

## **CODE OF ETHICS & CONFLICT OF INTEREST POLICY**

### **Intent**

The Code of Ethics applies to all employees, Executives, Board members, independent contractors, volunteers, interns and vendors (“Affected Individuals”). The Code of Ethics describes the behaviors and practices that are expected by those who work at, or for, Camp Venture.

### **Core Values**

➤ **Integrity**

Camp Venture will consistently strive to adhere to high moral principles, professional standards and ethical behavior.

➤ **Accountability**

Camp Venture will be responsible for the commitments made and deliver excellent services.

➤ **Quality Services and Supports**

Camp Venture will provide services and supports of the highest quality that responds to the needs of those we support.

### **Leadership Responsibilities**

Camp Venture’s Executives, Board members and supervisors have additional responsibilities under the Code of Ethics to:

- Provide leadership, planning and strategic direction that reflects the mission, vision and values of Camp Venture;
- Conduct business activities truthfully, accurately and ethically in compliance with legal and regulatory requirements and in accordance with approved policies and procedures;
- Lead by example – show what it means to act with integrity;
- Ensure that those they supervise have adequate knowledge; training and resources to follow the standards listed in the Code of Ethics;
- Monitor the compliance of the people they supervise;
- Enforce the standards of the Code of Ethics and all related Agency policies;
- Support employees who in good faith raise questions or concerns about compliance and integrity issues. This means retaliation of any kind is not permitted; and
- Report potential instances of non-compliance to the Chief Compliance Officer or designee.

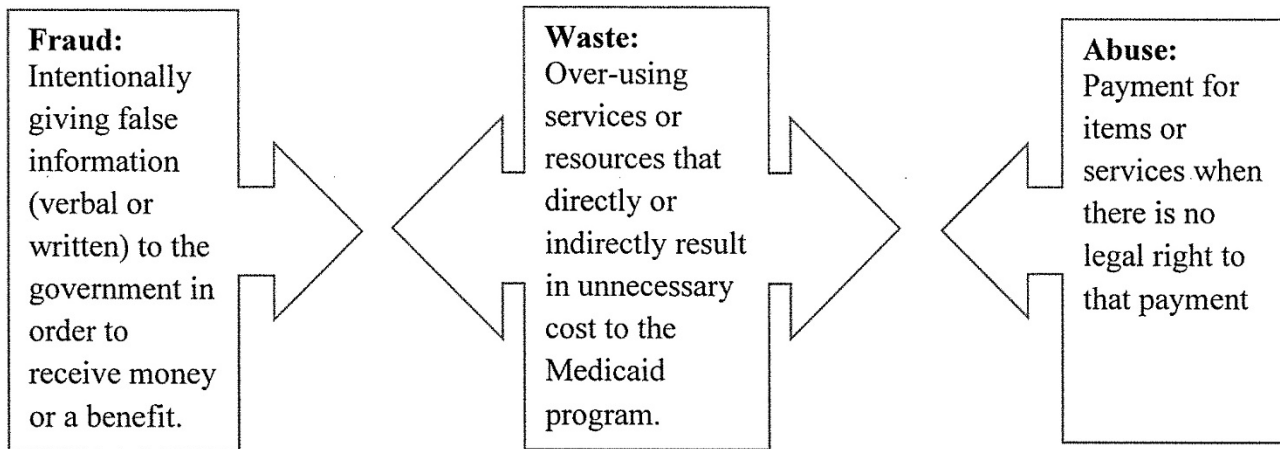
### **Create a Culture of Open and Honest Communication**

At Camp Venture, everyone should feel comfortable to speak his or her mind, particularly with respect to ethical concerns. Managers have the responsibility to create an open and supportive environment. We all benefit tremendously when employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

Camp Venture will investigate all reported instances of questionable or unethical behavior, including allegations of sexual harassment and discrimination or any other unethical behavior.

## **Prevent Fraud, Waste and Abuse**

Camp Venture is committed to detecting and preventing fraud, waste and abuse. The Agency has developed and implemented policies and procedures to ensure compliance with the laws that govern our operations as a health care entity.



In addition to written policies and procedures, Camp Venture provides regular education to Employees, Executives and Board members on preventing fraud, waste and abuse through general and focused compliance training on applicable laws and regulations.

These include, but are not limited to, the Federal False Claims Act (31 U.S.C. §§ 3729-3733), and similar state laws which assist the federal and state governments in preventing fraud, waste and abuse and recovering financial losses. These laws prohibit knowing and/or intentional use of false or fraudulent claims, records or statements; for the purpose of obtaining payment from the government, including Medicare and Medicaid programs.

