



## Concern Housing Standards of Conduct

### Mission and Values

**Concern Housing's** (sometimes referred to as "Organization" or "the Organization") Standards of Conduct (the Standards) apply to all Affected Individuals. The term "Affected Individuals" includes all persons who are affected by the required provider's risk areas including the required provider's employees, interns, volunteers, the Executive Director and other senior administrators, managers, contractors, agents, subcontractors, independent contractors, and governing body and corporate officers.

Concern Housing is a non-profit agency committed to helping individuals and families to live in the community with dignity and enhanced opportunities through the provision of housing and support services.

### Concern Housing Values:

Concern is committed to the application of high ethical standards in the conduct of its business. Employees and affiliates Staff of Concern must strive to be:

- **Honest** and **trustworthy** in all relationships.
- **Reliable** in carrying out assignments and responsibilities.
- **Truthful** and **accurate** in what is said and written.
- **Cooperative** and **constructive** in all work undertaken.
- **Fair** and **considerate** in the treatment of fellow employees, service recipients, and all other persons.
- **Law abiding** in all activities.
- **Economical** in utilizing agency resources.
- **Committed** to protecting the privacy of individuals.

### Intent

The Standards of Conduct were approved by **Concern Housing's** Board of Directors. This document is a formal statement of the Organization's commitment to the standards and rules of ethical conduct.

**Concern Housing** 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. **Concern Housing** 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. Please note the Senior Associate Executive Director, is also the Compliance Officer.





While the standards addressed in this document are intended to guide Affected Individuals in their daily responsibilities, they do not replace any **Concern Housing** 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 **Concern Housing** 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 service recipients) and the Organization.

### 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 Organization, regulatory agencies, and internal and external auditors.
- You are expected to comply with the Organization's policies and procedures, accounting rules, and internal controls.
- You are expected to function with honesty in your work for the Organization and with service recipients, other providers, suppliers, and all others with whom the Organization does business.
- All individuals are expected to observe high standards of business and professional ethics in the discharge of their assigned responsibilities. Compliance with these standards and ethics is a condition of employment and/or affiliation with Concern. Failure to comply will result in prompt, appropriate corrective action, including the possibility of termination.
- Employees and all affected individuals are required to notify Human Resources as soon as possible if arrested. Depending upon the circumstances surrounding the arrest and charges, affected individuals may be suspended. Failure to notify Human Resources of the arrest can lead to discipline, up to and including, termination of employment or affiliation with the agency.

## 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 Organization. You must not allow any outside financial interest or competing personal interest to influence your decisions or actions taken on behalf of the Organization. This means that you or your immediate family should not personally benefit from doing business with the Organization, should not have independent relationships with those who deal with the Organization, should not use Organization property for personal benefit, and should not compete with the Organization.

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 Organization. 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 Organization; (ii) provides to, or receives from, the Organization any referrals of service recipients; or (iii) competes with the Organization.

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 the Organization's property, information, or your position with the Organization; to use the Organization's property or information for personal gain; or to compete with the Organization.

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 the Organization in your everyday life and must represent the Organization positively in the community.



- Outside employment must not conflict in any way with your responsibilities to the Organization or its service recipients. You may not compete against **Concern Housing**, work for its competitors, or have any ownership interest in a competitor.

#### Use of Organization Funds and Resources

- The Organization's assets are to only be used for the benefit of the Organization and its service recipients. Assets include not only funds, equipment, inventory, and office supplies, but also concepts, business plans and strategies, information about service recipients, financial information, computer property rights, and other business information about the Organization.
- You may not use Organization 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 Organization should only be used for the benefit of the Organization or its service recipients.

### **Maintenance of Records**

Employees and affected individuals must record and report all information related to **Concern Housing** and its operations, its service recipients, and financial information fully, accurately, timely, 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. Affected individuals must not omit or conceal any relevant information.

#### **Guidelines for Employees and Independent Contractors: Recordkeeping**

Many of the Organization 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 Organization. The term "records" includes all documents, both written and electronic, that relate to the provision of **Concern Housing** services or provide support for the billing of **Concern Housing** services. Records must reflect the actual service provided and/or task completed.



### Falsification of Records

- You must not make any false entries in any of the Organization's records or in any public record for any reason.
- You may not alter any permanent entries in the Organization'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 unless approved by the Executive Director.
- You may not create or participate in the creation of any records that are intended to mislead or to conceal anything that is improper.
- Backdating and predating documents is unacceptable.

