

Putnam County Comprehensive Services, Inc.

Corporate Compliance Plan

I. Organization Overview

Putnam County Comprehensive Services, Inc. has many years of experience assisting individuals with disabilities living in Indiana. Our agency is committed to providing services that help individuals reach their highest level of independent living possible. Our comprehensive programs fall under five main categories of service:

- Community Living Services
- Residential Services
- Habilitation Services
- Service Coordination
- Employment Services

II. Mission Statement

The mission of PUTNAM COUNTY COMPREHENSIVE SERVICES, INC. is to provide services to individuals with disabilities and similar characteristics in order to reach their potential in attitudes, habits and skills through training and integration, making them contributing members of their community; and to promote community awareness and acceptance of people with differing abilities.

III. Vision Statement

PUTNAM COUNTY COMPREHENSIVE SERVICES, INC. is committed to becoming one of the most valued agencies in our field. We will accomplish this through a professional approach by saying what we mean, doing what we say, and making a positive difference in the lives of the people we serve.

IV. Corporate Compliance Overview

Putnam County Comprehensive Services, Inc. has established a Corporate Compliance Plan tailored to the agency's principles lines of business. We are dedicated to managing and operating its programs in keeping with the highest of business, ethical and moral principles. Each agency employee, member of the Board of Directors, consultant and volunteer contributes to achieving these principles by conducting business activities for the agency with integrity and high ethical standards. Supervisors and managers also contribute to achieving these principles

by exercising good leadership and being a good example in creating and promoting a workplace environment in which compliance and ethical business conduct are expected.

Putnam County Comprehensive Services, Inc. has adopted the following definition of Corporate Compliance.

“A Corporate Compliance Plan is a system which is designed to detect and prevent violations of law, as well as the likelihood of unethical activity by agency employees, volunteers, contractors, officers and directors.”

Putnam County Comprehensive Services, Inc. will transact its business in compliance with the laws of the jurisdiction in which it does business, including local, state and federal jurisdictions. As a not-for-profit agency, Putnam County Comprehensive Services, Inc. will conduct business in compliance with all IRS regulations governing tax-exempt organizations and refrain from any private **inurement** and benefit issues. Instances where questions arise concerning interpretation or applications of laws and regulations should be referred to the Executive Director or Corporate Compliance Officer. Applicable laws include, but are not limited to, anti-kickback statutes, labor laws, tax code and regulations, antitrust laws, copyright laws, false claims statutes, rights of individuals receiving services and environmental laws.

As used in this Corporate Compliance Plan, the following definitions apply;

1. Putnam County Comprehensive Services, Inc. representatives: employees, agents, board members, committee members, volunteers, contractors, and others working for or on behalf of Putnam County Comprehensive Services, Inc.
2. Agency: Putnam County Comprehensive Services, Inc.

V. Code of Business Conduct & Ethics

A. Overview

The Code of Business Conduct & Ethics provides Putnam County Comprehensive Services, Inc. employees, agents, members of the Board of Directors, consultants and volunteers with information necessary to adhere to the high ethical principles the agency lives by. PUTNAM COUNTY COMPREHENSIVE SERVICES, INC. is accountable for compliance not only with the Code of Business Conduct & Ethics, but also with all laws and regulations applicable to our activities, and other policies and procedures prepared by our agency and oversight bodies.

B. Honesty and Integrity

Honesty and Integrity are what this Code of Business Conduct & Ethics is all about; they define our relationships with people receiving services, outside agencies, business partners and each other. By maintaining the highest level of corporate integrity through open, honest and fair dealings, we earn trust for our services and ourselves from everyone with whom we come in contact.

C. Standards of Conduct

PUTNAM COUNTY COMPREHENSIVE SERVICES, INC. representatives are expected to comply with the following standards:

1. Business Principles

a) Maintain the Confidentiality of Agency Records

The agency is responsible and accountable for the integrity and protection of its business information. All agency records and documents (in any form or media) are the sole property of the agency and thereby considered confidential by its nature, except as provided by law or regulation. All agency information (i.e. policies, procedures, strategic or business plans, administrative memos, financial document, etc.), whether in electronic or written format, is confidential and may not be released or shared with others outside the agency without proper prior authorization.

No PUTNAM COUNTY COMPREHENSIVE SERVICES, INC. representatives shall disclose to others any confidential information obtained during the course of employment work (paid or unpaid) or receipt of reports, which have not been published or disclosed, to the public. Documents and electronic media containing sensitive information on people receiving services, staff, consultants, volunteers, board members and other representatives of the agency must be carefully handled and properly secured. Once an agency representative terminates their relationship with the agency, they have no right to access or use agency information.

If any PUTNAM COUNTY COMPREHENSIVE SERVICES, INC. representative observes or becomes aware of a breach of this policy including misuse of confidential information, or an unauthorized or unrecognized individual using a computer in an area familiar to you, immediately contact a supervisor.

b) Protect Agency Assets

It is the obligation of all agency representatives to protect the assets of the agency. Agency property, such as office supplies, office equipment,

vehicles, and property may not be used for personal reasons without approval from a department head.

Any misuse or misappropriations of agency funds, information, equipment, facilities or other assets may be considered criminal behavior and can bring severe employment and legal consequences. Agency funds include, but are not limited to bank accounts, credit and debit cards, and business accounts.

c) Maintain the Corporate Image

The agency's reputation and identity are among its most valuable assets. All agency representatives are expected to conduct themselves in a manner that reflects positively on the agency's image and identity, both internal and external. No one should act in a way that adversely affects the reputation or image of the agency with employees, volunteers, people receiving services or with the community at large.

Each agency representative should endeavor to deal fairly with the people receiving services, consultants, suppliers, competitors and other employees. No one should take advantage of anyone else through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or other unfair-dealing practice.

While the agency cannot control what its representatives do during non-working hours, it is important to understand that information posted online is public and comments made about the agency or agency representatives that are defamatory or violate agency policy (i.e. confidentially, conflict of interest, harassment) can result in disciplinary action, no matter whether the employee wrote it from work or outside of work.

d) Have Job Accountability

Each agency representative is responsible for knowing and executing the responsibilities of his or her job. This means the individual is held accountable for the quality of the work he or she produces. In addition, management is responsible for ensuring that they have provided their employees with the necessary information to do their jobs.

e) Avoid Conflicts of Interests

Each agency representative has a primary business responsibility to the agency and is expected to avoid any activity that may interfere or have the appearance of interfering with their performance. A conflict of interest exists if an agency representative's outside business or other interests may affect adversely, or have the potential to affect adversely,

his or her motivation, objectivity, loyalty or performance. In addition, a potential conflict of interest occurs when an individual's personal or private interests might lead an independent observer to reasonably question whether the individual's professional actions or decisions are influenced by significant personal interest, financial or otherwise.

Agency Representatives shall not participate in the selection, award or administration of a contract supported by Federal, State or other government funds if a real or apparent conflict of interest would be involved. Such a conflict would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or when the agency employs or is about to employ any of the parties indicated herein, has a financial or other interest in the firm selected for an award.

Some additional situations in which agency representatives might encounter that would be considered a conflict of interests are:

- Having a relationship with a person receiving services outside of the workplace and/or employment by a person receiving services and/or the family member of a person receiving services;
- Directly supervising services a family member as a contractor, supplier or employee of the agency;
- Romantic relationships between a supervisor and a subordinate. Supervisor is defined as "a person who has authority, direct or indirect, over another by virtue of their job classification. Subordinate is defined as "a person who is answerable to another person based on their job classification." While the supervisor is ultimately held responsible for ensuring that this type of relationship does not occur, it does not absolve the subordinate of any wrong doing.
- Using agency assets, including agency time, name, information equipment or facilities, for personal use; without prior approval
- Misuse of information obtained by an agency representative during the course of his or her employment;
- Soliciting person cash or non-cash gifts of any amount or value from any person or business that has a relationship with the Agency;
- Accepting personal cash gifts of any amount from any person or business that has a relationship with the Agency;
- Financial transactions between people receiving services and/or their family members/responsibility parties;

- Outside employment that interferes with the employees job responsibilities and/or is in conflict with agency interests.
- Use of information created by or for the agency for personal gain or use by others outside the agency without prior permission.

