

CAMP VENTURE, INC.

CODE OF CONDUCT

Mission and Values:

The Venture organization is a not-for-profit provider of habilitative services and family-like care to the developmentally disabled, committed to establishing for those in care a quality of life, wealth of opportunity and choice, warmth of concern and potential for growth equal to that available to their non-disabled peers.

Venture is, moreover, an advocate for the rights, liberties and opportunities for all developmentally disabled persons in society, a champion of their right to a valued and dignified place in the community, and a protagonist for their liberation from the cultural prejudice that limits full acceptance of their birthright as Americans.

Intent:

Camp Venture's Code of Conduct applies to all employees and independent contractors.

NOTE: This is a policy specifically concerning how the agency conducts its business and while the ethical provisions apply to ALL conduct, concerns regarding HIPAA violations and other specifically consumer-related issues are to continue to be reported to the Director of Quality Assurance/HIPAA Coordinator who will be responsible for reporting to the Corporate Compliance Officer when appropriate.

The Code of Conduct was approved by Camp Venture's Board of Directors and is a formal statement of the Agency's commitment to the standards and rules of ethical conduct.

Camp Venture is committed to preventing the occurrence of unethical or unlawful behavior, stopping such behavior expeditiously and with all due diligence 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 or wrongdoing, and assist management and compliance personnel in investigating allegations of wrongdoing. Employees who do not act to prevent, intervene in and voluntarily report violations or wrongdoing are subject to immediate discharge from employment.

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

Ethics

It is the policy of Camp Venture 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 comply with the laws and regulations that govern their work and always act in the best interest of the people we serve, 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 people we serve, 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. 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. Making negative public statements about Camp Venture, about persons with developmental disabilities or mental illness or other disabling conditions, whether served by Camp Venture or any other public or private service provider or about community programs for persons with disabilities shall be considered a conflict of interest and contrary to our mission as an organization and subject to corrective and or disciplinary action up to and including discharge from employment (see below).
- Membership in organizations opposed to the goals and mission of full community participation for persons with disabilities in the life of our society is likewise a violation of the code of conduct
- Outside employment must not conflict in any way with your responsibilities to the Agency or its consumers. You may not use information or contacts made at Venture to give another entity or individual an unfair advantage in competing for contracts, reimbursement or services. This policy is not meant to hinder in any way the exchange of information necessary to provide services to consumers or to interfere with the free exercise of consumer choice that requires sharing of data and other vital personal information with other providers of service.

Use of Agency Funds and Resources

- The Agency's assets are to only be used for the benefit of the Agency and the people we serve. 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.

Confidentiality

- During your employment, you may acquire confidential information about Camp Venture, its staff and people we serve that must be handled in strict confidence and not discussed with outsiders. The protection of confidential business, staff and consumer information is very important. This policy is meant to supplement, not supercede all other applicable policies. In matters of direct services to consumers, all applicable laws and regulations, including but not restricted to HIPAA regulations apply. Violations of HIPAA regulations are to be reported to the HIPAA Officer.

Business Dealings Between the Agency and Employees

- Camp Venture will not be inappropriately influenced with goods or services from any business in which you or your immediate family members have a substantial interest.
- Property and resources of the Agency should only be used for the benefit of the Agency or the people we serve.

Maintenance of Records

Employees and contractors must record and report all agency, consumer and financial information fully, accurately and honestly. Records include, but are not limited to records of the people we serve, documentation of services, accounting books or records, financial statements, timesheets or records, 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 a consumer, 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-the-books accounts, where there is no accounting for receipts or expenditures on the agency 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.

Violations of the above policy provisions are grounds for discharge from employment, or termination of contract as appropriate. All policy infractions must be reported to the Corporate Compliance Officer along with corrective and disciplinary action taken.

Protection of Confidential Information

Camp Venture has developed policies and procedures to assure that the confidentiality of agency information and information about the people we serve is protected and released only with the appropriate authorization or for lawful reasons; as HIPAA regulations and all other applicable confidentiality laws and regulations with respect to direct consumer services. If you have any questions concerning confidential information or the Privacy Policy contact the Corporate Compliance Officer, or, in situations related to HIPAA violations or consumer confidentiality, to the HIPAA Officer.

Guidelines for employees and contractors:

You must treat all Agency records and information as confidential.

You may not release confidential information without the proper authorization, including 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 Information Technology Security policy. If you have any questions concerning information security, contact your immediate supervisor or Standards of Practice Officer. With respect to habilitation, service plans, medical and other consumer records, contact the HIPAA officer where appropriate.

Fair Dealing

Conducting business with providers, contractors, suppliers, people we serve, and competitors may pose ethical problems. Employees and contractors are expected to deal fairly with providers, contractors, the people we serve, our sister service providers and competitors as well.

The Code of Conduct 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 form 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 people we serve 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.
- Camp Venture has a \$35 value limit on gifts that may be accepted by employees provided those gifts are not in exchange for favors, special services or any other special consideration.

