



Corporate Compliance Code of Conduct

CHJC has implemented a Corporate Compliance Program, including a Code of Conduct applicable to all employees. Each employee is required to review the Code of Conduct and comply with the Corporate Compliance Program. CHJC will take disciplinary action for employees failing to report a suspected violation of the Corporate Compliance Program, participating in non-compliant behavior, and/or encouraging, directing, facilitating, or permitting non-compliant behavior.

As part of our Compliance Program, any employee convicted of a felony or misdemeanor must immediately make a confidential report of such conviction to the Human Resources Department. Any employee excluded from, or sanctioned by, either the Medicare or Medicaid program must immediately report that fact to the Compliance Officer. Failure to comply will result in disciplinary action up to and including termination. The Federal False Claims Act authorizes the use of civil penalties of between \$5,000.00 and \$10,000.00, plus three times the amount of damages the government sustains, when a person knowingly presents, or causes to be presented, a false or fraudulent claim; knowingly makes, uses, or causes to be made or used, a false record or statement to have a false or fraudulent claim paid; or conspires to defraud the government in connection with the payment of a false or fraudulent claim. In addition, under New York State law, it is a crime to knowingly and willfully provide false information or omit material information when billing for services. Submitting or causing a false claim to be submitted is an unacceptable practice under the New York State Medicaid Program, which can lead to fines and exclusion from the Medicaid program. In addition, there are both Federal and State laws related to kickbacks and inappropriate referrals that impose criminal and civil penalties for violations. Our Corporate Compliance Program was created to assist the organization in detecting fraud, waste and abuse so appropriate measures may be taken. Employees participating in the investigation of a possible False Claims Act violation may not be retaliated against.

Employee Behavior and Conduct: The welfare of CHJC depends upon the conduct and honesty of its employees and the trust and confidence of the general public. Our clients/youth and co-workers expect honesty, security, and confidentiality in their affairs. By accepting employment with CHJC, and as a condition of your employment, you have a responsibility to the Agency, your co-workers and its clients/youth to follow certain rules of behavior and conduct. Your relationship with Agency clients, youth and co-workers must be professional and business-like whether on or off the Agency's property. You must not disclose any information of a personal nature to the clients/youth. You should restrict sharing information of personal nature with co-workers. If you are asked personal questions by any client/youth, you must simply respond by stating "It is against Agency policy for employees to talk about their personal lives to any of the clients/youth." The Agency expects all its employees, interns, and volunteers to behave in a professional manner at all times. The Agency considers unacceptable conduct to include, but not limited to, the following:

- Willful violation of any safety, security, or other rules of the Agency;
- Negligence or any careless action endangering (or that could endanger) the life or safety of a client, youth, co-worker or other person;
- Sleeping on the job;
- Falsifying Agency records, reports, etc.;
- Improper use of computer systems and equipment;
- Destroying Agency records, reports, etc.;
- Supervisors or managers fraternizing with subordinates either on or off Agency property;