### 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 Organization must always comply with legal and regulatory requirements and **Concern Housing** policy.
- You may not destroy records pertaining to any legal action or government investigations or audit without written approval of the Compliance Officer or Executive staff.



## Protection of Confidential Information

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

The Organization has developed policies and procedures to assure that the confidentiality of **Concern Housing** information and information about service recipients is protected and released only with the appropriate authorization or for lawful reasons. All Affected Individuals are required to comply with **Concern Housing'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 of the Organization'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 Organization that may be of use to the Organization's competitors or harmful to the Organization or its service recipients if released.

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

The Organization's information may not be removed from the Organization'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, affiliation or contract with the Organization for your benefit or another organization's benefit. You may not take copies of any reports, documents, or any other property belonging to the Organization.
- Upon termination of employment, affiliation or contract with the Organization, you must return all of the Organization'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 Organization'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 **Concern Housing's** IT Policies and Procedures. If you have any questions concerning information security, contact your immediate supervisor or Compliance Officer.

## Fair Dealing

### Business Dealings and Referrals

**Concern Housing** 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**

- Gifts can never be given or received for the purpose of influencing the business decision of the recipient. Reasonable and customary business practices are generally limited to providing entertainment and gifts of nominal value, such as a meal, ticket to an event, and similar gift items, on an occasional basis pursuant to agency policies and procedures. An appearance of impropriety or undue influence is created when such items are offered and accepted with frequency or are of significant value. The timing of the gift offered also makes a difference as to whether it is appropriate or inappropriate.
- Staff and affiliates may not solicit money, gifts, gratitude, or any other personal benefits or favors of any kind from providers, contractors, producers, accounts, or people that are served and their families.
- Staff and affiliates 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. Any entertainment issue should be discussed with executive staff including the Compliance Officer.
- Staff and affiliates may not accept gifts, gratuities or other items of value from service recipients, their family, vendors, contractors, referral sources, etc., affiliated with the agency that are not a reasonable addition to a business relationship but is primarily intended to gain favor or to influence a business decision. This includes but is not limited to cash, check, and gift cards. These gifts and/or gratuities may be interpreted as an inducement for services and might influence, or appear to influence, another person's judgment in the performance of his or her job duties. Improper gifts should be returned to the donor with an appropriate explanation. It is the responsibility of the employee and affiliate to remind the giver of this policy should it occur. Exceptions can be made to this policy with approval from a supervisor and Executive staff.
- Staff and affiliates may not give gifts, gratuities or other items of value to the parties mentioned above except as permitted by Standards of Conduct policy and Executive staff.
- A small non-monetary gift such as candy or cookies at holiday times from a service recipient may be appropriate and is not considered gratuity or a formal gift. Also, an item made by a service recipient may be accepted by staff so long as acceptance of the gift is determined to be in the best interest of the consumer. Such determination is made by staff in consultation with his/her supervisor and the Compliance Officer.



- All gifts, gratuities or other items of value presented to staff must be reported to the employee or affiliate's supervisor and to the Compliance Officer. Executive staff retain the right to determine the appropriateness of a staff member accepting any type of gift, gratuity or other item of value. Generally speaking, gifts with a value of no more than \$25.00 can be considered.
- Anonymous gifts and/or donations from family members or other individuals to service recipients in a specific program are acceptable as approved by Executive staff. If family members or other individuals wish to express gratitude to the staff, they can make a donation to the program or a contribution to the agency.
- Any Affected Individual who does not follow agency policy may be subject to disciplinary action, including termination of contract, assignment or engagement with **Concern Housing**.

#### Agreements with Contractors and Vendors

The Organization 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 Organization'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 Organization 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 Organization's books, are strictly prohibited.



## Federal and State Programs

**Concern Housing** 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 Organization. You must abide by the policies and procedures and the Standards set by the Organization.

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

**Concern Housing** 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 Organization'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; and
- Billing errors are promptly identified and any payments received in error are promptly returned to the payer.

Employees, interns, volunteers and contractors responsible for the documentation, charging, coding, billing, and accounting of services must comply with all applicable State and Federal regulations and **Concern Housing** policies and procedures.

It is against the law and **Concern Housing'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 Organization 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 Organization or to an individual employed by or associated with the Organization. All Affected Individuals must report any requests for information or cooperation with an investigation to Executive staff including the Compliance Officer immediately.

## Employment Environment

**Concern Housing** is committed to creating a safe and professional workplace where all 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 the Organization'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 Organization's policies prohibiting discrimination and harassment in all facets of the Organization's work.

