

Compliance Program Code of Conduct

Purpose

Search for Change is committed to providing high quality services that comply with the regulations and laws that are applicable to our work. The Code of Conduct is intended to provide guidance to all members of the Search for Change “Community” which includes agency employees, management members, board members, vendors, subcontractors, and other affected individuals on their personal, professional, ethical, and organizational responsibilities. The Code of Conduct is not intended to be an exhaustive list of expectations. Because the Code of Conduct cannot cover every expectation, you have a duty to determine how you should behave by consulting applicable regulations, following the agency’s policies and procedures, and/or contacting the agency’s Compliance Officer, Crystal Meyer, or any member of the Corporate Compliance Committee.

Agency Mission

Search for Change is dedicated to improving the quality of life and increasing the self-sufficiency of individuals with emotional, social and economic barriers throughout Westchester, Putnam, and Fairfield counties. This is accomplished by providing the direct support and assistance needed to enable individuals to reach their full potential.

Search for Change is committed to assisting people with mental illnesses in their quest for dignity and independence. Clients direct every aspect of their rehabilitation, including planning for change, choosing goals, acquiring skills, and accomplishing objectives. Consideration is given to each individual’s strengths, talents, opinions, values, dreams, and ability to make choices. We recognize and use these qualities to assist individuals in overcoming and managing the symptoms of mental illness.

We teach the skills needed to choose, obtain and maintain desirable housing, meaningful employment, higher education and productive relationships with family and friends. Our programs and services are focused on individual choices, needs, interests and abilities. Dedicated staffs are available twenty-four hours a day, three hundred sixty-five days a year to provide support and care to the individuals we serve and their families.

Policy

Search for Change is committed to our mission and to the agency’s continued success. In making decisions in our daily business practices, personal values and honesty are factors that play a significant role in guiding us. Everyone in the SfC Community has the responsibility to (1) evaluate how our actions affect the integrity and values of SfC as a whole and (2) ensure that our conduct reflects our values of doing the right thing, telling the truth and treating each other and our clients with compassion and respect.

Search for Change is committed to the highest standards of business and professional ethics. To ensure that each Search for Change employee upholds this commitment, we have developed a Corporate Compliance Program. The Corporate Compliance Program written components consist of the Search for Change Code of Conduct, and the Corporate Compliance Policy and Procedure Manual. Search for Change developed this mandatory Code of Conduct and the Compliance Program to provide guidance on behavior

consistent with applicable federal and state regulations, laws, and standards that govern our operations and provision of services, this includes but is not limited to the OIG, the OMIG, the DRA, the OCR, and False Claims Act.

Search for Change's Director of Human Resources will provide you a copy of the current Code of Conduct upon hire and annually thereafter; you will be required to sign a statement acknowledging that you received the Code of Conduct and understand it each year. In addition to your initial orientation when hired, you will be trained on the Code of Conduct and Corporate Compliance Program no less frequently than annually. The Code of Conduct is also readily accessible on the agency server and website.

The Compliance Committee reviews the Code of Conduct annually and makes revisions as needed. All employees will be required to attest to the current Code of Conduct annually via a signed statement of acknowledgment. All signed acknowledgment statements are retained in the employee personnel files by the Director of HR.

Procedures

- The Corporate Compliance Committee is responsible for developing the Code of Conduct, reviewing it annually, and making updates as needed based on changes in guidance, regulations, or publications.
- The Board of Directors must approve the Code of Conduct and any updates or modifications.
- The Code of Conduct and other Compliance Policies and Procedures, includes guidance on high risk areas identified by Search for Change as well as billing, governance, credentialing, financial relationships, quality of care, and confidentiality. It is your responsibility to familiarize yourself with these policies and procedures.
- The Code of Conduct, along with applicable policies or other compliance aids, will be distributed by HR to all employees upon hire who must sign an acknowledgement that they have a) received the documents; b) read and understand the documents; and, c) agree to abide by the provisions of the Code. The Code of Conduct will be sent annually thereafter and all employees must attest to it annually.
- The Code of Conduct will be distributed to all independent contractors, and, as appropriate, to vendors, and subcontractors at the time their relationship with Sfc is established and annually thereafter.
- The Compliance Committee, Compliance Officer, and Director of HR are responsible for ensuring that all employees and agents receive training on the code of conduct during orientation or within 45 days of hire with Sfc and annually thereafter.
- The Compliance Officer and Compliance Committee are responsible for investigating any violations of the Code of Conduct.
- The Code of Conduct contains information on how employees must report suspected violations of the code, an affirmation of the organization's commitment to confidentiality and non-retaliation for reporters, and potential disciplinary actions that may be taken against those who violate the Code of Conduct.