Certain agency representatives, as identified in the agency “Conflict of Interest Policy & Procedures”, are required to complete the Agency “Conflict of Interest Disclosure/Confidentiality Agreement” form upon the beginning of the relationship with the agency and when there are changes with relationships that may begin later.

The above situations identified as “conflicts of interests” are not all inclusive. Agency representatives are expected to exercise good judgment and be mindful of how their personal relationships and outside activities may be affecting the workplace. Agency representatives may also find themselves in a situation where they do not feel like they can be objective in their decision making due to their personal relationships or beliefs. Should an agency representative feel that they are not able to be objective in making a business related decision they should voluntarily abstain/refrain from participating in the decision making process. Furthermore, if any matter exists that might be a conflict of interest or creates the appearance of a conflict of interest, agency representatives are required to consult their supervisor, Compliance Officer or Staff Representative to assess whether a problem exists.

f) Display Caution when Offered Gratuities

In the course of performing their jobs, agency representatives may be offered gratuities which usually are intended as gestures of goodwill or appreciation. These include gifts, entertainment, gift cards, meals and beverages, tickets to sporting or cultural events, services or other similar favors. Agency representatives may not accept, individually or as part of a group, anything that could reasonably be thought to have more than a nominal intrinsic value (nominal intrinsic value: **e. g.** promotional or advertising pens, pencils, notepads, calendars, greeting cards, trinkets, baked good or other similar gifts of limited value).

Gifts, gratuities, or attendance **at events exceeding nominal intrinsic, typically greater than \$25.00,** should be refused or returned unless the Corporate Compliance Officer approves of acceptance as part of a business need or special occasion, i.e. holiday gift basket during holidays to be shared amongst representatives.

Even nominal gifts can be inappropriate if used in a way which creates the impression that a certain vendor or person is receiving or attempting to obtain preferential treatment, therefore the acceptance of any gift, regardless of its value, must be done so with caution and when in doubt needs be reported to a supervisor in order to determine whether the gift may or may not be accepted to avoid a conflict of interest.

Acceptance or participation in a business meal situation is appropriate when based on a business need and such dining occurs in conjunction with business discussions.

These guidelines cannot cover every situation that may arise; employees should discuss with their supervisor or Compliance Officer any situation involving gratuities they are uncertain about.

g) Adhere to the Agency Media Communication Policy

It is the agency's policy to provide open, accurate, and consistent communication with the public. To maintain the consistency and accuracy of the information, agency spokespersons are designated to respond to all inquiries. Only these designated spokespersons are authorized and responsible for releasing information at the appropriate time and for guarding against the inadvertent disclosure of confidential information. All inquiries regarding the Media Communication Policy should be directed to the **Executive Director, Assistant Director or Designee.**

Social network sites, such as Facebook and MySpace, also fall under the umbrella of "media." If you are not a designated spokesperson for the agency then any comments you make about the agency activities on these sites could, depending on the content, be a violation of the Agency Media and Confidentiality Policy. Representatives of the agency need to take responsibility for what they write, and exercise good judgment and common sense. It is also important that agency representatives who identify themselves on these sites as having an affiliation with Putnam County Comprehensive Services do not give readers the impression that their comments represent agency opinion.

2. Quality of Care

a) Adhere to Individual's Rights and Responsibilities

By regulations all individuals receiving services are entitled to certain Rights and Responsibilities. It is expected that all agency representatives adhere to the provisions set forth in these regulations.

In particular, agency representatives shall not engage in any activities that constitute abuse of persons receiving services as defined in the regulations of Division of Disability and Rehabilitation Services. Failure to exercise one's duty to intercede or to report any activity, which may be considered abuse, will constitute abuse.

b) Follow Individual's Service Plan

Agency employees are expected to comply with each person's service plan and communicate any changes in the plan to the necessary parties in accordance with regulatory requirements and program policies and procedures.

It is not acceptable for people receiving services to carry out the duties of employees unless such tasks are described in their plan of services by their program planning team and for the purpose of increasing their skills.

c) Maintain Appropriate Interactions with Individuals

Agency representatives must maintain professional relationships with people receiving services. There shall be no personal financial transactions between agency representatives and people receiving services or their family/responsible party. Financial transactions, which may be construed as exploitation or result in greater benefit to the agency representative than the person receiving services will be considered abuse.

The receipt of any personal gift by any agency representative from any person receiving services or their family member/responsible party is discouraged and needs to be avoided. Depending on the circumstances a gift of nominal value may be allowed. An example of such a gift might be baked goods or a dollar store trinket. Any gift must be disclosed to the supervisor to determine whether the gift may or may not be accepted to avoid a conflict of interest.

Agency representatives may not accept cash gifts from individuals receiving services under any circumstances. However, cash donations from a family member/responsible party to the agency may be accepted. Should a family member/responsible party be interested in donating to the agency they should contact the Executive Director.

All agency representatives are expected to maintain a professional demeanor with people receiving services. It is also accepted that agency representatives shall model appropriate and acceptable behavior while in the presence of people receiving services.

d) **Safeguard Individuals Privacy**

Agency representatives shall treat all clinical and program information as confidential and utilize such information in a professional manner at all times. Access to information on people receiving services must be limited to the extent permitted by the agency policies and procedures pursuant to state and federal law. In addition, release of information pertaining to HIV/AIDS is subject to additional regulatory requirements and should not be released without the proper authorization to do so. Any PUTNAM COUNTY COMPREHENSIVE SERVICES, INC. representative who engages in unauthorized disclosure, access to, or misuse of information in violation of the privacy rights of people receiving services, or others may be subject to disciplinary action in addition to civil or criminal sanctions. Any PUTNAM COUNTY COMPREHENSIVE SERVICES, INC. representative who becomes aware of such unauthorized disclosure should immediately report this to their supervisor or Corporate Compliance Officer.

3. **Medical Practices**

a) **Follow Regulations Regarding Control of Medications**

It is the agency policy that all Putnam County Comprehensive Services representatives shall be diligent in discharging their obligations regarding prescription drugs and controlled substances in accordance with applicable laws, regulations, and agency policy and procedures.

The agency is legally responsible for the proper distribution, handling of, and prevention of unauthorized access to pharmaceutical products. The diversion of any prescription drug or controlled substance, including a drug sample, in any amount for any reason to an unauthorized individual or entity is forbidden.

Putnam County Comprehensive Services representatives may not use drugs stored in agency programs intended for the use of people receiving services.

4. **Legal Obligations & Compliance**

a) **To Maintain a Safe and Healthful Workplace**

The agency has a commitment to maintain a safe and healthful workplace for agency representatives and people receiving services. As part of this commitment, the agency maintains reasonable safety rules, practices, and procedures for all agency representatives. At the same

time, the agency expects agency representatives to be efficient and productive in performing their job assignments.

The agency provides a safe and healthy work environment by adhering to the laws, regulations, and commonly accepted safe practices in accordance with federal and state laws regarding occupational and environmental safety.

Laws and policies regarding hazardous materials, pollutants, and medical waste must be strictly followed by all Putnam County Comprehensive Services, Inc. representatives.

b] Refrain from Misrepresentation

Honesty based on clear communication is the cornerstone of ethical disclosure of information. Putnam County Comprehensive Services, Inc. representatives shall be honest and make no representation or dishonest statements in conducting agency business affairs. Putnam County Comprehensive Services representatives must report and record all information accurately and honestly including all marketing materials, service records, requests for payment, timesheets, financial reports, and other similar documents, which relate to business activities. Marketing materials will accurately reflect certification, licensure, and services available.