Examples may include:

- Submitting, or causing to be submitted, a false claim for services (i.e., claims for services not provided or lacking supporting documentation).
- Submitting claims to any payer, including Medicaid, for services and supplies that are not medically necessary or that were not included in the individual's service plan.
- Double billings (billing for the same item or service more than once; billing for more than one service during the same time period).
- Providing false information on cost reports or other documentation filed or used with Medicare or Medicaid.
- Knowingly and willfully making materially false statements concerning federal health care programs (i.e., seeking payment for services that were never provided or provided at levels less than reported – half day/full day, billable units).
- Causing someone else to submit a false or fraudulent claim to the government for reimbursement.
- Use of the mail wire communication (telephone) or other technology to carry out a scheme to defraud, obtain money or property through false pretense.
- Paying or receiving anything of financial benefit in exchange for referrals.
- Billing for services or supplies that are included in the service rate or other payer.

A violation of these laws could place Camp Venture and individual(s) in serious jeopardy of civil, criminal and/or administrative penalties including monetary penalties, imprisonment and exclusion from participation in Medicare or Medicaid and loss of provider certification.

Federal law and some state laws allow private citizens to file a lawsuit on behalf of the government and share a percentage of any settlement. These laws and Camp Venture policy prohibit retaliation or discriminating against anyone because of their initiation of, or participation in a lawful false claims investigation, report, claim or proceeding. These laws also provide for certain monetary awards and equitable relief to a prevailing complainant, including compensation for lost wages and reinstatement to a former position.

### **Independent Contractors and Vendors**

Any independent contractor, subcontractor or vendor conducting business on behalf of Camp Venture must adhere to all applicable laws and regulations. When applicable, independent contractors providing care on behalf of the Agency, must show proof of licensure, certification or other evidence of provider competency. Independent contractors providing care on behalf of Camp Venture must not possess a criminal conviction record that prohibits them from participating in a health care program under state or federal laws and/or Camp Venture criminal background screening.

### **Conflicts of Interest**

Employees, Executives, Board members, independent contractors, volunteers, interns and vendors must not allow any outside financial interest, or competing personal interest to influence their decisions or actions taken on behalf of Camp Venture. Employees, Executives, Board members, independent contractors, volunteers, interns and vendors must avoid any situation where a conflict of interest exists or might appear to be a conflict of interest.

Employees, Executives, Board members, independent contractors, volunteers, interns and vendors must:

- Ensure that professional, personal and occupational interests do not affect judgment, competence or relationships with those supported or with whom business is conducted.
- Make every effort to avoid relationships that could impair personal judgment and lead to an actual or potential conflict of interest.
- Ensure that business dealings with outside entities do not result in unusual personal gain. Unusual gain refers to any payment, gifts, gratuity, bribes, travel, services, accommodations, entertainment, product bonuses, special fringe benefits, unusual price breaks, and other windfalls designed to ultimately benefit Camp Venture employees, Executives, Board members, or independent contractors, or that would reasonable be determined to influence the Agency, employees, Executives, Board members, or independent contractors.
- Comply with anti-trust laws and not engage in discussions or agreements with competitors regarding pricing, prices paid to suppliers or providers, or joint actions or boycotts, unless such activity is protected by law.
- Promptly report any actual or potential conflicts of interest to your immediate supervisor and if related to the Board of Directors, to the Chairman of the Board or other Cabinet member.
- Program Directors may not hire their own family member, relatives, or relatives of their current employees to work together in the same program or residence (refer to the Employee Handbook for further information).

### **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 member(s) have a substantial interest.

## 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 everyday life and must represent the Agency positively in the community. Making negative public statements about Camp Venture, about persons with intellectual or developmental disabilities or other disabling conditions, whether served by Camp Venture or any other public or private service provider, shall be considered a conflict of interest and contrary to the Agency's mission and will be subject to corrective and/or disciplinary action up to, and including, termination from employment.
- Membership in an organization opposed to the values and mission of full community participation for persons with disabilities in the life of our society is likewise, a violation of the Code of Ethics.
- Outside employment must not conflict in any way with your responsibilities to the Agency or persons supported. You may not use information or contacts made at Camp Venture to give another entity or individual an unfair advantage in competing for contracts, reimbursement or services.

