

Dear ARISE Employee/Volunteer:

Enclosed is the ARISE Corporate Compliance Code of Conduct. It is a requirement that we provide you with this annually, and that we obtain your acknowledgment of receipt.

Please accept my thanks for the great work that you do advocating with and providing services on behalf of the many individuals and families with whom we are in contact at ARISE and ARISE at the Farm.

Each one of us makes active choices every day to help promote the ARISE mission to work with people of all abilities to create a fair and just community in which everyone may fully participate.

We fully support an atmosphere of dignity, respect, and person-centered service delivery.

We have zero tolerance for behaviors that display disrespect toward individuals receiving services, coworkers, or our community partners.

We expect all of our employees to maintain professional conduct, including respectful interactions with individuals we serve and families, as well as respect for boundaries which includes detachment from personal involvements with individuals and / or their family members.

We also have zero tolerance for deceit or fraud of any kind, including fraudulent representations of work performed or services delivered.

We believe that compliance is EVERYONE'S responsibility. This means that we expect staff to complete required documentation as accurately as possible and follow the regulations and policies that apply to their jobs. Put simply, we expect all employees at ARISE to "do the right thing". ARISE leadership and the Quality Improvement Department routinely monitor the services that are delivered and the documentation you complete to ensure this practice is consistent throughout the agency. If you have any questions about your responsibilities, please speak to your supervisor. If you are aware of any possible fraud, we require that you report it to your supervisor or the Corporate Compliance Officer at (315) 671-2967. You can also use our anonymous reporting hotline at (315) 671-4645.



Tania Anderson, CEO

ARISE

Code of Conduct

Mission

ARISE's mission is to work with people of all abilities to create a fair and just community in which everyone may fully participate.

Core Values

We believe that:

- Services are best provided in a personalized manner designed around the individual's needs and goals.
- Working together, in partnership with the community at large, creates the best opportunities for people with disabilities.
- Our success is dependent upon having a qualified, caring, and trained staff.
- All individuals should be treated with dignity and respect.
- We are committed to practices which demonstrate excellence and continuous quality improvement.
- We must be flexible and seek out opportunities for advancement and growth.
- Sound, ethical business practices ensure financial stability and future organizational success.
- We strive to be diverse and culturally sensitive.

Commitment to Stakeholders

To the individuals we serve: We are committed to providing the highest quality of care, in a respectful and compassionate manner and conscious of unique individual needs.

To the families and communities we serve: We are committed to understanding the unique needs of the individuals we serve and to providing our services with cost-effective, quality considerations.

To our employees: We are committed to providing safe work environments; we strive to treat all employees with fairness, dignity and respect; we provide opportunities for development and professional growth, and work in a team environment where all ideas are considered.

To our third party payors: We are committed to working with our payors in ways that demonstrate our commitment to our contractual obligations and reflect our shared concerns for quality services in an efficient and effective manner. We encourage our payors to adopt their own set of ethical principles that recognize their obligations to the individuals we serve, as well as the need for fairness between providers and payors.

To our regulators: We are committed to creating an environment in which compliance with applicable rules, laws and regulations is part of standard processes at ARISE. We accept responsibility to self-govern and monitor adherence to requirements of law and our Code of Conduct.

To our suppliers: We are committed to fair competition among existing and prospective suppliers. We encourage our suppliers to adopt their own set of standards and ethical practices.

Rules of Conduct

We believe that certain rules of conduct must be observed to promote a positive and ethical work environment and pledge to abide by all applicable laws and regulations, as well as ARISE policies and procedures, including, but not limited to, those which make up our Corporate Compliance Plan.

We also understand that, as individuals working for and on behalf of ARISE, we have the added responsibility of following specific rules of conduct, as described below:

- To work cooperatively and respectfully with all employees, Board members and agents to provide the highest quality of services;
- To place the interests of the people we serve and their family members first and foremost in all aspects of what we do;
- To represent ARISE positively in the community at large;
- To conduct all activities in a fiscally responsible manner;
- To work in accordance with applicable laws, regulations and agency policies, and conduct business with the highest degree of integrity;
- To seek training and assistance in areas that would strengthen our ability to fulfill responsibilities to individuals receiving services at ARISE;
- To avoid conflicts of interest, including the acceptance and giving of gifts;
- To conserve resources of the agency and not engage in wasteful behavior;
- To treat confidentially information related to the agency and the individuals it serves and to respect the privacy of such individuals and fellow employees;
- To complete tasks in a timely manner and meet expectations for the quality of work that ARISE strives to achieve;
- To bill accurately and comply with the False Claims Act;
- To report to a supervisor, Director, the Compliance Officer or to the ARISE Compliance Hotline any potential violation of applicable laws, regulations and policies, including the Corporate Compliance Plan;
- To fully cooperate in investigations conducted by either ARISE or federal or state agencies regarding activities under the auspices of ARISE;
- To respect the role of the Board and management and to fully implement their decisions;
- To consult ARISE leadership when questions arise as to the conduct permitted under applicable laws, regulations and policies, including the Corporate Compliance Code of Conduct; and
- To report and record all information honestly and accurately.