In addition, Putnam County Comprehensive Services representative must not make false statements with respect to the conditions or operations of any program nor make false statements with respect to information regarding ownership and control of a facility or program.

c] Refrain Engaging in Unfair Trade Practices

All agency representatives are expected to comply with all laws pertaining to the restraint of trade and fair competition. Such laws generally forbid any kind of understanding or agreement (written or verbal) between competitors to fix and control fees or payments for services or products, or to engage in any other conduct that results in restraints of competition.

Unfair methods of competition and deceptive acts or practices are also prohibited. Examples of these include false or deceptive statements or comparisons about the agencies services or falsely disparaging competitor's services without data to substantiate it.

d] Adhere to Tax-Exempt Requirements

The agency is a tax-exempt entity under the rules and laws of Indiana State and the Federal Internal Revenue Service. In order to comply with applicable law, the agency must operate for the benefit of the community and avoid “private inurement’ or “private benefit” as defined by these laws. Criminal penalties may be exercised if a violation of these tax laws is found and substantiated. In this regard, Putnam County Comprehensive Services representatives shall be familiar with these restrictions:

- The agency sales tax exemption is used only for legitimate agency business and service transactions.
- Personal items cannot be purchased through the agency even if reimbursement is offered.
- All appropriate withholding taxes must be applied to staff wages.

e] Comply with Fundraising Standards

The agency adheres to acceptable fundraising standards. Only fundraising activities that benefit the agency and the programs or services are allowed and must be specifically authorized by the Executive Director. Fundraising events must be consistent with the mission, vision, goals, mandates and values of the agency.

Any Putnam County Comprehensive Services representative that obtains funds as a result of fundraising activities on behalf of the agency must promptly deposit the funds with the bookkeeper for appropriate record keeping and cash controls. A receipt for funds deposited must be obtained from the bookkeeper.

Fundraising reports are issued regularly and comply with applicable laws and regulations associated with the agency licenses and not-for-profit law.

f] Submit Accurate Billings and Financial Reports

Billing activities are to be performed in a manner consistent with Medicaid and other payers’ regulations and requirements. The agency will comply with all pertinent regulations in billing practices, including but not limited to, specific program requirements, need for service, procedure codes, bad debt reporting, credit balances, and duplicate billing.

All billing and claims generated must accurately reflect that services rendered are supported by relevant documentation and are submitted in compliance with applicable laws, rules, regulations, and program requirements. Agency representatives should never knowingly make or present improper, false, fictitious, or fraudulent claims to any government or private health care program, employee, department, or agency. Improper activity can include, but is not limited to:

- Misrepresentation of Services
- Duplicate Billing
- Multiple Coverage and Secondary-Payroll Fraud
- False Claims Statements
- Falsifying Dates on a Claim

Those responsible for completing and submitting financial reports will do so in accordance with acceptable accounting practices and legal obligations. Improper accounting practices include, but are not limited to:

- Supplying false or misleading information in the agency's financials or other public documents, including its annual information return; or
- Providing false information to, or withholding material information from, the agency's auditors.

It is a crime to submit a "false claim". A false claim occurs when a person or organization submits a record or claim for payment of services, property or other items to the government, knowing that the information is not true. "Knowing" means that the person or organization:

- Knows the record or claim is false, or
- Is asking for payment and is deliberately ignoring whether or not the record or claim is false, or
- Is asking for payment and does not care if the record or claim is false.

The Federal Government enacted the False Claims Act law that allows a person who knows that an organization has filed a False Claim for payment to file a lawsuit in Federal Court on behalf of the government, and in some cases, the person can receive a portion of the damages awarded. There are additional civil, administrative, and criminal laws that apply to the submission of a false claim. Additional information on

these laws is available in the Employee Personnel Policy and Procedure Manual, by contacting the Corporate Compliance Office.

g] Refrain from Accepting Kickbacks

The term “kickback” is defined as the giving of remuneration of any kind, which is interpreted under the law as “anything of value”. In the United States it is illegal to provide, offer, or accept a kickback or bribe, A kickback or bribe may be defined as any money, fee, commission, credit, gift, gratuity, anything of value or compensation of any kind that is provided directly or indirectly, and that has as one of its purposes, the improper obtaining or rewarding or favorable treatment in a business transaction.

No agency representative or other agency representative shall solicit, receive, offer to pay, or pay remuneration of any kind in return for referring an individual for items or services, or purchasing, leasing, ordering, or arranging for goods, facilities, services, or items for which payment may be made under federal, state, or local health care programs.

All Putnam County Comprehensive Services, Inc. representatives should avoid the offering or receipt of a gift in circumstances where it could appear that the purpose of the gift is to influence the agency’s relationship with a vendor, regulator, or other person or entity. The receipt of any gift by any agency representative from a vendor, contractor, etc.... must be disclosed to the supervisor to determine whether the gift may or may not be accepted to avoid a conflict of interest.

h] Follow Research Grant Standards

Research grant proposals involving people that the agency serves are subject to the provisions or applicable state and federal laws and regulations. Researchers must be vigilant in considering whether grants involve improper inducements for referrals. Research, which encourages or results in improper referral practices, could constitute “kickback” in violation of federal and state law.

i] Be Familiar with Regulations Governing Areas of Responsibility

It is expected that all agency representatives adhere to the rules and regulations set forth by the State of Indiana and the Federal Government and comply with any contractual obligations the agency may have. In addition Putnam County Comprehensive Services representatives shall:

- Be familiar with program regulations governing areas of responsibility, receive and understand new regulations and/or expectations and to inform the supervisor or appropriate agency administrator of any possible issues of noncompliance.
- Insure that a Request for Service Application, or similar documentation, is properly submitted to the respective licensing organization, as required, to establish and/or change service provisions.
- Insure that questions of training and compliance with the submission of a Request for Service or the application of regulations should be referred to the respective supervisor and/or administrator.

5. **Human Resources Principles & Community Involvement**

a] **Comply with Labor & Employment Laws**

The agency fully complies with all applicable labor laws and statues regarding employee-employee relationships and workplace environment.

The agency employs only persons who are legally authorized to work in the United States consistent with federal laws. Individuals who are perspective candidates and who are United States citizens or who possess a “green card” or work visa are entitled to be hired. The appropriate documentation of citizenship status must be presented to the Human Resources Department at the time of hire.

b] **Comply with Payroll Deductions**

The agency fully complies with the salary basis requirements of the Fair Labor Standards Act (FLSA). Therefore, the agency prohibits all company management staff as well as the payroll office from making improper deductions from the salaries of employees.

If an employee believes that an improper deduction has been made to their salary, that employee should immediately report this information to their direct supervisor, or to the Human Resource Manager.

Reports of improper deductions will be promptly investigated. If it is determined that an improper deduction has occurred, the employee will be promptly reimbursed for any improper deductions.

c] **Embrace Diversity**

The agency respects and welcomes diversity in its employees, people receiving services, contractors, and other representatives.

There shall be no discrimination activity against any person for any reason, including race, religion, national origin, creed, age, gender, ethnic background, sexual orientation or disability except where a bona fide occupation qualification is involved.

The agency is committed to equal employment opportunity.

d] **Display Ethical Personal Conduct**

Ethical personal conduct on the job means treating oneself and others with respect and fairness. Workplace harassment includes both sexual harassment and harassment in a more general nature. Sexual harassment includes both quid pro quo and hostile work environment scenarios. Other forms of harassment include unwelcome or unwanted attention or discrimination conduct based on an individual's race, color, creed, religion, national origin, gender, sexual preference, marital status, age, and/or disability. Examples of harassment include, but are not limited to inappropriate jokes, offensive body language such as finger pointing, or offensive materials such as sexually explicit pictures. It can include verbal, nonverbal or physical abuse. Something considered harmless by one individual may be perceived as harassment by another. The agency expects all agency representatives to conduct themselves in a manner appropriate to the workplace and to keep all work environments free of harassment.

e] **To Maintain Agency Representative Privacy**

Every agency representative has the right to confidentiality of certain employment records as well as the privacy of personal activities outside of business hours. In turn, the agency has rights of access to all agency property and communication, records and information created in the business setting. By using agency property and/or creating such records and information, the agency representative consents to such access.

