



CLC Group Standards of Conduct

Mission and Values

CLC Group is committed to providing the finest possible innovative programming consisting of a multitude of services including residential, day habilitation, therapeutic, and community-based supports to people with intellectual and developmental disabilities. CLC Group values our continued strive to always act in the best interests of the people we support and their service needs.

Intent

CLC Group's (herein after referred to as "CLCG" or "the Agency") Standards of Conduct apply to all Affected Individuals. The term "Affected Individuals" applies to All Employees, which also includes Chief Executives, Executive Directors, Senior Leadership, Board members, Affiliates, and Contractors.

The Standards of Conduct were approved by CLC Group's Board of Directors. This document is a formal statement of the Agency's commitment to the standards and rules of ethical conduct.

CLC Group is committed to compliance with all applicable Federal and State laws and the prevention of unethical, improper, or unlawful behavior or acts in the delivery and billing of services, and prevention and detection of fraud, waste and abuse. CLCG is committed to stopping such behavior as soon as possible after discovery, and to discipline those persons involved in such behavior or acts, including those who fail to report a violation.

All Affected Individuals, as defined above, must comply with the Standards of Conduct, immediately report any alleged violations of wrongdoing, and assist Management and the Compliance Officer in investigating allegations of wrongdoing.



While the standards addressed in this document are intended to guide Affected Individuals in their daily responsibilities, they do not replace any Agency policies and procedures. There may be instances not addressed by the Standards of Conduct or existing policies and procedures, or there may be activities that seem to conflict with the Standards. Affected Individuals must seek direction from their supervisor, other Management staff, or the Compliance Officer in these instances.

Ethics

It is the policy of CLC Group to comply with all laws and regulations applicable to its business and to conduct business with the highest degree of integrity. To accomplish this, all Affected Individuals must obey the laws and regulations that govern their work and always act in the best interest of those who receive services and their families (collectively referred to as people receiving support or service recipients) and the Agency.

Guidelines for Affected Individuals: Ethics

- 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 receiving support, other providers, suppliers, and all others with whom the Agency does business.

Conflict of Interest

For purposes of this section on conflict of interest, an immediate family member is any person who is related by blood or marriage, or whose relationship with the Affected Individual is similar to that of persons who are related by blood or marriage. An immediate family member of a person includes:

- The person's spouse;
- Natural or adoptive parent, child, or sibling;
- Stepparent, stepchild, stepbrother, or stepsister;
- Father-in-law, mother-in-law; son-in-law; daughter-in-law; brother-in-law; or sister-in-law;
- Grandparent or grandchild; and
- Spouse of a grandparent or grandchild.



Affected Individuals may not engage in any conduct that conflicts – or is perceived to conflict – with the best interest of the Agency. You must not allow any outside financial interest or competing personal interest to influence your decisions or actions taken on behalf of the Agency. This means that you or your immediate family should not personally benefit from doing business with CLCG, should not have independent relationships with those who deal with the Agency, should not use Agency property for personal benefit, and should not compete with the Agency.

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

Affected Individuals must disclose any circumstances where the employee or their immediate family member is an employee, consultant, owner, contractor, or investor in any entity that (i) engages in any business or maintains any relationship with the Agency; (ii) provides to, or receives from, the Agency any referrals of people supported; or (iii) competes with the Agency.

If you have a potential conflict, you must make full disclosure to the Compliance Officer, members of Management and the Board, as appropriate. You will be provided with actions that may be necessary to address or prevent conflict of interest.

Guidelines for Affected Individuals: Conflict of Interest

It is a conflict of interest for you to personally take for yourself opportunities that are discovered through the use of CLCG's property, information, or your position with the Agency; to use the Agency's 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 conflict 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 CLC Group in your everyday 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 service recipients. You may not compete against CLC Group, work for its competitors, 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 people receiving support. Assets include not only funds, equipment, inventory, and office supplies, but also concepts, business plans and strategies, information about people supported, 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.
- Property and resources of the Agency should only be used for the benefit of the Agency or the people receiving support.

Maintenance of Records

Employees and independent contractors must record and report all information related to CLC Group and its operations, its service recipients, and financial information fully, accurately, and honestly. Records include, but are not limited to, records of the service recipients, 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 and independent contractors must not omit or conceal any relevant information.

Guidelines for Employees and Independent Contractors: Recordkeeping

Many of the Agency's 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 in which you were involved.