Expectations and Ethical Standards of Conduct

We ensure that all aspects of care for individuals served and business conduct are performed in compliance with our mission statement, policies and procedures, professional standards and applicable governmental laws, rules and regulations, and other payer standards. ARISE expects every ARISE agent to adhere to the highest ethical standards and to promote ethical behavior. Any ARISE agent whose behavior is found to violate ethical standards will be disciplined appropriately (up to and including termination).

Fulfilling Your Obligations

The Corporate Compliance policies and Compliance Plan, as well as the Corporate Compliance Committee, exist to help all agents of ARISE in ensuring that all conduct is appropriate, legal, and ethical. In any situation where you cannot be assured of appropriate conduct, you are required to promptly inform your supervisor or the Corporate Compliance Officer (CCO). All agents of ARISE must be committed to ensuring full compliance with all existing laws, rules, regulations, protocols, and policies.

All ARISE agents that have knowledge of, or a concern about, potentially illegal or fraudulent activity must immediately contact a supervisor or the CCO. You are required to ensure that all concerns are brought to the attention of the CCO. Conversely, you must exercise sound judgment to avoid baseless allegations. Reports may be made in person, in writing, or over the telephone. Any written communication needs to be marked as "CONFIDENTIAL." Although reports may be made anonymously, in order for the CCO to obtain more information from, or respond to, the reporting individual, he or she is encouraged to provide his or her name and work location when the report is made. All reports made to the CCO will be confidential and privileged to the extent permitted by law. Refer to policy #13.5.107 for information regarding the investigation process.

Elements of the Corporate Compliance Code of Conduct

1. Billing and False Claims

Services provided are paid for by Medicaid, Medicare, private insurance, grants, and/or personal funds. All agents of ARISE must familiarize themselves with the billing process, and be vigilant in avoiding false claims.

The False Claims Act (FCA) states that it is a violation to knowingly present, or cause to be presented, a false or fraudulent claim for payment to the federal government, including the Medicaid or Medicare program. "Knowingly" includes actual knowledge, "deliberate ignorance" or "reckless disregard" of the facts. All agents of ARISE are prohibited from submitting false claims to obtain payment for services we provide. False claims include claims for payment which the provider knows are not properly authorized or delivered, claims the provider

submits with deliberate disregard for accuracy, or deliberate ignorance of guidelines.

2. Client Rights

It is an expectation that all ARISE agents will partner with service recipients in the development of their service plans and deliver all of the prescribed services based on their assessed needs. We treat all service recipients and families with courtesy, compassion, and dignity. We recognize and honor the service recipient's and family's right to privacy and confidentiality. If you become aware of any situation in which a service recipient or family member's rights are being violated, contact your supervisor or the CCO.

3. Confidentiality and Privacy (HIPAA)

ARISE recognizes the importance of confidentiality in the provision of services. ARISE has policies and procedures to ensure that all information and records pertaining to service recipient information are kept confidential in accordance with applicable law. All ARISE agents with access to confidential information and records must strictly adhere to the privacy and confidentiality policies. Documents containing sensitive data, including information concerning service recipients and/or employees, must not be left in public view or in an unsecured location. Given the prevalence of computer use, the potential for a breach of security exists, and must be monitored at all times. If you become aware of unauthorized or inappropriate disclosure of confidential information or documents by an agent of ARISE, contact your supervisor or the CCO.

4. Conflicts of Interest

A Conflict of Interest is defined as any situation in which financial or other personal considerations may compromise or appear to compromise:

- a. An employee's business judgment
- b. Delivery of services
- c. Ability for an employee to do his or her job.

An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in personal gain for that employee or for a relative as a result of business dealings. For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.

Business dealing with outside entities should not result in unusual gain for those entities, ARISE, or an employee. Unusual gain refers to bribes, product bonuses, special fringe benefits, unusual price breaks, and other windfalls designed to ultimately benefit the employer, employee, or both.

Materials, products, designs, plans, ideas, and data are property of ARISE and should never be given to an outside firm or individual except through normal channels with appropriate peer authorization. Any improper transfer of material or disclosure of information, even if it is not apparent that an employee has personally gained by such action, is prohibited.

Report suspected violations immediately to a supervisor or the CCO.

5. Professional Licensure, Certification, and Credentialing

All service professionals that provide services must be fully capable of fulfilling their clinical responsibilities. No agent of ARISE will be permitted to provide a service to a service recipient unless it has been demonstrated that he or she possesses the required education, licensing, or certification and experience necessary to perform his or her responsibilities, and maintains ongoing requirements for their licensure, certification, or credentials. ARISE maintains an employee file for all service providers, which contains documentation of all credentials. If you become aware of any information or documentation indicating that any agent of ARISE has not adhered to the requirement for credentialing, licensure, or certification, report it to your supervisor or the CCO

6. Fraud and Abuse

Fraud is the intentional deception or misrepresentation of something a person knows to be false or does not believe to be true. It may include:

- a. Making false entries in ARISE records, including service delivery documentation
- b. Altering any permanent entries in ARISE records
- c. Approving payments or receipts on behalf of ARISE that are not described in documents supporting the transaction
- d. Creating or participating in the creation of any records that are intended to mislead or conceal anything that is improper.