The agency will not release information regarding our current agency representatives without written consent unless it is required by a program survey, subpoena, or public record. An internal investigation may at times require the review and/or release of certain personnel information to agency personnel, law enforcement, and/or oversight bodies.

The agency emphasizes the need for balance between work, personal and family life, and encourages agency representatives to pursue interests and activities outside the workplace. Personal interests and beliefs, however, must not be imposed on other agency representatives or people receiving services. The agency recognizes the agency representative's rights to become involved in political activities of their choice. However, activities should not interfere with the agency representative's ability to perform their job and should not imply participation on the part of the agency.

f] Refrain from Substance Abuse and Unsafe Workplace Behavior

In order to provide a safe and healthful workplace for agency representatives and people receiving services and to promote an efficient and productive workforce Putnam County Comprehensive Services, Inc. representatives are prohibited from:

- Manufacturing, selling, purchasing, transferring, using or possessing illegal drugs, narcotics, or other unlawful substances or materials on the agency premises, or while conducting business for the agency.
- Manufacturing, selling, purchasing, transferring, using or possessing on the agency's premises, substance or materials not authorized by the agency (such as firearms, weapons, intoxicating beverages, drug paraphernalia, or medically authorized drugs used improperly or unsafely). However, the consumption of alcohol on special occasions shall be permitted with the prior written permission of the Executive Director.
- Reporting to the workplace or working if their ability to perform their job is impaired by the use of alcohol, a controlled substance, an illegal substance, or prescribed medication.

Agency representatives are subject to random and for cause drug tests at any time. Upon notification of either of these tests the person will be asked to take a test immediately. Failure to do so will result in immediate termination.

VI. Board Member Code of Ethics

As the Governing Body of Putnam County Comprehensive Services, Inc. the Board of Directors has responsibility for the care, management, and control of the agency and must be held to the highest of ethical and moral standards. The Board of Directors recognizes that established ethical standards of fairness, honesty and integrity are essential to the proper conduct of the

Board of Directors in upholding its governance responsibilities. Due to this additional level of responsibility and accountability all Board Members are expected to:

Putnam County Comprehensive Services, Inc.

CODE OF ETHICS

The mission of Putnam County Comprehensive Services, Inc. is to provide services to individuals with disabilities and similar conditions in order for them to reach their optimum potential in attitudes, habits and skills through training and integration, making them contributing members of their community and to promote community awareness and acceptance of people with differing abilities.

It is a goal of Putnam County Comprehensive Services, Inc., PCCS, to provide exemplary standards of performance, professionalism, and ethical conduct. PCCS fosters an environment of ethical conduct, where no member of the Board of Directors, staff, volunteer, or affiliate will ever feel the need to compromise corporate or individual integrity to help achieve a specific goal of the agency.

The PCCS, Inc. Code of Ethics sets forth values, ethical principles, and ethical standards to which the PCCS staff aspire and by which their actions can be judged. While PCCS's Code of Ethics cannot guarantee ethical behavior, resolve all ethical issue disputes, nor capture the richness and complexity involved in striving to make responsible choices, it does define PCCS's expectation of behavior within a moral community.

PCCS's Board of Directors and the staff are committed to making PCCS one of the most valued agencies in our field. We will accomplish this through a professional approach by saying what we mean, doing what we say, and making a positive difference in the lives of the people we serve.

PCCS will be accountable to the public by demonstrating the highest standards of integrity, fairness, honesty, and compliance with both the spirit and the letter of the law. PCCS aims to set the standard for ethical conduct by subscribing to the established Codes of Ethics for the various professions represented by our staff. In addition, PCCS endorses five basic principles:

HONESTY

to be truthful in all our initiatives, to be honest and forthright with one another and with persons served those on the waiting list for services, referral sources, and community partners.

RESPECT

to treat one another with dignity and fairness, appreciating the diversity of our workforce, the uniqueness of each employee, and the confidentiality of each stakeholder.

TRUST

to build confidence through teamwork and open, candid communication at all levels of the organization.

RESPONSIBILITY

to speak up without fear of retribution and report concerns in the workplace, including violations of laws, regulations, ethical standards, and PCCS policies, and seek clarification and guidance when in doubt.

CITIZENSHIP

to obey the laws of the land, work to make our communities more productive, and act with pride and confidence as a representative of PCCS, Inc.

We promise to apply integrity to all we do as related to: our staff, PCCS Board of Directors, volunteers, affiliates, financial practices, marketing activities, and services provided to individuals, referral/funding source interests, and other stakeholders' issues.

STANDARDS AND GUIDELINES OF ETHICAL BUSINESS CONDUCT

These Standards and Guidelines of Business Conduct are a guide to the ethical and legal responsibilities we share as members of the PCCS work family. This is not a complete rulebook that addresses every ethical issue that might arise. It is not a summary of all laws and policies that apply to PCCS's business. It is not a contract and it does not replace good judgment. Rather, the Standards and Guidelines of Ethical Conduct give us guidance and direct us to resources to help us make the right decisions.

TREAT IN AN ETHICAL MANNER THOSE TO WHOM PCCS HAS AN OBLIGATION: We are committed to the ethical treatment of those to whom we have an obligation.

For our employees, we are committed to honesty, just management, and fairness, providing a safe and healthy environment, opportunity for career growth, and respecting the dignity due everyone.

For persons served by PCCS, their families, and guardians, we are committed to treat them with respect, concern, courtesy, and responsiveness, recognizing that service to them is our primary responsibility.

For our customers, we are committed to produce reliable products and consumer-driven services, delivered in a timely manner, at a fair price, and with expected outcomes.

For the communities in which we live and work, we are committed to acting as concerned and responsible neighbors as we seek ways to share PCCS's mission with others, reflecting all aspects of good citizenship.

For our funding sources and governing authorities, we are committed to pursuing financial stability, sound growth, and to exercising prudence in the use of our assets in a manner that helps promote the improvement of programs and services to persons with disabilities.

OBEY THE LAW: We will conduct our business in accordance with all applicable laws and regulations. Compliance with the law does not comprise our entire ethical responsibility. Rather, it is a minimum, absolutely essential condition for performance of our duties.

PROMOTE A POSITIVE AND SAFE WORK ENVIRONMENT: All employees want and deserve a workplace where they feel respected, satisfied, and appreciated. Harassment or discrimination of any kind and especially involving race, color, religion, gender, age, national origin, disability, veteran or marital status is unacceptable in our workplace environment.

We are committed to providing a drug-free, safe, and healthy work environment. Each of us is responsible for compliance with environmental, health, and safety laws and regulations.

KEEP ACCURATE AND COMPLETE RECORDS: Transactions between PCCS and outside individuals and organizations must be promptly and accurately entered in our books in accordance with generally accepted accounting practices and principles. Entries into the case record must be made in a timely manner and reflect the desires and preferences of the persons receiving services, the services provided in response, and the actual outcomes achieved. Financial records and case record information must be treated with strict confidentiality.

STEER CLEAR OF CONFLICTS OF INTEREST: Playing favorites or having conflicts of interest, in practice or in appearance, runs counter to the fair treatment to which we are all entitled. Avoid any relationship, influence, or activity that might impair, or even appear to impair, your ability to make objective and fair decisions when performing your job.

CONDUCT MARKETING AND ADVERTISING ACTIVITIES FAIRLY, HONESTLY AND ACCURATELY: PCCS is committed to representing its facilities and services fairly, honestly, and accurately. Advertising, marketing, and promotional materials may not contain unfair, inaccurate, or deceptive statements or exaggerated or unwarranted representations. When information or images of persons served are used in marketing this will occur with their informed consent and in a respectful manner.

