or illegal activity.
- AccessCNY employees and affected individuals will maintain accurate and complete records of all services provided with proper documentation as required by regulatory agencies.
- AccessCNY employees and affected individuals will submit claims and billing statements in a timely manner that accurately reflect rendered services. AccessCNY employees and affected individuals will not submit false, fraudulent or fictitious claims.
- AccessCNY will provide a mechanism for anyone to report compliance concerns and a process to investigate issues. AccessCNY employees and affected individuals are expected to participate in an initial and annual Corporate Compliance training. AccessCNY employees and affected individuals are expected to report any unethical, illegal or fraudulent incidents to the Corporate Compliance Officer in a timely manner without fear of reprisal in accordance with the agency's Whistleblower policy.
- AccessCNY will ensure compliance with regulations under the Health Insurance Portability and Accountability Act of 1996 (HIPAA). AccessCNY shall maintain the highest degree of confidentiality regarding participants, personnel, and business information consistent with the law.

- AccessCNY will only employ persons with proper credentials, experience and expertise.
- AccessCNY values diversity and will not discriminate in any matter based on ethnic background, disability, national origin, sex, age, marital status, sexual orientation or any other protected category.
- AccessCNY employees and affected individuals should avoid any activity that conflicts with the interests of the agency.
- In accordance with the Anti-kickback Statute:
  - a) AccessCNY employees and affected individuals will not accept or provide benefits that could be seen as creating conflict between their personal interests and the agency's legitimate business interests. This includes accepting expensive meals, gifts, refreshments or entertainment.
  - b) Any contributions or donations will be obtained without coercion, force or expectation of compensation in return.
  - c) AccessCNY employees or affected individuals will not pay employees, physicians, or other health care professionals, directly or indirectly, in cash or by any other means, for referral of patients. Every payment to a referral source must also be supported by proper documentation.
- AccessCNY employees and affected individuals are responsible and accountable for proper expenditure of the agency's funds and for the proper use of agency property.
- Any improper financial gain to the employee through misconduct involving misuse of the agency's or participants' funds or property is prohibited.
- AccessCNY shall prepare and maintain accurate and complete cost reports, financial records and statements regarding the agency's assets, liabilities, revenue and expenditures, according to generally accepted accounting principles.
- AccessCNY employees who violate the agency's Code of Ethical Conduct may receive disciplinary action, up to and including termination.