Compliance Officer

The Compliance Officer, Crystal Meyer, can be reached at 914-428-5600 extension 4857 or CMeyer@searchforchange.com. You can call the Anonymous Compliance Hotline at 914-428-5600 extension 9239 if you wish to confidentially report a concern regarding any compliance issue.

Written concerns may also be made, anonymously, and mailed to: Search for Change, Inc., 400 Columbus Avenue, Suite 201E, Valhalla, NY 10595 to the attention of the Corporate Compliance Department, and labeled “confidential.”

The Compliance Officer will follow up and investigate all reports of Medicaid fraud, compliance related matters, concerns, and/or issues as described in the Compliance Program Policies and Procedures Manual.

Responsibilities of Leadership

It is the Search for Change Compliance Committee’s responsibility:

- to train every SfC employee and affected individual, vendor, or subcontractor on the contents of the Code of Conduct, the role of the Compliance Officer, and on compliance policies and procedures relevant to each employee’s duties;
- to ensure that no SfC employee will be retaliated against for reporting potential violations of any aspect of the Corporate Compliance Program;
- to discipline those who commit violations of any aspect of the Corporate Compliance Program, up to and including termination;
- to monitor the effectiveness of the Corporate Compliance Program and to modify the Program as changes occur to laws, rules and regulations and to retrain employees as those modifications are made;
- to maintain a safe and harassment-free work environment; to treat employees courteously and with respect; to ensure that employees have appropriate guidance and training to do their jobs well.

It is the responsibility of the Board of Directors to:

- attend training on the Code of Conduct, Compliance Policies and Procedures, and the Board of Directors responsibilities to ensure an effective corporate compliance program;
- receive and review Compliance Committee reports and evaluate the effectiveness of the compliance program;
- review the Compliance Officer’s annual report, quarterly reports, audit and investigation findings, and Compliance workplan.

It is your supervisor's responsibility to:

- set the tone and maintain a work environment that encourages ethical and responsible behavior;
- discuss the Corporate Compliance Program and encourage questions from you and your fellow employees;
- conduct follow-up training at individual units about the Corporate Compliance program and proper documentation
- establish an environment in which employees feel comfortable addressing compliance issues without fear of reprisal; and
- evaluate an employee's adherence to the Corporate Compliance Program as part of the annual performance review.

Your Individual Responsibilities

It is your responsibility to:

- know and follow the rules and regulations that govern your job;
- attend the agency mandatory Compliance Training annually;
- refrain from committing Medicaid fraud, waste, or abuse either directly or indirectly; complete all billing documentation according to required standards and protocols,
- comply with the Corporate Compliance Program by:
 - Reporting suspected problems
 - Refraining from participating in non-compliant behavior
 - Refraining from encouraging, directing, facilitating or permitting either actively or passively non-compliant behavior.
- report any actual or potential Medicaid fraud, violations of the law, the Code of Conduct, or policies and procedures;
- submit accurate, complete, and truthful records of your hours, including any written documentation required to support the services you provided;
- treat your fellow employees and each Search for Change client with respect and dignity;
- maintain the privacy and security of client information and information related to Search for Change's business operations. This responsibility extends past the end of your employment with Search for Change, Inc.;