MECHANISM TO ADDRESS VIOLATIONS OF THE ETHICS: Accountability is one of the cornerstones of ethical organizations. Suspected violations of this Code are to be reported immediately to the PCCS Quality Assurance Director. No staff person will be penalized for making a good-faith report of suspected violations of these Standards or other illegal or unethical conduct, nor will PCCS tolerate retaliation of any kind against anyone who makes a good-faith report. A person who submits a knowingly false report will be subject to disciplinary action. Any allegation of violation of PCCS's standards of integrity will be taken seriously and thoroughly investigated in accordance with PCCS's policies.

Rules of Conduct and Ethic Principles for Providers Serving People with Developmental Disabilities

- 1) Professional services shall be provided with objectivity and with respect for the unique needs and values of the individual being provided services.
- 2) All PCCS employees or agents shall avoid discrimination on the basis of factors that are irrelevant to the provision of services, including but not limited to: race, creed, gender, age or disability.
- 3) All PCCS employees or agents shall provide sufficient objective information to enable an individual, or individual's guardian to make informed decisions.
- 4) All PCCS employees or agents shall accurately present professional qualifications and credentials.
- 5) PCCS shall accurately present professional qualifications of all employees or agents.
- 6) PCCS shall require all employees or agents to assume responsibility and accountability for personal competence in the practice of the person's profession and in the provision of services.

- 7) All PCCS employees or agents are required to maintain knowledge and skills for professional competence including all requirements necessary for a licensed or accredited professional to maintain the professional's licensure or accreditation.
- 8) All professional, licensed or accredited employees or agents of PCCS are required to adhere to acceptable standards for their area of professional practice.
- 9) All licensed or accredited employees or agents of PCCS are required to comply with all laws and regulations governing their profession.
- 10) All PCCS employees or agents are required to maintain confidentiality of individual information consistent with all laws and regulations governing confidentiality of individual information.
- 11) All PCCS employees or agents are to conduct all practice with honesty, integrity and fairness.
- 12) All PCCS employees or agents are required to fulfill professional commitments in good faith.
- 13) All PCCS employees or agents are required to inform the public and colleagues of services by use of factual information.
- 14) PCCS employees or agents will not advertise or market services in a misleading manner.
- 15) PCCS employees or agents shall not engage in uninvited solicitation of potential clients, who are vulnerable to undue influence, manipulation or coercion.
- 16) All PCCS employees or agents shall make reasonable efforts to avoid bias in any kind of professional evaluation.
- 17) PCCS shall notify the appropriate party, including but not limited to; the division, Indiana state department of health, a licensing authority, an accrediting agency, an employer, the attorney general, consumer protection division, of any professional conduct that may jeopardize an individual's safety or influence the individual or individual's representative in any decision making process.

Rules of Conduct and Ethic Principles for PCCS Board of Directors

- 1) All Members of PCCS Board of Directors will strive to uphold all applicable laws and regulations, going beyond the letter of the law to protect and enhance PCCS' ability to accomplish its mission.
- 2) All Members of PCCS Board of Directors will be responsible stewards of PCCS' resources. Acting as responsible stewards of the organization to prohibit waste, fraud, abuse and wrong doing.
- 3) All Members of PCCS Board of Directors will ensure that PCCS operates in a manner that upholds the agency's integrity and merits the trust and support of the public.
- 4) No Members of PCCS Board of Directors will take actions that could benefit themselves personally at the expense of PCCS, avoiding even the appearance of conflict of interest.
- 5) All Members of PCCS Board of Directors will treat others with respect; doing for others as they would have done for and to them in similar conditions.
- 6) All Members of PCCS Board of Directors will regularly attend and participate in board meetings and be responsible for establishing policies, objectives and long range plans.
- 7) All members of PCCS Board of Directors will vote to hire the best possible person to manage the agency and recognize that a Board member's job is to ensure that the agency is well managed, not to manage the agency.
- 8) All Members of PCCS Board of Directors will assure and maintain the confidentiality of the persons served and any discussions that could jeopardize the integrity of PCCS.

- 9) All Members of PCCS Board of Directors will carefully consider the public perception of their personal and professional actions, and the effect their actions could have on PCCS' reputation in the community or elsewhere.
- 10) All Members of PCCS Board of Directors will strive for personal and professional growth to improve their effectiveness as a PCCS Board member.
- 11) All Members of PCCS Board of Directors will serve as a Board Member without pay or monetary gain for such participation.

As a Representative of Putnam County Comprehensive Services, Inc I agree to uphold the above rules of conduct and Ethical Principles.

VII. Standards & Expectations

In addition to the Agency Code of Business Conduct and Ethics, Putnam County Comprehensive Services, Inc. has established written standards and expectation for all staff and managers. Putnam County Comprehensive Services, Inc. believes that these standards and expectations define the personal characteristics and qualities, which contribute to the fulfillment of its mission. They were developed with the understanding that each person has strengths and weaknesses, not all employees will have every identified characteristic and quality, but all will work toward the acquisition and mastery of them. These standards and expectations are separate into the following:

- Staff Standards and Expectation (Attachment A)
- Management Standard and Expectations (Attachment B)

The appropriate Standards and Expectations are reviewed and signed by all new staff during employee orientation.

VIII. Screening Applicants

Job applicants and other agency representatives who have been selected for employment or other positions within the agency must complete a series of background checks to assure that there are no historical/personal incidents involving the applicant, which would adversely affect their ability to carry out their job duties or call into question their personal character in performing their job. Applicants for positions requiring specific credentials and/or licensure are required to provide verification of such.

In addition to checking a person's criminal history (state and county), and depending on their position driving record and State Office of the Medicaid Inspector General and the US Department of Health and Human Services Office of the Inspector General exclusion database to determine whether or not the person or entity's participation in Medicaid or other government funded programs have been restricted, terminated or excluded.

Agency representatives are required to inform the Human Resources Manager immediately of any changes in their driving record (if an agency approved driver), criminal background and child abuse history. The Human Resource Manager will advise the Executive Director and Department Heads of any change reported.

IX. Compliance Officer & Compliance Committee

The Corporate Compliance Officer directs the Compliance Plan with the support of the Corporate Compliance Committee. The Human Resources Manager is designated as the Corporate Compliance Officer and reports directly to the Executive Director.

The Corporate Compliance Committee is comprised of Board Representatives, Administrative and Management Staff. The Corporate Compliance Committee will meet at least quarterly to review the status of the Corporate Compliance Plan, present and discuss potential compliance concerns and issues, and recommend changes to the program and/or department. The Board Representative's on the Corporate Compliance committee will report significant and pertinent information to the Board of Directors. The Corporate Compliance Board Representatives will ensure identified significant and pertinent information is included in the Board Meeting Minutes which will be distributed for review by the Agency Board of Directors during regularly scheduled meetings. (Attachment C)

X. Outside Legal Counsel

Outside legal counsel is available to assist the Executive Director, Board of Directors, Administrative Team, Compliance Officer and Corporate Compliance Committee as needed to identify and interpret federal and state laws and regulations in the Corporate Compliance Plan, assist in maintenance of the plan, and provide legal advice to Putnam County Comprehensive Services, Inc. with respect to any aspect of the Corporate Compliance Plan.

Outside legal counsel may be notified at the discretion of the Executive Director of incidents that have a reasonable cause to support the assertion of non-compliance, at which time the Compliance Officer will be responsible for facilitating an investigation. The results of the investigation will be used by legal counsel to provide legal advice to the Compliance Officer, Compliance Committee and Putnam County Comprehensive Services, Inc.

XI. Reporting Suspected or Known Violations

All Putnam County Comprehensive Services, Inc. representatives have a responsibility to report in a timely fashion any violations of the Agency's Code of Business Conduct & Ethics. The Corporate Compliance Plan encourages individual responsibility for reporting any activity by the agency representative or affiliate that reasonably appears to violate applicable laws and

regulations or Corporate Compliance requirements. Any notice regarding potential litigation against the Agency and/or suspected violations of law by the Agency must be reported to the Executive Director.