## Use of Agency Funds and Resources

Use of Camp Venture funds or assets for any improper use is strictly prohibited. Camp Venture's assets are to only be used for the benefit of Camp Venture and the individuals we support. Assets include funds, equipment, inventory, office supplies, but also concepts, business plans and strategies, information about the people we support, financial information, computer property rights, and other business information about Camp Venture.

You may not use Camp Venture's 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.

Employees and those who represent Camp Venture are trusted to behave responsibly and use good judgment to conserve Camp Venture resources. Supervisors/Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

If you are aware or have reason to believe that funds or assets are being improperly used, you must report this immediately to your supervisor or the Chief Compliance Officer.

## Annual Conflict of Interest Disclosure by Key Employees & Board Members

Conflict of Interest Disclosure forms will be completed by Key Employees and Board members upon hire or appointment to the Board and annually thereafter. For the purposes of this policy, a Key Employee is defined as an Executive level employee who has the authority to make substantial financial decisions on behalf of Camp Venture.

## Employees

Employees are required to notify Human Resources of any actual or potential conflict of interest as indicated in this policy (also found in the Employee Handbook).

## **Protection of Confidential Information**

### Confidential and Proprietary Information

Integral to Camp Venture's business success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, persons supported, family members and other business partners. Confidential and proprietary information includes such things as financial data, individual's names/addresses, or information about current or potential suppliers or vendors.

During your employment or affiliation with Camp Venture, you may acquire confidential information about Camp Venture, its staff and people we support that must be handled in strict confidence and not discussed with outsiders. The protection of confidential business, staff and persons supported information is very important and shall not be disclosed without a valid business purpose and proper authorization.

Under the Health Insurance Portability and Accountability Act (HIPAA), Camp Venture, its employees, Executives, Board members, independent contractors, volunteers, interns and vendors are all responsible for maintaining confidentiality of protected health information (PHI). PHI is defined as individually identifiable health information that is created, received, maintained or transmitted in any form, including electronic health information. Any unauthorized exposure of PHI, which reasonably compromises the security or privacy of PHI is a potential breach that must be appropriately addressed. If you become aware of a breach or potential breach of PHI, it is necessary that the situation be immediately reported using any method described in the Reporting Violations section of this document so that all federal and state notification requirements, as appropriate, may be carried out by the Compliance and QA Department. Failure to report may subject Camp Venture to fines and penalties in accordance with HIPAA. Employees that fail to follow these guidelines will be subject to appropriate disciplinary action up to, and including, termination in accordance with the Camp Venture policy found in the Employee Handbook.

Affected Individuals will:

- Treat all Camp Venture records and information as confidential.
- Protect Camp Venture information and avoid discussing or disclosing information, purposefully or inadvertently, to any unauthorized person inside or outside of Camp Venture. Employees may not share Camp Venture information with anyone, except where required for legitimate business purposes.
- Not remove Camp Venture information, records or property without permission from your supervisor or an administrator with proper authority to give such permission.
- Respect the privacy of all persons supported and hold in confidence all information obtained in the course of delivering services.
- Maintain confidentiality when storing or disposing of records containing PHI.
- Ensure that persons supported will be awarded autonomy, privacy and confidentiality.
- Never share an individual's medical information with others, except:
  - as required by law;
  - to warn of clear and immediate danger to a person or persons;
  - if subpoenaed in a civil, criminal or disciplinary action arising from the service, in which case I will disclose individual's confidences only to the extent required by the action;
  - if there is a consent of information signed by the individual concerned (or his/her legally authorized representative), I will disclose information only according to the terms of that consent;
  - to plan for persons supported care and treatment;
  - to communicate with health professionals;
  - if it is in the individual's best interest to disclose information obtained during the course of my duties; or
  - to obtain payment for services and supports provided.

## Termination from Employment

- You may not use any confidential gained from your employment with Camp Venture for you or another company's benefit. You may not take copies of any reports, documents or any other property belonging to Camp Venture.
- Upon termination of employment, you must return all Camp Venture property including, but not limited to, copies of documents, notes, and other records; Camp Venture ID, keys, cell phone, electronic equipment and credit cards.

## Information Security

- You are responsible for properly using information stored and produced by all Camp Venture computer systems.
- Computers, Internet access, email, or other office communications systems are intended for business-related purposes only.
- Do not share you system user name or password with another person or allow another person to access the computer with your password.
- All employees, Executives and independent contractors are required to comply with Camp Venture Information Technology Security policies and procedures.

## **Employment Environment**

Camp Venture is committed to creating a safe and professional workplace where employees and others are treated with respect without regard to their race, color, religion, gender, sexual orientation, marital status, age, national origin, disability or veteran status or any other basis protected by federal, state and local laws. Business integrity, teamwork, trust and respect are Camp Venture's most important values.

