

# Crystal Run Village, Inc. CODE OF ETHICS

## Mission and Values

Crystal Run Village, Inc. (sometimes referred to as “CRVI” or the “Agency”) offers the means to the fullest enjoyment of a citizen’s privileges and responsibilities. CRVI provides only those supports and trainings that are consistent with fostering growth, developing independence and maximizing participation in our society.

In order to fulfill this mission, CRVI offers services in such areas as vocational training and placement, residential services, educational opportunities, recreational training and opportunities, and personal and domestic skills training.

The Board of Directors, Executive Director, and the senior management staff require that all members of the CRVI community observe high standards of ethical conduct in order to fulfill the Agency’s mission with integrity and assure public confidence. As a guide to ethical conduct, the Executive Director and the Board of Directors adopt the following statement of values for all members of the CRVI community to uphold.

The leaders of CRVI commit to building a community that:

- Values integrity, trustworthiness and honesty
- Strives for excellence in all that we do
- Promotes the dignity and participation of every person
- Supports individual development, personal achievement, and life-long learning
- Fosters innovation and creativity
- Rewards loyalty, teamwork and perseverance

## Intent

CRVI’s Code of Ethics (the Code) applies to all employees and independent contractors.

The Code of Ethics was approved by CRVI’s Board of Directors and is a formal statement of the Agency’s commitment to the standards and rules of ethical conduct.

CRVI is committed to preventing the occurrence of unethical or unlawful behavior, stopping such behavior as soon as possible after discovery, and to discipline employees who violate the Code, including employees who neglect to report a violation.

All employees must comply with this Code, immediately report any alleged violations of wrongdoing, and assist management and compliance personnel in investigating allegations of wrongdoing.

While the guidelines addressed in the Code of Ethics are intended to guide employees in the course of their day-to-day responsibilities, they do not replace any Agency or program policies and procedures. There may be instances that are not addressed by the Code of Ethics or existing policies and procedures, or activities that may conflict with these guidelines. Employees must seek direction from their supervisor, other Agency management staff or the Compliance Officer in these instances.

## **Ethics**

It is the policy of CRVI to observe all laws and regulations applicable to its business and to conduct business with the highest degree of integrity. To accomplish this, all employees and contractors must obey the laws and regulations that govern their work and always act in the best interest of the customers, their families, and the Agency.

### **Guidelines for employees and contractors**

- You are expected to keep management staff informed of what you are doing to document or record all services or transactions accurately; and to be honest and forthcoming with the Agency, regulatory agencies, and internal and external auditors.
- You are expected to comply with the Agency's policies and procedures, accounting rules, and internal controls.
- You are expected to function with honesty in your work for the Agency and with customers, providers, suppliers, and all others with whom the Agency does business.

## **Conflict of Interest**

Employees and contractors must not allow any outside financial interest or competing personal interest to influence their decisions or actions taken on behalf of the Agency.

Employees and contractors must avoid any situation where a conflict of interest exists or might appear between their personal interests and those of the Agency. The appearance of a conflict of interest may be as serious as an actual conflict of interest.

### **Guidelines for Employees and Contractors**

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

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

### Outside Activities and Employment

- You may not conduct outside activities during work time. This can include conducting personal business during work time. Making or receiving a personal phone call should occur during non-working hours or breaks. Such activities interfere with your regular duties and negatively impact the quality of your work.
- You are a representative of the Agency in your every day life and must represent the Agency positively in the community.
- Outside employment must not conflict in any way with your responsibilities to the Agency or its customers. You may not compete against CRVI, or have any ownership interest in a competitor.

### Use of Agency Funds and Resources

- The Agency's assets are to only be used for the benefit of the Agency and the customers. Assets include funds, equipment, inventory, and office supplies, but also concepts, business plans and strategies, information about people served, financial information, computer property rights, and other business information about the Agency.
- You may not use Agency 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.

### Business Dealings Between the Agency and Employees

CRVI will not participate in any arrangement, agreement, investment or other activity that could result in personal benefit for you or your immediate family members at the expense of the Agency or its consumers.

- Property and resources of the Agency should only be used for the benefit of the Agency or the customers.

## **Maintenance of Records**

Employees and contractors must record and report all agency, customer, and financial information fully, accurately, and honestly. Records include, but are not limited to, records of the customers, documentation of services, accounting books or records, financial statements, timesheets or records, mileage reimbursement, expense reports, vouchers, bills, payroll, claims payment records, correspondence, and any other method of communication. Employees or contractors must not omit or conceal any relevant information.

## **Guidelines for Employees and Contractors**

Many of the Agency 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 you were involved in.

### **Falsification of Records**

- You must not make any false entries in any of the Agency's records or in any public record for any reason.
- You may not alter any permanent entries in the Agency's records.
- You may only approve payments or receipts on behalf of the Agency 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 Agency's books, are strictly prohibited.
- You may not create or participate in the creation of any records that are intended to mislead or to conceal anything that is improper.

### **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, or 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 Agency must always comply with legal and regulatory requirements and Agency policy.
- You may not destroy records pertaining to litigation or government investigations or audit without express written approval of the Compliance Officer.

## **Protection of Confidential Information**

During your employment, you may acquire confidential information about CRVI, its staff, and customers that must be handled in strict confidence and not discussed with outsiders. The protection of confidential business, staff, and consumer information is very important.

The Agency has developed policies and procedures to assure that the confidentiality of Agency information and information about the customers is protected and released only with the appropriate authorization or for lawful reasons. All employees and contractors are required to comply with CRVI's Privacy Policy. If you have any questions concerning

confidential information or the Privacy Policy, contact your immediate supervisor or the Compliance Officer.

### **Guidelines for Employees and Contractors**

You must treat all Agency records and information as confidential.