The Agency has an open door policy that encourages agency representatives to share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an agency representative's supervisor is in the best position to address an area of concern. Supervisors and managers are required to notify the Corporate Compliance Officer of any reported violations of the Agency Code of Business Conduct & Ethics. If the violation was reported verbally to the supervisor or manager, the reporting individual, with the assistance of the person they reported it to, shall write up the concern and forward it to the Corporate Compliance Officer.

When the agency representative is not satisfied with their supervisor's response, is not comfortable speaking with their supervisor, or if at any time the agency representative prefers he or she can contact the Corporate Compliance Officer directly. The agency has established a "Corporate Compliance Hotline." This reporting system provides agency representatives the ability to report potential Corporate Compliance violations 24 hours a day. The "Corporate Compliance Hotline" is accessed by calling 765-653-9763 ext. 105. And is a direct line to the Corporate Compliance Officer. Anonymous calls are accepted; however representatives are encouraged to leave detailed information. The "Corporate Compliance Hotline" may also be accessed for callers to pose questions regarding any compliance issues. Should the caller leave their name and number, the Corporate Compliance Officer will respond to any questions within 10 business days or less. Agency representatives can also contact the Corporate Compliance Officer (HR Manger) at 765-848-1673 or by forwarding a written message.

Any concern about the Executive Director should be reported to the Corporate Compliance Officer, who will in turn notify the Board President. A concern involving the Corporate Compliance Officer's actions or determinations should be brought directly to the Executive Director.

If any agency representative needs guidance on a legal or ethical question, has witnessed or has knowledge of an illegal or unethical activity, he or she should seek the counsel of the agency Corporate Compliance Officer. Failure to report could lead to disciplinary measures.

XII. Whistleblower Protection

The Whistleblower Protection is intended to encourage and enable agency representatives and others to raise serious concerns within the Agency prior to seeking resolution outside the agency.

Questions or concerns about any ethical, legal, and/or regulatory issues may be raised without concern for disciplinary action as long as they are made in good faith and there is reasonable

grounds for believing the information disclosed indicates a violation of the Agency Code of Business Conduct & Ethics.

Agency representatives will not be subject to reprisals for reporting or supplying information about potential violations, except in cases where those agency representatives are responsible for the violation or when deliberate false reporting has occurred. Agency representatives are also protected under this provision and the False Claims Acts against any form of retaliation for filing a False Claim lawsuit. It protects an agency representative who files a false claims lawsuit from being fired, threatened, harassed, or other forms of retaliation.

Any allegations that prove not to be substantiated and that prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Any agency representative who retaliates or harasses someone who has reported a violation in good faith is subject to disciplinary action up to and including termination of employment. It is expected that all Putnam County Comprehensive Services representatives will fully cooperate with any investigation of potential violation. Indiana Laws also protect employees from retaliatory practices. Additional details regarding these laws may be obtained by contacting a Human Resources Manager or visiting the Indiana Department of Labor website at www.in.gov/dol.

XIII. Investigations & Corrective Action

Any suspected violations will be investigated by the appropriate personnel, typically Compliance or Human Resources personnel. There are however investigations, depending on the severity, that may be assigned directly to a mid to upper level manager. All investigations are overseen by the Quality Assurance Director. All investigations will be treated confidentially to the extent consistent with corporate interests and legal obligations. Results of investigations into suspected violations will be documented and submitted to the Executive Director for review. If the results of an investigation indicated that corrective action is required, the agency will decide the appropriate steps to take, including discipline, dismissal and/or possible legal proceedings. If appropriate, the investigation may be turned over to applicable outside authorities, and outside investigators may assist in the inquiry.

XIV. Response & Discipline for Violations

Each agency representative is responsible for conducting him or herself according to legal and ethical standards. No one has the authority to make another person violate the agency Corporate Compliance Plan, and any attempt to direct or otherwise influence someone else to commit a violation is a violation in itself. Representatives who violate provisions outlined in this plan could be subject to appropriate disciplinary action, up to and including termination. In addition, violations identified in the Agency "Zero Tolerance Statement" (**Attachment D**) will result in immediate termination.

Agency representatives who violate the Corporate Compliance Plan may also be subject to substantial criminal fines, prison terms and civil damages for violating laws and government regulations.

XV. Compliance Training

All new agency employees are required to take the Corporate Compliance training during New Employee Orientation and annually thereafter. This introduction will include the nature and scope of the Corporate Compliance Plan, information on laws enacted to prevent and detect fraudulent billing (i.e. False Claims Act and the Program Fraud and Civil Remedies Act), methods to report violations, Whistleblower Protection, and disciplinary measures for violating the plan. The training may be supplemented by specific regulatory training and reminders geared toward the employee's responsibilities as needed throughout the year. Annually all employees will be required to sign the agency Code of Business Conduct and Ethics and Confidentiality Agreement.

All other agency representatives i.e. volunteers, consultants, committee members, and Board Members will receive the Corporate Compliance training through the assigned agency manager who will provide direct oversight to him or her.

XVI. Compliance Auditing

The agency Corporate Compliance Officer and Corporate Compliance Committee are responsible for ensuring that internal and external corporate compliance auditing takes place on a regular basis. Compliance related audits are conducted as a result of an investigation or as a proactive means of monitoring compliance in areas of actual or potential risk.

The Corporate Compliance Officer is primarily responsible for overseeing compliance auditing. This shall include, but is not limited to, periodic and regularly scheduled reviews of documentation, billing, claims processing and reimbursement procedures, quality of services, accounting practices, as well as practices that are mandated by agency policy and procedure to ensure adherence with federal and state regulations. Additionally, Putnam County Comprehensive Services, Inc. will utilize other Governmental and Regulatory Audits/Reviews as a method for obtaining feedback regarding compliance.

Audit findings and recommendations are reported to the Executive Director, the Corporate Compliance Committee, and the appropriate agency administrator. As needed or requested response plans will be completed by the operational management and incorporated into the final audit report.

XVII. Wrongful Billing

It is the expectation of Putnam County Comprehensive Services, Inc. that all service documentation will be an accurate reflection of services provided and that only those eligible to receive services per regulatory requirements will be billed for. Upon discovery or suspicion that the agency may have wrongly billed for services that were either not rendered or not allowable per regulatory requirements steps will be taken to investigate the situation and when necessary void or adjust the billing per agency guidelines. This also includes situations where the billing was submitted correctly to the Business Office, however was not processed correctly and thus a billing error occurred. Should it become evident that an employee of the agency knowingly submitted a false claim it will be reported to the Indiana Attorney General Medicaid Fraud Control Unit, 800-382-1039, and the person's employment will be terminated. In addition, the agency will monitor for other situations which may be appropriate for self-disclosure to the Bureau of Developmental Disabilities Services including, but not limited to:

- Substantial routine error
- Systematic errors
- Patterns of errors

XVIII. Certification

Upon the first day of employment or at the onset of the relationship with the Agency, the Community Services representative will receive a copy of the Agency Code of Business Conduct & Ethics for review and signature, as well as the Personnel Policy and Procedure Manual (Employee Handbook). In addition, all Agency employees will upon completion of the Corporate Compliance Training, receive certification that the agency Corporate Compliance Plan has been reviewed with them.

XIX. Conclusion

The Corporate Compliance Plan has been prepared to outline the board principles of legal and ethical business conduct embraced by Putnam County Comprehensive Services, Inc. It is not a complete list of legal or ethical questions you might face in the course of business, and therefore this plan must be used together with your common sense and good judgment. In addition, for specific guidance in certain areas covered by this plan, Putnam County Comprehensive Services, Inc. has adopted detailed policy and procedure manuals. If you are in doubt or have a specific question, you should contact your supervisor or the agency Corporate Compliance Officer.

Putnam County Comprehensive Services, Inc.