Abuse generally encompasses incidents or practices that are inconsistent with sound fiscal, business, or medical practices that may result directly or indirectly

in unnecessary program costs, improper payment, or payment for services that fail to meet professional standards of care or that are medically unnecessary.

Examples of Fraud and Abuse

- a. Inappropriate use of flex funds
- b. Delivering services when it is known that all appropriate documentation has not been obtained and/or properly authorized
- c. Billing for services that were not provided
- d. Billing for unnecessary services
- e. Misdating a document or signing someone else's name
- f. Working in ARISE systems under someone else's log-in credentials
- g. Failure to document and bill for services delivered

Immediately bring any concerns regarding Fraud and Abuse to the attention of your supervisor or the CCO.

7. Gifts, Gratuities, and Entertainment

We specifically prohibit ARISE agents from accepting gifts, excessive entertainment, or other favors from any outside concern that does, or is seeking to do, business with, or is a competitor of, ARISE under circumstances tending to support an inference that such action was intended to influence or possibly would influence the individual in the performance of his or her duties.

In health care in particular, business courtesies pose a risk for conflict of interest, fraud and/or abuse related to anti-kickback regulations. The Anti-Kickback Law prohibits the offer of payment, solicitation, or receipt of any form of remuneration for the referral of Medicaid or Medicare recipients.

ARISE prohibits any ARISE agent from offering to a potential referral source, or receiving from a potential referral source, any business courtesies unless ALL the following criteria are met:

- The business courtesy is not based, directly or indirectly, on the volume or value of the referrals or other business generated by the potential source.
- The business courtesy does not consist of cash or the equivalent of cash.
- The business courtesy is not solicited by the potential referral source or the referral source's practice or ARISE agents.
- The business courtesy must not exceed \$338 (or any updated amount in law or regulation) in value or cause the total value of business courtesies

- extended to the potential referral source or immediate family to exceed \$338 (or any updated amount in law or regulation) for the calendar year.
- The business courtesy does not violate the federal Anti-Kickback statute or any state or federal law governing claims submission.
 - The business courtesy is not extended to a physician group.

All ARISE agents must receive prior approval from the Chief Executive Officer (CEO), Chief Financial Officer (CFO), Director of Advancement, or the Corporate Compliance Officer (CCO) before extending business courtesies to potential referral sources and/or their immediate family members. The CCO will record any business courtesy extended to a potential referral source or his or her immediate family members on the 'Gifts and Entertainment Log'.

8. Intellectual Property and Internal Systems

All ARISE agents are responsible for maintaining and protecting the information used in connection with their role. You must not record inaccurate information, make inappropriate or unauthorized changes to information, or destroy or disclose information, except as authorized. Current and former agents of ARISE may not, without prior written consent of ARISE, use for their own benefit or disclose to others any confidential or proprietary information obtained during their employment or term of engagement. Examples include (but are not limited to) any ARISE training materials, policies, and forms. Any concerns regarding confidential or proprietary information must be brought to the attention of your supervisor or the CCO.

9. Record Retention, Completion, and Maintenance

Multiple laws and regulations require ARISE to retain records and documents for specified periods of time. Failure to retain records as required can result in substantial monetary penalties and prevent ARISE from having the documentation to legally defend actions regarding employees, clients, and/or fiscal matters. You are expected to follow all ARISE policies and procedures regarding the maintenance, retention, and destruction of records.

Records provide the basis of care and future decisions, and represent the legal account of actions taken by ARISE personnel, which is critical to respond to claims made against ARISE. Records must be completed accurately and in a timely fashion. ARISE has specific protocols for the completion, maintenance, and modification of records, and you are expected to comply fully with those protocols. Failure to do so can result in internal and external sanctions, fines and

penalties, as well as professional licensure actions. If you suspect any violation of record policies or protocols, contact a supervisor or the CCO.

10. Reporting Requirements

All agents of ARISE must report any actual or suspected violation of this Code of Conduct, any laws and regulations, and any ARISE policies. Reports can be made to a supervisor, the CCO, or anonymously through the ARISE Compliance Hotline. Failure to follow this Code of Conduct, and/or failure to follow ARISE policies, can result in corrective action up to and including termination. No matter the method of reporting, steps will be taken to protect your confidentiality and anonymity when appropriate.

All employees and agents of ARISE must cooperate fully and honestly in any investigation into an alleged violation of this Corporate Compliance Code of Conduct, laws and regulations, and ARISE policies and procedures.

11. Reviews and Inspections

ARISE is reviewed and inspected by government agencies. You are required to become familiar with the requirements of these agencies, as they impact your department and role, and to ensure compliance with them. Failure to comply with government oversight agencies can lead to sanctions, required plans of corrective action, and in extreme circumstances, to the restriction of further service provision. There may be times when ARISE is asked to cooperate with an inspection by a federal or state government agency, or to respond to a request for information. All agents of ARISE must report any request for information or inspection to a supervisor or the CCO immediately.