Employees and independent contractors are expected to maintain complete, accurate, and contemporaneous (timely) records as required by the Agency. The term "records" includes all documents, both written and electronic, that relate to the provision of CLCG's services or provide support for the billing of CLCG's services. Records must reflect the actual service provided.



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. Any records to be appropriately altered must reflect the date of the alteration, the name, signature, and title of the person altering the document, and the reason for the alteration, if not apparent.
- You may not sign the name of another person to any document.
- Signature stamps may not be used.
- You may not create or participate in the creation of any records that are intended to mislead or to conceal any action that is improper.
- Backdating and predating documents is not prohibited.

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, 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 CLC Group's policy.
- You may not destroy records pertaining to any legal action or government investigations or audit without written approval of the Compliance Officer.

Protection of Confidential Information

During your employment, contract, or association with CLC Group, you may acquire confidential information about the Agency, its staff, and service recipients which must be handled in strict confidence and not discussed with outsiders. The protection of confidential business, employee, and service recipient information is very important. Violations may result in fines and penalties, legal action, or criminal charges.



The Agency has developed policies and procedures to assure that the confidentiality of CLCG's information and information about people receiving support is protected and released only with the appropriate authorization or for lawful reasons. All Affected Individuals are required to comply with CLCG'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 Affected Individuals: Confidentiality

You must treat all the Agency's records and information as confidential.

You may not release confidential information without the proper authorization. Confidential information includes not only information about service recipients 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 the people receiving support if released.

You must protect CLCG's information and avoid discussing or disclosing the Agency's information, purposefully or inadvertently (through casual conversation), to any unauthorized person inside or outside the Agency. Furthermore, staff may not share confidential information about the Agency with anyone, except where required for a legitimate business purpose. Ask your supervisor if you are not sure whether certain information is confidential.

CLC Group's information may not be removed from the Agency's property without permission from a supervisor or administrator with proper authority over the information.

Termination of Employment or Contract

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



Information Security

Guidelines for Affected Individuals: Information Security and Technology

- You are responsible for properly using information stored and produced by all the Agency's computer systems.
- Computers, internet access, email, or other office communication 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 username or password with another person or allow another to access the computer with your password or log-on information.
- All Affected Individuals are required to comply with CLC Group's Computer Policy. If you have any questions concerning information security, contact your immediate supervisor or Compliance Officer.

Fair Dealing

Business Dealings and Referrals

CLC Group will not be inappropriately influenced with goods or services from any business in which Affected Individuals and their immediate family members have a substantial interest.

Conducting business with providers, contractors, suppliers, service recipients, and competitors may pose ethical, and sometimes legal, problems. Affected Individuals are expected to deal fairly with providers, contractors, service recipients and competitors.

As defined in the Conflict of Interest Policy, and for purposes of these Standards of Conduct, an immediate family member is any person who is related by blood or marriage, or whose relationship with the Affected Individual is similar to that of persons who are related by blood or marriage. An immediate family member of a person includes:

- The person's spouse;
- Natural or adoptive parent, child, or sibling;
- Stepparent, stepchild, stepbrother, or stepsister;
- Father-in-law, mother-in-law; son-in-law; daughter-in-law; brother-in-law; or sister-in-law;
- Grandparent or grandchild; and
- Spouse of a grandparent or grandchild.



Guidelines for Affected Individuals: Fair Dealing

The Standards 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 forms are prohibited. They are not only unethical, but also in many cases illegal.

Gifts and Gratuities and Entertainment

- Affected Individuals may not without permission of the Compliance Officer accept, solicit, or offer anything of value from anyone doing business with the Agency.
- Under no circumstances may an employee or immediate family member of an employee accept a cash gift or gratuity from a person receiving support, a family member or friend of a person supported, or a vendor or potential vendor. Any Affected Individual who gives or accepts such a cash gift or gratuity will be subject to disciplinary action, including termination of contract, assignment or engagement with CLC Group.
- You may not solicit money, gifts, gratuity, or any other personal benefits or favors of any kind from providers, contractors, accounts, or service recipients 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

CLC Group must ensure 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 service(s) rendered or items purchased.

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.



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.