Camp Venture prohibits discrimination and all forms of harassment due to a person's race, color, religion, gender, sexual orientation, marital status, age, national origin, disability or veteran status or any other basis protected by federal, state and local laws.

Sexual harassment is prohibited. Sexual harassment includes any form of unwelcomed sexual advance, request for sexual favors or other verbal or physical conduct of a sexual or sex-based nature.

Violations of Camp Venture policies with respect to discrimination and harassment will be treated with the utmost gravity and will result in immediate discharge from employment if substantiated.

Employees, Executives, Board members, independent contractors, volunteers, interns and vendors will:

- Not discriminate against anyone based on gender, age, disability, race, religion, national origin, marital status, sexual orientation, or any other legally protected status.
- Treat all people supported with dignity and respect being aware of cultural differences and promote dignity, empowerment and inclusion.
- Acknowledge that all people are unique and diverse and being sensitive to diverse cultural backgrounds is essential to excellent quality service and a strong knowledgeable team to provide that service.
- Be committed to the principles of equal employment opportunity and compliance with all federal, state and local laws concerning discrimination in employment. This includes decisions about hiring, placement, assignment of duties, training, promotion, termination, compensation or benefits.
- Commit to a safe and professional workplace.

## **Gifts, Gratuities and Business Courtesies**

Camp Venture is committed to competing solely on the quality of services it provides. We strive to avoid any actions that create a perception that favorable treatment of outside entities. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom Camp Venture does or may do business. You will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies of Camp Venture, or would cause embarrassment or reflect negatively on Camp Venture's reputation.

Conducting business with providers, vendors, suppliers, the people we serve and competitors may pose ethical problems. Camp Venture employees and affiliated representatives are expected to deal fairly with providers, vendors, suppliers, the people we support and their families.

Camp Venture employees shall not encourage or request personal gifts, monetary tips, or other benefits from persons with whom we have, or may have, a direct care relationship. An individual or family member is not expected to provide gifts to an employee in order to receive good care. Conversely, Camp Venture will not accept a gift from an individual or family member intended to influence the care and services provided.

Individual gift offers must be politely declined or brought to the attention of your supervisor to determine the appropriateness of acceptance. Camp Venture has a \$35.00 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. Refer to the Employee Handbook for additional information. Please contact the Compliance and QA Department with any questions or concerns.

During the holidays, if suppliers or vendors provide nominally valued gifts, such as perishable food items and candies for the benefit of a group, these may be accepted provided they are unsolicited.

## **Business Courtesies, Kickbacks, Referrals and Bribes**

Camp Venture shall conduct business with its suppliers and vendors on the basis of fair market price, quality, service and the needs of the Agency. Camp Venture Board members, Executives and employees involved in the purchasing of goods or services on behalf of Camp Venture are prohibited from soliciting gifts, gratuities or personal benefits from the supplier or vendor. Likewise, they must decline any offer of a direct or indirect personal benefit from a supplier or vendor.

The giving of cash or cash equivalent gifts to referral services in exchange for a referral of business, is prohibited. Business courtesies (i.e., entertainment, meals, lodging, etc.) for or from independent contractors, vendors, suppliers or referral services have the potential of putting Camp Venture at risk of violating federal anti-kickback laws. Such business courtesies must receive supervisory approval before being offered or accepted. Approval will not be given to any business courtesy construed as a referral fee, bribe, kickback, or payoff of any sort.

Approved business courtesies must not place liability on Camp Venture or lead to reputational harm or embarrassment.

Applicable laws/regulations include, but are not limited to:

1. Anti-Kickback Statute (42 U.S.C. § 1320a-7b(b))
2. Physician Self-Referral ("Stark") Statute (42 U.S.C. § 1395nn))

## **Agreements with Independent Contractors and Vendors**

Camp Venture must assure that any agreements with independent 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 standards and must equal the value of the services rendered.

## **Fair Business Dealings**

Camp Venture is committed to achieving its success by fair and ethical means. Camp Venture prohibits any unethical, non-competitive and illegal business practices. Affected Individuals must not take unfair advantage with anyone through manipulation or concealment of information, abuse of confidential information, misrepresentation of facts or any other unfair business practice.

Camp Venture selects contractors, suppliers and vendors based on quality, price, delivery, technical and service excellence. Selections must not be made based on personal or self-serving relationships but rather, based on the needs of Camp Venture.