Specific policies and procedures are in place to address the use and release of Protected Health Information (PHI) in accordance with HIPAA requirements.

You may not release confidential information without the proper authorization. Confidential information includes not only information about the people that we serve and their families, but also non-public information about the Agency that may be of use to the Agency's competitors or harmful to the Agency or its customers if released.

You must protect Agency information and avoid discussing or disclosing Agency information, purposefully or inadvertently (through casual conversation), to any unauthorized person inside or outside the Agency. Furthermore, staff may not share confidential Agency information with anyone, except where required for a legitimate business purpose.

Agency information may not be removed from Agency property without permission from a supervisor or administrator with proper authority over the information. Ask your supervisor if you are not sure whether certain information is confidential.

### **Termination of Employment**

- You may not use any confidential information gained from your employment with the Agency for your or another company's benefit. You may not take copies of any reports, documents, or any other property belonging to the Agency.
- Upon termination of employment with the Agency, you must return all Agency property including, but not limited to, copies of documents, notes, and other records containing confidential information; computer disks; Agency ID; keys and credit cards.

### **Information Security**

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

- Do not share your system user name or password with another person or allow another to access the computer with your password.
- All employees and contractors are required to comply with CRVI's Workplace Access and Facilities Security Policy and Procedure. If you have any questions concerning information security, contact your immediate supervisor or the Compliance Officer.

## **Protection of People with Special Needs**

A Code of Conduct has been established by the Justice Center for the Protection of People with Special Needs. CRVI has adopted that Code of Conduct. It requires that each year anyone who has regular and substantial contact with any person receiving supports or services from CRVI must acknowledge and sign to attest they will act in accordance with the following provisions:

- Person Centered Approach
- Physical, Emotional and Personal Well-being
- Respect, Dignity and Choice
- Self-Determination
- Relationships
- Advocacy
- Personal Health Information and Confidentiality
- Non-Discrimination
- Integrity, Responsibility and Professional Competency
- Reporting Requirement

## **Fair Dealing**

Conducting business with providers, contractors, suppliers, customers, and competitors may pose ethical problems. Employees and contractors are expected to deal fairly with providers, contractors, customers, and competitors.

The Code of Ethics 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 in many cases, illegal.

### Gifts and Gratuities and Entertainment

- You may not solicit money, gifts, gratitude, or any other personal benefits or favors of any kind from providers, contractors, producers, accounts, or customers 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.

### Agreements With Contractors and Vendors

The Agency must assure 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 services rendered.

### Improper Use of Funds or Assets

Use of the Agency's 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 or the Compliance Officer.

## **Federal and State Programs**

CRVI is committed to complying with the laws and regulations that govern the Federal and State programs that it administers. Policies and procedures, the Corporate Compliance Program, and this Code of Ethics are developed to provide guidance in your day-to-day work. You must abide by the policies and procedures and the standards set by the Agency.

## **Governmental Investigations**

There may be times that the Agency 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 Agency or an individual within the Agency. Employees and contractors must report any requests for information or cooperation with an investigation to the Compliance Officer immediately.

## **Employment Environment**

CRVI is committed to creating a safe and professional workplace where employees 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. Business integrity, teamwork, trust, and respect are the Agency's most important values. Unlawful discrimination or harassment of any sort violates these values. All Agency employees must exhibit and promote respect, integrity, trust, and teamwork in the workplace and must comply with this policy prohibiting discrimination and harassment in all facets of the Agency's work.

## **Guidelines for Employees and Contractors**

All employees are required to support the Agency's commitment to a safe and professional work environment and to demonstrate appropriate behavior in the workplace.

All employees are prohibited from making fun of another employee'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.

You are responsible for understanding the Agency's policy prohibiting discrimination and sexual harassment. You should consult with an appropriate supervisor or administrator 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**

Employees and contractors must report any actual or suspected violations of this Code of Ethics, any applicable law or regulation, or any Agency policy and procedure to their immediate supervisor or the Compliance Officer. A Compliance Hotline is also available for confidential or anonymous reporting of such issues. The Compliance Hotline number is (845)467-6190.

When an actual or suspected violation of this Code of Ethics, any applicable law or regulation, or any Agency policy and procedure is reported to any Agency employee, it must be promptly referred to the Compliance Officer. Steps will be taken to protect confidentiality and anonymity, when appropriate and warranted. The Agency will not tolerate any form of retaliation against a person who makes a good-faith report in accordance with this Code of Ethics.

All employees and contractors must cooperate fully and honestly in any investigation into a reported violation of this Code of Ethics, any applicable law or regulation, or Agency policy, procedure, or practice.

## **Corrective Action and/or Discipline**

Any employee or contractor who violates or knowingly fails to report any violation of this Code of Ethics, any applicable law or regulation, or Agency policy, procedure, or practice is subject to appropriate disciplinary action, up to and including termination.

Disciplinary action may range from a warning to suspension or discharge, depending upon the nature of the incident and the relevant surrounding circumstances.

## **Your Responsibilities**

- ✓ Attend required training, and read and understand CRVI's Corporate Compliance Plan, Compliance Policies and Procedures, and Code of Ethics.
- ✓ Read, understand and sign the attestation annually The Code of Conduct for Custodians of People with Special Needs.
- ✓ Prevent abuse, neglect and harm to all persons receiving supports or services from the Agency.
- ✓ Follow the Agency's Code of Ethics and abide by all policies and procedures, guidelines, and Federal and State laws and regulations.
- ✓ Be alert to any situation that could violate the Agency's Code of Ethics, policies and procedures, guidelines, and/or Federal and State laws and regulations.
- ✓ Promptly report any issues, concerns, violations, or suspected violations to your supervisor, other management staff, Director of Human Resources, Compliance Officer, or the Executive Director.