- safeguard Search for Change computer records by maintaining the confidentiality of your password and restricting access to the computer system only to authorized persons;
- avoid putting yourself in a position in which your own personal interests and those of Search for Change are in conflict or which might interfere with the ethical performance of your job responsibilities;
- refrain from giving or accepting any form of gift or gratuity that might influence, or appear to influence, yours or another person's judgment in the performance of job duties;
- refrain from offering or receiving anything of value to induce another person to purchase an item or service from Search for Change, to refer a client to SfC, or to market SfC services;
- refrain from making misrepresentations, dishonest statements, or statements intended to mislead or misinform clients about the quality of services or those of a competitor;
- refrain from using any information you obtain on the job that is not readily available to the general public, for personal gain (You must also refrain from making unauthorized disclosures of information that might damage Search for Change or its employees and contractors);
- never discriminate against or harass anyone on the basis of race, religion, sex, age, national origin, sexual orientation or affectation, disability, or any other protected characteristic;
- refrain from using Search for Change property or services for personal gain or benefit; you may not remove or dispose of Search for Change's materials, supplies or equipment without proper authority; and
- tell the truth and cooperate with any investigation of a potential compliance or other legal matter, whether investigated by SfC representatives or government authorities.

Responsibilities to our Clients and Program Participants

Providing high quality services is a primary objective of Search for Change, Inc. Whether an individual has direct client care responsibilities or an indirect impact on client care, this commitment to serving the needs and best interests of our clients should guide all business decisions. In discharging these responsibilities, the safety and well-being of each client must be given the highest consideration.

Every Search for Change client or participant who receives services shall be:

- treated as an individual, with respect given to his or her dignity, autonomy, and self-esteem, with the same high quality and cost-effective treatment provided regardless of payment source or level of reimbursement;
- without distinction in admission, transfer, or discharge activities based on race, sex, religion, age, sexual orientation, disability, national origin, or any other characteristic protected by law of the client;

- assured that Search for Change complies with all Federal and State laws and regulations regarding client rights, including the right to participate in their care, the right to freedom of choice in decisions regarding care and its provision and anticipated cost, the right to receive full and accurate information regarding the proposed treatment, the right to give informed consent to such treatment, the right to maintain confidentiality of their protected health information, and the right to complete an advance directive regarding their care; and
- cared for in accordance with the client's goals established with the staff. Employees will communicate with the fellow staff about the client's response to rehabilitation and changes in the client's status, altering the plan of treatment as appropriate with such changes.
- Properly licensed, credentialed and/or skilled professional and para-professional employees shall care for each client. Each client shall be informed of the reasons for any recommended service, and methods used to accomplish the service, and necessary follow-up required of family members or other caregivers.

Disciplinary Action

All employee's will be subject to Search for Change's Disciplinary Policy for failure to comply with the Code of Conduct and/or Compliance Policies and Procedures. This may include issuance of a verbal or written warning that may be imposed depending upon the nature of the conduct, suspension, and/or termination.

Failure to comply the Code of Conduct and/or Compliance Program may result in the termination of the relationship and/or contract with affected vendors and third-party contractors.

Department: Corporate Compliance
Date Established: 12/2009
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Last Revised: 9/2022

Compliance Program Code of Conduct Attestation Form

I hereby acknowledge that I have received and affirmatively state that I have reviewed and understand Search for Change's Compliance Code of Conduct. I agree to comply with the standards contained in the code and all related policies and procedures as is required as part of my continued employment or association with the organization.

I understand that should I have any questions about the code or how it is applied in practice, I may contact my supervisor, any member of the Compliance Committee, or the Compliance Officer, Crystal Meyer, at 914-428-5600 ext. 4857 or CMeyer@searchforchange.com directly for assistance.

I acknowledge the code is only a statement of principles for individual and business conduct and does not constitute a contract of employment. I understand I am required to promptly report any potential violation of the code that I become aware of to my supervisor, the Compliance Hotline (914-428-5600 ext. 9239), or to the Compliance Officer directly.

I understand that any violation of the Code of Conduct or any compliance policy or procedure may be grounds for disciplinary action, up to and including discharge from employment or termination of vendor contract/business relationship.

Name (please print) _____

Signature _____

Date _____