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

Camp Venture is committed to complying with the laws and regulations that govern the federal and state programs that it administers. Policies and procedures, the Compliance (Standards of Practice) Program and this Code of Conduct 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.

Political Activities and Contributions

Because the Agency is a non-profit organization, it is prohibited from engaging in any political campaign activities and a "substantial" amount of lobbying

Guidelines for Employees and Contractors:

Agency funds and resources, including your work time, may not be used for political contributions or activities.

You may not act as a representative of the Agency in any political campaign activity. In expressing your personal political views or support or opposition of a candidate for public office, it must be very clear that you are expressing your personal view, support or opposition as an individual and not a representative of the Agency.

Laws and regulations prohibit a "substantial" amount of lobbying. There are allowances for the Agency to advocate its position on public issues. To assure that the Agency does not violate any laws or regulations, or risk losing its tax-exempt status, you must seek prior approval from the Compliance Officer before engaging in any lobbying activities. The Standards of Practice Officer may need to consult with legal counsel on the matter and will need to record the amount of time spent in lobbying activities.

Employment Environment

Camp Venture 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, sexual orientation, 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 joking about another employee's race, sex, age, religion, national origin, color, marital status, disability, sexual orientation, or other protected characteristics.

All employees are prohibited from considering someone's race, color, religion, sex, national origin, age, disability, sexual orientation, or other protected characteristic in making decisions about hiring, placement, assignment of duties, training, promotion, termination, compensation, benefits and other work terms. Violations of Agency policy regarding discrimination will be treated with the utmost gravity and will result in immediate discharge from employment upon substantiation.

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. Violations of the Agency's policies with respect to discrimination and sexual harassment will be treated with the utmost gravity and will result in immediate discharge from employment upon substantiation.

Seeking Guidance and Reporting Violations

Employees and contractors must report any actual or suspected violations of this Code of Conduct, or of any applicable law or regulation, or of any Agency policy and procedure to their immediate supervisor of the Standards of Practice Officer. A confidential Compliance Hotline is also available for confidential or anonymous reporting of such issues. All calls to the hotline will be monitored by the Standards of Practice Officer and/or Director of Quality Assurance only. The Standards Hotline number is (845) 624-4039.

When an actual or suspected violation of this Code of Conduct, any applicable law or regulation, or any Agency policy and procedure is reported to any Agency employee, it must be promptly referred to the Standards of Practice 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 Conduct.

All employees and contractors must cooperate fully and honestly in any investigation into a reported violation of this Code of Conduct, any applicable law or regulation, 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 Conduct, any applicable law or regulation, 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 Camp Venture's Corporate Compliance (Standards of Practice) Plan, HIPAA policy, Corporate Compliance Policies and Procedures, and Code of Conduct.
- ✓ Follow the Agency's Code of Conduct 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 Conduct, 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, Standards of Practice Officer, or the Chief Executive Officer.

Camp Venture, Inc.

Promulgated 3/07: For Employee Handbook

CORPORATE COMPLIANCE COMMUNICATION

Camp Venture has implemented a Corporate Compliance Program, which includes a Code of Conduct applicable to all employees. Each employee is required to review the Code of Conduct and comply with the Corporate Compliance Program. This program is essential to excellence in service to our consumers, and to the integrity of the agency. Failure to report a suspected violation of the Corporate Compliance Program, participation in non-compliant behavior, and/or encouraging, directing, facilitating or permitting non-compliant behavior will result in disciplinary action up to and including termination of employment. The level of discipline is to be determined by the seriousness of the infraction, its frequency, the employee's record of service and supervisor's discretion. All disciplinary infractions related to corporate compliance must be reported to the Corporate Compliance Officer along with the disciplinary actions taken.

As part of our compliance program, any employee who is convicted of a felony or misdemeanor must immediately make a confidential report of such conviction to the Human Resources Director. Any employee who is excluded from or sanctioned by either the Medicare or Medicaid program must immediately report that fact to the Compliance Officer. Failure to comply will result in immediate discharge from employment.

The federal False Claims Act authorizes the use of civil penalties of between \$5,000 and \$10,000, plus three times the amount of damages the government sustains, where a person knowingly presents, or causes to be presented, a false record or statement to get a false or fraudulent claim paid; conspires to defraud the government in connection with the payment of a false or fraudulent claim. In addition, under New York State Law it is a crime to knowingly and willfully provide false information or omit material information when billing for services. Submitting or causing a false claim to be submitted is an unacceptable practice under the New York State Medicaid Program, which can lead to fines and exclusion from the Medicaid program. In addition, there are both Federal and State laws related to kickbacks and inappropriate referrals that impose criminal and civil penalties for violations.

Our Corporate Compliance Program was created to assist the organization in detecting fraud, waste and abuse so that appropriate measures may be taken. Employees who participate in the investigation of a possible False Claims Act violation may not be retaliated against.