

CENTRAL NEW YORK CNY QUEST COMPLIANCE STANDARDS OF CONDUCT

Revised and Adopted: May 31, 2024

Our Mission Statement:

Our mission is to enrich the lives of people with developmental, intellectual, and mental health disorders. We are dedicated to helping every individual we serve achieve their goals and live as independently as possible. We treat everyone we serve with respect and compassion and recognize individuals with special needs as valuable members of the community.

Standards of Conduct:

Central New York Quest, Inc. (CNY Quest) is committed to operating in a manner that demonstrates strong ethics and accountability. CNY Quest has adopted these Standards of Conduct to protect and promote honesty and to improve CNY Quest's ability to achieve its mission.

As part of this commitment, CNY Quest has a Corporate Compliance Program. An important part of the program is CNY Quest's Compliance Standards of Conduct, which apply to all CNY Quest employees, volunteers, Chief Executive Officer (CEO), contractors, agents, subcontractors, independent contractors, and Board of Director members (collectively "personnel").

The Standards of Conduct cannot include all legal and ethical standards, and it is not a substitute for using good judgment and a sense of honesty and fairness.

We pledge to abide by the laws and regulations and CNY Quest Policies and procedures including but not limited to those related to Central New York Quest, Inc's Corporate Compliance Plan. Activity contrary to these standards of conduct is a violation of the compliance program and related policies and procedures. All personnel must follow the below Standards of Conduct:

1. Personnel will work in accordance with applicable laws, regulations, and agency policies.
2. Personnel will place the interest of clients they serve and their family members first and foremost in all respects of what they do.
3. Personnel will work cooperatively and respectfully with CNY Quest, employees, Board members and agents to provide the highest quality services.
4. Personnel will not cover up a deficiency or error.
5. Personnel involved in billing and/or coding of claims will take every reasonable precaution to make sure their work is accurate, timely, and in compliance with federal and state laws and regulations and CNY Quest policies. Thorough billing records must be maintained. Personnel responsible for billing will only bill for services provided and fully documented in the client's service records. If the service must be coded, only billing codes describing the services provided will be used

6. Personnel will not falsify records, including credentials, timesheets, reimbursement forms, and training forms. No claim for payment or reimbursement of any kind that is false, fraudulent, inaccurate, or fictitious may be submitted. Falsification of medical, time or other records that are used as the basis for submitting claims will not be tolerated.
7. Personnel understand that falsification of hours worked may constitute Medicaid fraud and that submitting false time could result in civil and criminal penalties, payroll deductions and court proceedings.
8. Personnel will be responsible for avoiding any activities that may be interpreted as waste, fraud, or abuse.
9. Personnel will only provide services to one client at a time unless they have been approved by CNY Quest to provide the service in a group setting.
10. Personnel who work for more than one agency are prohibited from rendering services to two clients from different agencies simultaneously. This practice is not allowed under Medicaid guidelines and could result in severe consequences for both the staff and our organization.
11. Personnel must make sure that all records and other personal information regarding clients and employees are treated as confidential and used professionally, regardless of the way the information is received or stored.
12. Personnel will not use confidential information related to the agency, clients, or employees for personal gain or to cause harm to the person.
13. Upon termination of employment with CNY Quest, all employees will maintain all confidential information gained while employed at CNY Quest
14. Personnel must avoid conflict of interest, including the acceptance of gifts or giving gifts.
15. Personnel must be completely honest in all interactions with government agencies and representatives.
16. Personnel may not alter, destroy, conceal, cover-up, falsify, or make false entries in any record with the intent to impede, obstruct, or influence any governmental department or agency's investigation.
17. Personnel must not have any financial or other personal interest in a transaction between CNY Quest and a vendor, supplier, provider, or customer.
18. Personnel must not engage in financial, business, or other activity which competes with CNY Quest's business or interferes with the performance of the personnel's job duties.
19. Personnel must notify the Corporate Compliance Office of any contracts or agreements with physicians, health care businesses, patients, providers, third party payors, vendors, or suppliers to CNY Quest
20. Personnel must follow all antitrust laws and may not engage in discussions or agreements with competitors regarding pricing, prices paid to suppliers or providers, or joint actions or boycotts.
21. Personnel are responsible for following safe work practices and complying with all applicable safety standards and health regulations.
22. Personnel will report any unethical or illegal conduct to the Corporate Compliance Officer.
23. Personnel will seek training and assistance in areas that would strengthen the ability to fulfill their responsibilities to the clients and to the agency.

Reporting Violations: All personnel are responsible for immediately reporting all suspected violations of these Standards of Conduct, the Compliance guidelines, operational policies, and laws and regulations. A failure to report a violation of any of the above is a violation of the Compliance Standards of Conduct. Failure to report may result in discipline, up to and including termination of employment. CNY Quest does not permit any action of retaliation to be taken against an employee who reports a violation of law, regulation, standard, procedure, or policy.

Personnel may report violations or suspected violations by contacting the Corporate Compliance Officer (CCO) through any of the following ways:

1. Open Communication with the CCO. Personnel may contact CNY Quest's CCO directly either in person or by telephone at (315) 732-3435 ext. 236. Please note that open communication with the CCO is not an anonymous form of communication.
2. E-mail. Personnel may also e-mail the CCO at jenny.dempsey@cnyquest.com. Please note that e-mail is not an anonymous form of communication.
3. Anonymous Hotline. CNY Quest maintains a 24-hour, anonymous hotline for reporting complaints or asking CNY Quest about compliance issue(s). The anonymous hotline number is (315) 732-3435 ext. 255. The hotline is accessible only by the CCO.
4. Anonymous Mail. Personnel may submit anonymous complaints in writing by mailing a letter to the CCO: CNY Quest, Attn: Jennifer Culver, 4713 Crossroads Park Drive, Suite 501 Liverpool, NY 13088.

In addition to reporting to the CCO, Personnel may also report violations or suspected violations to their supervisor directly.

All compliance-related reports will be kept confidential, whether confidentiality is requested, unless the matter is subject to a disciplinary proceeding, referred to or under investigation by Office of Medicaid Inspector General (OMIG) or law enforcement, or the disclosure is required during a legal proceeding.

It is CNY Quest's policy to investigate all reports of illegal, improper, or fraudulent activities. All Personnel must cooperate with internal investigations and must not prevent, hinder, or delay the discovery of improper or illegal conduct or violations. Failure to comply with any of the above may result in corrective action under CNY Quest's disciplinary policy, up to and including termination of employment in the case of employees. For contractors, agents, subcontractors, and independent contractors, action can include written warning, financial penalties, and/or termination of the contractor's relationship with CNY Quest in accordance with the contract or agreement. For Board of Directors, penalties may include written warning and/or removal in accordance with bylaws, laws, and regulations.