Federal and State Programs

CLC Group is committed to complying with the laws and regulations that govern the Federal and State programs that it administers. The Compliance Program, these Standards of Conduct, and policies and procedures are developed to provide guidance in your day-to-day work and activities you perform on behalf of the Agency. You must abide by the policies and procedures and the Standards set by the Agency.

CLC Group’s programs and services are largely funded by Federal and State healthcare programs, including Medicaid and Medicare. CLCG is committed to full compliance with all Federal and State healthcare program requirements. CLCG must also comply with laws and regulations designed to combat fraud, waste, and abuse and the submission of inaccurate or false claims.

CLC Group has put in place procedures and practices to ensure that:

- All service documentation, records, and reports are prepared timely, accurately, and honestly.
- All documentation supporting claims for service is complete and maintained in accordance with regulatory requirements and the Agency’s policies.
- All claims submitted to any government or private healthcare program are accurate and comply with all Federal and State laws and regulations and payer requirements.
- Claims are only submitted for medically necessary services provided by eligible providers.
- All claims are properly documented and accurately coded.
- Billing errors are promptly identified and any payments received in error are promptly returned to the payer.

Employees and independent contractors responsible for the documentation, charging, coding, billing, and accounting of services must comply with all applicable State and Federal regulations CLCG’s policies and procedures.

It is against the law and CLC Group’s policies to knowingly or carelessly submit a false claim. Submitting a false claim includes using false records, using the wrong code, double billing, or billing or causing to be billed services that are not provided or fully documented, and billing for services that are not medically necessary.

All Affected Individuals have a responsibility to notify the Compliance Officer promptly if they are charged with a criminal offense related to healthcare or are proposed or found to be subject to exclusion from Federal or State healthcare programs.



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 to an individual employed by or associated with CLCG. All Affected Individuals must report any requests for information or cooperation with an investigation to the Chief Executive and Compliance Officer immediately.

Employment Environment

CLC Group is committed to creating a safe and professional workplace where Affected Individuals 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 CLCG's most important values. Unlawful discrimination or harassment of any sort violates these values. All Affected Individuals must exhibit and promote respect, integrity, trust, and teamwork in the workplace and must comply with the Agency's policies prohibiting discrimination and harassment in all facets of CLCG's work.

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

All Affected Individuals are prohibited from joking about another person'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.

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

All Affected Individuals must report any suspected fraud, waste, and abuse; illegal or unethical acts; actual or suspected violations of Federal or State laws and regulations; actual or suspected violations of the Standards of Conduct, the Compliance Program and CLC Group's policies and procedures; improper acts in the delivery or billing of services; and other wrongdoing (collectively referred to as "compliance concerns") to their immediate supervisor, member of Management, Compliance Committee member or the Compliance Officer. A Compliance Hotline is also available for confidential or anonymous reporting of such issues. The Compliance Hotline number is (914)222-0178. You may also send a confidential email to the Compliance Hotline Mailbox at Compliance@clcgroup.org.

When actual or suspected noncompliance is reported to any Affected Individual, it must be promptly referred to the Compliance Officer. Steps will be taken to protect the confidentiality and anonymity of the reporters. CLC Group will not tolerate any form of retaliation or intimidation against a person who makes a good-faith report in accordance with the Standards of Conduct and its Compliance Program.

All Affected Individuals must cooperate fully and honestly in any investigation into reported noncompliance.

Corrective Action and/or Discipline

Affected Individuals found to have engaged in non-compliant activity or wrongdoing addressed in these Standards of Conduct will be subject to appropriate disciplinary action, up to and including termination of employment, contract, assignment, or association with CLC Group.

Affected Individuals who knowingly fail to report compliance concerns are subject to appropriate disciplinary action, up to and including termination of employment, contract, assignment, or association with CLCG.

Employees may face disciplinary action ranging from a verbal warning to suspension or termination, depending on the incident and the relevant surrounding circumstances. A more significant level of discipline will be taken for intentional or reckless behavior.

Your Responsibilities

- ✓ Attend required training, and read and understand CLCG's Compliance Plan, Compliance Program Policies and Procedures, and Standards of Conduct.
- ✓ Follow CLCG's Standards 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 CLCG's Standards of Conduct, Compliance Program, policies and procedures, guidelines, and/or Federal and State laws and regulations.
- ✓ Promptly report any questions, issues, compliance concerns, wrongdoing, violations, or suspected violations to your supervisor, another member of Management, a member of the Compliance Committee, or the Compliance Officer.