## **Adherence to Tax-Exempt Requirements**

Camp Venture is a tax-exempt entity. To comply with applicable laws, Camp Venture must operate for the benefit of the community and must avoid what the tax law calls “private inurement”, and “private benefit”. All non-tax-exempt individuals or entities must pay fair market value for use of services or property and cannot use Camp Venture’s tax –exempt status for personal benefit. Violation of the tax law can give rise to criminal penalties.

Camp Venture sales tax exemption may be used only for legitimate Camp Venture business or activities. Personal items cannot be purchased through Camp Venture, even if you reimburse Camp Venture. All appropriate taxes must be withheld from Camp Venture employee wages.

## **Fundraising**

Only fundraising or solicitation of funds that results in a benefit to Camp Venture is permitted. Other fundraising events not related to the mission, goals and mandates of the Camp Venture must be specifically authorized by the Chief Executive Officer or designee.

All fundraising and solicitation activities must be reported to, and coordinated through, the Chief Executive Officer and the Camp Venture Foundation.

## **Political Participation/Government Relations**

As a tax-exempt not-for-profit, Camp Venture is prohibited from directly or indirectly participating in any political campaign on behalf of, or in opposition to, any candidate for elective office. Violation of this prohibition could result in the revocation of Camp Venture’s tax-exempt status. Examples of violations include, but are not limited to:

- Using Camp Venture funds to publish materials that support or oppose a candidate;
- Using Camp Venture funds or resources, including your work time, for political contributions or activities;



- Publicly supporting or opposing a political candidate while acting as a Camp Venture representative.

Laws and regulation prohibit a “substantial” amount of lobbying. There are allowances for Camp Venture to advocate its position on public issues. To assure that Camp Venture does not violate any laws or regulations, or risk losing its tax-exempt status, you must seek prior approval from the Chief Compliance Officer before engaging in lobbying activities.

## **Maintenance of Records**

Employees, Executives, Board members and independent contractors:

- Must record and report all Agency, individuals supported and financial information fully, accurately and honestly. Records include, but are not limited to, records of 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. All actual or suspected fraud or other misconduct must be reported to the Chief Compliance Officer immediately.
- Will not omit or conceal any relevant information including financial or non-financial information that could impact Camp Venture’s internal or external reports and other communication.
- Will not falsify personal credentials, documents or certifications required by the Agency and/or regulatory authorities.
- Must always comply with legal and regulatory requirements and Camp Venture policies governing the retention, disposal, or destruction of records of, or pertaining to, Camp Venture and are prohibited from destroying records pertaining to litigation or government investigations or audit without express written approval of the Chief Compliance Officer.

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

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

Any employee, Executive, Board member, independent contractor, volunteer, intern or vendor who violates or knowingly fails to report any violation of this Code of Ethics or any other violation of law or regulation or Agency policy and procedure, is subject to appropriate disciplinary action, up to and including, termination of employment or affiliation with the Agency (Employees – refer to the Employee Handbook for additional policy information).

## **Seeking Guidance and Reporting Violations**

Affected Individuals must report any actual or suspected violations of this Code of Ethics, or of any applicable law or regulation, or of any Agency policy and procedure to their immediate supervisor/manager or to the Chief Compliance Officer or designee.

We are each responsible for reporting, in good faith, potential wrong-doing and/or non-compliance with regulations or policies.

All reported concerns will be taken seriously and the process of investigating all matters will be handled with professionalism and confidentiality. Investigations will be conducted discreetly with the intended purpose of identifying any possible violation or non-compliance. It is not acceptable to overlook actual or potential wrong-doing and all integrity concerns should be pursued until addressed appropriately.

All suspected or actual violations of the Code of Ethics must be reported to the Chief Compliance Officer:

Alice Kayser LMSW, MPA  
25 Smith Street  
Suite 510  
Nanuet, NY 10954  
845-624-5407

Additionally, Camp Venture has provided 4 alternative ways to report violations:

You can **CALL**:

Camp Venture's Confidential Compliance Hotline at 845-624-4039

You can send an **EMAIL** to:

[compliance@campventure.org](mailto:compliance@campventure.org)

By **MAIL** to:

Chief Compliance Officer

Camp Venture, Inc.

25 Smith Street

Suite 512

Nanuet, NY 10954

**ANONYMOUSLY** by completing the ANONYMOUS REPORTING FORM located on the Agency website.

Place in a secure envelope, marked "Confidential" addressed to:

Compliance & QA Department

Camp Venture, Inc.

25 Smith Street

Suite 510

Nanuet, NY 10954