All Affected Individuals are required to support the Organization'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 Affected Individuals 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 Organization'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.

## Professional Boundaries

Concern expects all employees and affiliates to maintain a professional relationship with all service recipients, current as well as former, at all times. Every employee and affected individual is responsible for upholding this professional approach with all service recipients in order to be effective in their respective roles and thereby advance the overall well-being and rehabilitative progress of individual. Violations of this policy are taken very seriously and any evidence of nonprofessional interaction will place the employee or the affiliate's continued affiliation with Concern in jeopardy. All concerns related to the employment environment should be addressed with a supervisor, senior management, Human Resources, the Senior Associate Executive



Director, or any executive staff. The following are examples, although not all-inclusive, of nonprofessional interaction which would violate agency policy:

- Engaging in unauthorized personal relationships with service recipients including, but not limited to, dating them, exchanging gifts, sharing personal intimacies with service recipients, and socializing with the service recipients outside of approved agency functions.
- Encouraging or permitting the development of sexual, personal or unapproved social contact between staff members and service recipients. Engaging in sexual relations with service recipients is reportable to the Justice Center and to the Office of Mental Health as consumer abuse and may be reported to the police as a potential crime.
- Unauthorized visits to residences of current and/or former service recipients, with or without permission of the service recipient and supervisory staff.
- Unauthorized telephone contact with current and/or former service recipient, with or without permission of the service recipient.
- Engaging in, or permitting, unwarranted/excessive/or other inappropriate physical contact with service recipients.

Regarding peer employee boundaries: Concern makes every attempt to hire peers for positions in locations where they do not live to avoid a potential conflict of interest. During agency orientation, all employees including staff who hold peer positions receive training on professional boundaries.

### **Work Safety**

Safety policies have been developed to protect staff and affiliates from work place hazards. All employees and affiliates must familiarize themselves with these policies and how they apply to their jobs. Each employee and affiliate are responsible for observing universal precautions when applicable and for assisting others to do so.

### **Drug and Alcohol-Free Workplace**

Concern is committed to providing a drug and alcohol-free workplace. All employees and affiliates are prohibited from unlawfully manufacturing, distributing, dispensing, possessing, or using illegal substances and distributing, dispensing, possessing or using alcohol at the workplace. Any employee or affiliate violating this policy is subject to disciplinary action up to and including termination for a first offense.



## Seeking Guidance and Reporting Violations

Concern recognizes that open communication is the key to consistent compliance. As such, Concern will keep all reports of violations confidential to the extent permitted by law, unless doing so prevents Concern from fully and effectively investigating the violation which is reported. No employee or affiliate will be punished or retaliated against for good faith reporting of possible noncompliant behavior or activity. In the event an individual believes that he/she has been subject to punishment or reprisal for good faith reporting, he/she should immediately report any such actions to a supervisor or executive staff, and the Senior Associate Executive Director.

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 **Concern Housing'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. When any person knows or reasonably suspects that the expectations in the Standards of Conduct and the Compliance Program have not been met, this must be reported to the immediate supervisor.

If he/she is not comfortable with this option, he/she may report the concern to senior management, Senior Associate Executive Director, or Executive Director. The Compliance Officer may be reached at 631-750-2221. The Executive Director can be reached at 631-758-0474. Reports may be made in person; by phone, fax, mail, or email; or anonymously via the Compliance Reporting tab on Concern's Intranet or in one of the following ways:

- Website: [www.lighthouse-services.com/concernhousing](http://www.lighthouse-services.com/concernhousing)
- Toll-Free Telephone:
  - English speaking USA and Canada: 833-750-0001
  - Spanish speaking USA and Canada: 800-216-1288
- E-mail: [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) (must include Concern for Independent Living as company name in report)
- Fax: (215) 689-3885 (must include Concern for Independent Living as company name in report)
- Mail: Concern Housing, 312 Expressway Dr. S., Medford, NY 11763, Attn: QI/Compliance Department. Concern's Main Office Telephone #: 631-758-0474.

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. The Organization 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.

## 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 **Concern Housing**.

Affected Individuals who knowingly fail to report illegal, unethical, or noncompliant activities or any other type of compliance concern are subject to appropriate disciplinary action, up to and including termination of employment, contract, assignment, or association with the Organization.



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 **Concern Housing's** Compliance Plan, Compliance Program Policies and Procedures, and Standards of Conduct.
- ✓ Follow **Concern Housing'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 **Concern Housing'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.