Staff Standards and Expectations

Putnam County Comprehensive Services, Inc. is committed to manage and operate its programs using the highest business, ethical and moral principles. All staff members contribute to achieving these principals by conducting business activities for the agency with integrity and high ethical standards. Exercising good judgment and being a good example to one's peers and people receiving services assists in creating a positive workplace environment in which compliance and ethical business conduct are expected. All Putnam County Comprehensive Services, staff are expected to strive towards and comply with the following standards and expectations:

I. Ethical and Professional Conduct

Ethical and professional conduct is an essential element of a good employee. Ethical personal conduct means treating oneself and others with respect and fairness. By maintaining the highest level of corporate integrity through open, honest and fair dealings, we earn trust for our services and ourselves. Putnam County Comprehensive Services expects all staff to act in a way that positively affects the reputation of the Agency with employees, volunteers, people receiving services and with the community at large.

A Community Services staff member:

- Maintains professional boundaries (Doesn't take behaviors of people receiving services personally, maintains confidentiality of personal information and phone number, keeps personal life separate, sets boundaries of the first day of services, respects other's positions across the agency, values other's time and schedules)
- Upholds integrity (is fair, truthful and honest)
- Respects the people we serve (Doesn't talk in the presence of people receiving services as if they are not there, encourages self-advocacy before intervening)
- Is respectful of co-workers (treats others with positive regard)
- Adheres to Agency policies and procedures
- Demonstrates support of the Agency's philosophies and mission
- Treats all people equally
- Respectfully discusses confidential issues privately
- Does not engage in gossip

II. Effectively Working With Others

Teamwork is a key component of effectively working with others and creating a positive workplace. All staff are expected to be willing to not just work alongside others, but to actively support the Agency mission and positively find ways to fulfill that mission. Effectively working together means not thinking of yourself as having one narrow set of duties. It means actively pursuing ways of working together; it means listening to each other with a willingness to adjust how you do your job, and respecting the needs and opinions of others.

A Putnam County Comprehensive Services staff member:

- Believes in teamwork (is a team player to ensure people are being served, is a resource and a help to other staff; is willing at times to go beyond the job description when needed, recognizes we are all working towards a common goal)
- Communicates to all necessary parties to ensure best support for people receiving services; gets feedback to ensure understanding
- Positively resolves conflict through proper channels.
- Works to be a good problem solver (interjects ideas, provides opinions that are helpful; creates a positive solution)
- Openly recognized other's achievements; acknowledges effort and accomplishment

III. Job Responsibility & Accountability

Each staff member is responsible for knowing and executing the responsibilities of his or her job. Each individual is held accountable for the quality of the work he or she produces. Staff should inform their supervisor if they are having difficulties completing their job responsibilities, are in need of assistance, and/or are uncertain regarding what their job responsibilities entail.

A Putnam County Comprehensive Services Staff member:

- Within bounds, is flexible and finds a way to meet the needs of people receiving services (i.e. Doesn't give up just because it is "not a billable service", is willing to have a flexible schedule if possible)
- Recognizes their own limitations; asks for help when needed to avoid burnout
- Works to address problems (actively problem solves; doesn't just leave things at "I didn't know what to do")
- Knows their job responsibilities and perseveres
- Is a good role model and teacher for people receiving services and others
- Is able to work independently, is reliable and self-initiating
- Accepts change; views change as an opportunity (isn't resistant to new procedures)
- Recognizes that behavior of people receiving services may be very difficult at times, and remains committed to service provision
- Creates systems to ensure smooth staff transitions, providing as much stability as possible for the people receiving services.
- Prioritizes workload; is time efficient; seeks supervisory feedback when having difficulty with time management
- Is a good planner; considers all possible outcomes, whether for work situations or behaviors of people receiving services
- Recognizes our focus is on the needs of the people we serve (doesn't conduct personal business at work and actively provides service)
- Pursues knowledge of individualized information for each person receiving services (diagnosis, behaviors, past trauma, etc.) to have more understanding and sensitivity and to provide better service

IV. Personal Characteristics & Abilities

Being able to deal effectively with individuals or groups representing widely divergent backgrounds, interests, and points of view are personal characteristics and abilities desirable of all staff. A good staff member is someone who is empathetic, genuine, open, and flexible. They respect their peers and people receiving services and are sensitive to their individual differences (e.g., gender, race, and ethnicity). Staff should be able to identify their own strengths and limitations as a person, and be able to recognize how their approach may need to be adjusted when interacting with peers and people receiving services.

A Putnam County Comprehensive Services staff member:

- Is empathetic and caring for people served
- Demonstrates patience with others, allowing them to grow and learn at their own pace
- Is dedicated and wants to provide stability to people receiving services
- Keeps a positive attitude even in difficult situations
- Creates a positive atmosphere
- Proactively seeks knowledge for tasks at hand
- Models acceptance of diversity

I understand that all Putnam County Comprehensive Services staff are expected to comply with these Standards and Expectations and agree that it is important for me to uphold these Standards for my own benefit and the benefit of all staff at Putnam County Comprehensive Services. I am, therefore, signing below to give my personal support to Putnam County Comprehensive Services commitment to manage and operate its programs using the highest business, ethical and moral principles.

Signed: _____

Print Name: _____

Date: _____

Putnam County Comprehensive Services, Inc.

Management Standards and Expectations

Putnam County Comprehensive Services is committed to manage and operate its programs using the highest business, ethical and moral principles. Supervisors and managers contribute to achieving these principles by exercising good leadership and being a good example in creating and promoting a workplace environment in which compliance and ethical business conduct are expected. All Putnam County Comprehensive Services managers are expected to comply with the following standards and expectations:

I. Ethical and Professional Conduct

Ethical and professional conduct is an essential element of a good management. Ethical personal conduct means treating oneself and others with respect and fairness. By maintaining the highest level of corporate integrity through open, honest and fair dealings, we earn trust for our services and ourselves. In addition, it is expected that managers will conduct themselves in a professional manner that reflects positively on the Agency's image and identity. No one should act in a way that adversely affects the reputation or image of the Agency with employees, volunteers, people receiving services or with the community at large.

- Be professional in dress, language and image (within and outside of the workplace)
- Actively role-model appropriate behaviors
- Proactively address unethical or unprofessional conduct
- Be respectful of yourself and others
- Remain dedicated and loyal to the Agency and the people we serve
- Demonstrate support of the Agency's philosophies and mission
- Uphold integrity (be fair, truthful, and honest)
- Be highly credible and trustworthy
- Be willing to admit when they are wrong

II. Supervisory Abilities

The ability to effectively employ a variety of supervision interventions, and deliberately choose from these interventions based on the employees learning needs, learning style, and personal characteristics are important supervisory characteristics of a good manager. Managers must be able to function effectively in the roles of teacher, counselor, and consultant, making informed choices about which role to employ at any given time with a particular employee. Manager must also be comfortable with the authority and evaluation functions inherent in the supervisor role, giving clear and frequent indications of their evaluation of the employee's performance.

A. General Supervisory Skills

- Clearly set realistic expectations and rules
- Give clear and concise directions
- Hold people accountable for performance
- Provide support to staff with actions, as well as words
- Apply your expectations and standards equally to all staff
- Adapt your supervisory style to how each individual best responds
- Have a vested interest in helping your staff succeed
- Be a team player (work side-by-side with staff)
- Hold yourself to the same standards you expect of others
- Be available to your staff when they need you
- Demonstrate leadership skills in all situations
- Be aware of your staff's needs and trends
- Be a good project manager; meet your own deadlines and expect staff to meet theirs
- Be sure you have, or learn, good organizational and planning skills

B. Communication Skills

- Provide straight-forward communication; don't leave staff guessing
- Provide full, honest and accurate reasons and responses
- Actively listen to your staff
- Actively inform staff of all on-going issues and changes
- Respectfully discuss confidential issues privately

C. Mentoring/Coaching Skills

- Seize every opportunity to be a teacher
- Formally and informally act as a mentor
- Help your staff with their career aspirations
- Encourage success
- Recognize when an employee is struggling and provide guidance to overcome barriers
- Show interest in staff as people
- Use strategies that are motivating and positive
- Allow staff the opportunity to balance their personal needs with work responsibilities
- Recognize and use all the talents and skills of your staff
- Encourage staff to feel ownership of their job
- Expect the best in others
- Help staff solve problems for themselves rather than providing them with solutions

D. Performance Feedback & Discipline Skills

- Provide feedback for staff performance on a regular basis
- Regularly recognize good performance
- Positively address performance issues before discipline is needed
- Be willing to discipline staff when it's truly needed
- Directly address staff problem behaviors individually, don't avoid them by sending out general memos or directives

E. Problem Solving Skills

- Be skillful at problem solving; learn to apply multiple strategies
- Actively address problems/concerns, don't avoid issues
- Be receptive to staff problems and solutions
- Do thorough research about a problem, investigating it before reacting
- Be willing to address staff conflicts.

III. Job Knowledge

Each employee is responsible for knowing and executing the responsibilities of his or her job. This means the individual is held accountable for the quality of the work he or she produces. In addition, managers are expected to ensure their employees have the necessary information, direction, and support to do their jobs.

- Be aware of day-to-day happenings
- Be knowledgeable about your own job
- Be knowledgeable about your staff's jobs
- Be knowledgeable about other departments and programs
- Be willing to research, learn about and find answers for areas you don't understand

IV. Personal Characteristics

Managers are expected to deal effectively with individuals or groups representing widely divergent backgrounds, interests, and points of view. A good manager is someone who is empathetic, genuine, open, and flexible. They respect their employees as persons and as developing professionals, and are sensitive to individual differences (e.g., gender, race, ethnicity) of the employee. Managers must have a clear sense of their own strengths and limitations as a supervisor, and be able to identify how their personal traits and interpersonal style may affect the conduct of supervision.

- Be resourceful; be open to suggestions and alternative methods of resolution
- Be accepting and sensitive to individual differences
- Act non-defensively, be level-headed and impartial
- Know your own strengths and weaknesses and work to compensate deficits
- Show a positive attitude; do not participate in damaging behaviors
- Be a team player, work well with other departments, colleagues and peers

- Always be approachable
- Take responsibility for your own behavior (Don't be a finger-pointer)
- Make decisions independently and swiftly
- Be invested in your job (Take your job seriously)

I understand the Standards and Expectations of all Management Staff and agree that it is important for me to uphold these Standards for my own benefit and the benefit of all staff at Putnam County Comprehensive Services, Inc.

Signature_____ Date_____

COPORATE COMPLIANCE COMMITTEE

I. Role & Responsibilities

The role of the Corporate Compliance Committee is to provide oversight for regulatory and legal compliance issues and ensure Putnam County Comprehensive Services, Inc. meets or exceeds the highest standards of regulatory and legal accountability, as well as ethical activity by agency employees, volunteers, contractors, officers and directors. In addition, the Corporate Compliance Committee's role is to advise the Corporate Compliance Officer and assist in the implementation of the Corporate Compliance Plan. The committee's responsibilities include:

- Analyzing the Agency's regulatory environment, the legal requirements with which it must comply and specific risk areas;
- Assessing existing policies and procedures that address these areas for possible incorporation into the compliance program;
- Working with appropriate departments to develop standards of conduct and policies and procedures that promote allegiance to the Agency's compliance program;
- Recommending and monitoring, in conjunction with the relevant departments, the development of internal systems and controls to carry out the Agency's standards, policies and procedures as part of its daily operations;
- Determining the appropriate strategy/approach to promote compliance with the program and detection of any potential violations, such as through the Corporate Compliance Hotline and other fraud reporting mechanisms;
- Developing a system to solicit, evaluate and respond to complaints and problems; and
- Monitoring internal and external audits and investigations for the purpose of identifying troublesome issues and deficient areas
- Implementing corrective and preventive action.

II. Statement of Confidentiality

Due to the extremely sensitive nature of certain Corporate Compliance Committee activities, i.e. employee discipline recommendations, etc., each member of the Corporate Compliance Committee will be held to the highest standards of confidentiality. Each Corporate Compliance Committee member will be expected to adhere to all Putnam County Comprehensive Services, Inc. Privacy Policies and Procedures. The information discussed at all Corporate Compliance Committee meetings will be considered confidential in nature. Putnam County Comprehensive Services Board Chairperson reserves the right to investigate any instance of potential breach of confidentiality and take appropriate remedial action up to and including recommendation for termination or in the case of a Board Member, removal from the committee and Board of Directors.

III. Structure

The Compliance Committee will include:

- Executive Director
- Human Resources Manager (Designated as the corporate Compliance Officer)
- Director of Quality Assurance
- Residential Director
- CARF Consultant
- Board Representative

The Corporate Compliance Board Chairperson or Board Chairperson at his or her discretion may attend the Corporate Compliance Committee and participate as a full voting member.

IV. Expectations

Each Corporate Compliance Committee member will be expected to:

- Review the meeting agenda and any/all associated documents in advance of the Corporate Compliance Committee meeting (Agenda to be prepared by the Compliance Officer and submitted in writing and/or electronically.)
- Attend regularly scheduled meetings and be prepared to discuss the agenda items based on their area of expertise.

V. Meeting Minutes & Frequency

Meetings will be held quarterly. The Corporate Compliance Officer will notify committee members of the schedule at the beginning of the calendar year. In addition to regularly scheduled meeting, Ad Hoc meetings may be necessary. The Corporate Compliance Officer is the only member of the Compliance Committee charged with calling an Ad Hoc meeting to address issues requiring immediate remediation.

Meeting minutes will be provided to each member of the committee in writing and/or electronically within one (1) week of the meeting. Any Corporate Compliance Committee Member wishing to make additions and/or changes to minutes must submit the requested additions and/or changes to the Corporate Compliance Officer in writing within one (1) week of the receipt of the Corporate Compliance Committee meeting minutes. The Corporate Compliance Committee meeting minutes will be considered approved by all members as is if no request for changes are received within one (1) week.

The Corporate Compliance Officer will submit written documentation of pertinent and significant compliance issues and activities to the Corporate Compliance Board Representatives for review, comment, and/or approval as appropriate.

VI. Potential Compliance Committee Agenda Items

The following is a list of possible agenda items for discussion at Corporate Compliance Committee meetings:

- Corporate Compliance Plan-review of the Corporate Compliance Plan
- Progress toward implementation/revision of any Policies and Procedures associated with Corporate Compliance Plan
- Review of any Compliance issues at hand
- Review of previously discussed remediation items
- Review of any new and/or revised Policies and Procedures for adoption and approval
- Review of on-going monitoring/internal audit activities
- Review of any and all new laws, issues, guidelines, etc. which affect the on-going compliance of Putnam County Comprehensive Services, Inc.
- Development of the Compliance Action Plan for the following year, as appropriate based on any trends and/or identified areas of vulnerability.

In the event that any one (1) Corporate Compliance Committee member must discuss a compliance issue which may involve another Corporate Compliance Committee member a request may be made requiring the individual to be removed from the meeting until a full discussion of the issue can be conducted after which time the removed Corporate Compliance Committee member will rejoin the meeting.

Zero Tolerance Statement

Putnam County Comprehensive Services, Inc. continues to vigorously strive for the highest standards at all times. We are committed to maintain a pleasant work environment that is desirable and create a rewarding experience for agency representatives. It is the responsibility of ALL agency representatives to maintain the highest standards of conduct for themselves. Every person has a responsibility to comply with the support of our Zero Tolerance Statement and to behave in a manner that is respectable.

The intent of this policy is to set the expectation for those behaviors that Putnam County Comprehensive Services has deemed as severe and unacceptable resulting in termination. When enforcing the zero tolerance standards, the following should be considered: the intent of the offender, the effect of the transgression on others (both those directly and indirectly involved) and finally the impact on the agency. The punishment should fit the “crime”.

“Zero Tolerance essentially means that no intentional behavior will be tolerated that is deliberately perpetrated with the purpose of harming others or the agency for personal gain or vengeance. Transgressions include but are not limited to: workplace violence, fraud, vandalism, theft of any kind, the use of any object as a weapon and/or conducting any type of illegal activity.”