- Any employee fraternizing with clients/youth either on or off Agency property;
- Employees sharing confidential information about clients with other clients;
- Employees sharing personal information about co-workers with other co-workers past or present (ex. gossip, confidentiality, etc.);
- Involvement in activity or incidents outside of work considered detrimental to the agency, its clients/residents and its mission;
- Being intoxicated or under the influence of controlled substance drugs while at work or representing the Agency;
- Use or possession of controlled substance drugs in any quantity while on Agency premises or on Agency business (except medications prescribed by a physician);
- Unauthorized possession of firearms or weapons on Agency property or while on Agency business;
- Engaging in any criminal conduct or acts of violence (making threats, horseplay or provoking fights, negligent damage of property) either on Agency premises or when representing the Agency;
- Immoral conduct or indecency;
- Theft or the deliberate damage or destruction of Agency property or the property of an employee or client/youth;
- Any act of harassment, sexual, racial or other;
- Violation of the Agency's confidentiality policy;
- Not properly supervising clients/youth, leaving them unsupervised, allowing a noncleared person to supervise a client;
- Misuse of Agency vehicles and/or violation of related policy;
- Bringing contraband or personal property into work for clients/youth (i.e. cigarettes, chewing tobacco, inappropriate material, photos, DVDs, etc.);
- Dishonesty regarding sick time or other paid time off;
- Spreading of malicious gossip or behaving/speaking in a way that creates a negative and/or hostile work environment for others;
- Insubordination or refusing to obey Agency rules issued by your supervisor;
- Threatening or intimidating residents, clients, or co-workers both on and off the Agency premises;
- Obscene or abusive language directed to a supervisor, co-worker, resident, client or visitor;
- Excessive tardiness or absenteeism;
- Communicating with past clients/youth of CHJC either via phone, in person, through social media or other electronic/online methods, or through written communications;
- Communicating with current clients/youth of CHJC outside the normal course of business;
- Release of personal information by an employee to a client/youth. Some examples of personal information include, but are not limited to, the following:
 - "Do you have a boyfriend/girlfriend?"
 - "Do you drink? Did you drink when you were my age?"
 - "Do you use illegal drugs? Did you ever use them?"
 - "Where did you grow up? Where do you live?"
 - "Do you live with someone? What's your home phone number?"
 - "Have you ever been arrested?"
 - "Did you ever break the law?"
 - "Have you ever been in therapy?"
 - "Do you gamble? Buy lottery tickets?"
 - "How many brothers and sisters do you have? What are their names?"
 - "Have you ever been abused?"
 - "Do you love me? Are you my friend?"

Because of the seriousness of this issue, any violation of this policy may lead to immediate termination. These examples of prohibited conduct do not alter or limit the Agency's policy of employment at will. Any employee, who has questions concerning the issue of employee conduct, must immediately discuss them with their supervisor, the Human Resources Department or the Executive Director.

Confidentiality – Unless authorized to do so, revealing information about our residents/clients can be very harmful. In certain situations, revealing such information is illegal. You must not discuss information about our residents/clients outside or inside CHJC with anyone with no legitimate business right to the information.

Everyone, particularly our clients, has a right to privacy.

- Unless authorized by the Executive Director or other authorized personnel, employees must not disclose any information about a client to anyone outside the Agency, including the fact the person is, or is not, being served by our Agency.
 - Unless such discussion is in the necessary course of the Agency's business and in accordance with the Agency's policy, you must not give unauthorized information relative to the accounts of the Agency or its relations to others, and you must not discuss matters of a confidential nature relating to the Agency's affairs.
 - Even casual remarks can be misinterpreted and repeated so you must develop the personal discipline necessary to maintain confidentiality. Even if you hear, see or become aware of someone breaking this trust, you must immediately report this information to your supervisor or the Executive Director.
 - If you are asked questions by someone outside the Agency or your department/program, and you are concerned about the appropriateness of giving them certain information, remember you are not required to answer. Instead, politely refer the person to your supervisor or the Executive Director.
 - Without prior approval from the Executive Director, no one is permitted to remove or make copies of any records, documents or files of CHJC. You must also maintain confidentiality when storing or disposing of client records.
 - If served with a subpoena or other mandatory judicial or administrative process calling for the production of confidential information, you must immediately notify the Agency so it may take such action as it deems necessary to protect its interests.
 - You must inform the management of the Agency, without delay, of any fraud, false entry, substantial error, embezzlement or employee misconduct, which you discover or know to have taken place in any records, property or funds of the Agency and to report any transaction or matter that seems damaging to the Agency.
 - Whether you are on or off-duty, and even after you leave our employment, your employment with CHJC assumes an obligation to maintain confidentiality regarding the Agency's clients.
 - This confidentiality agreement shall not in any manner be construed as an employment agreement, and your continued employment with the Agency shall be in accordance with prevailing Agency policy.
- Because of the seriousness of this issue, any violation of this policy can lead to immediate termination.

Employee Access to other Departments: Agency employees shall have access to any Agency department during normal business hours provided access is required for the purpose of conducting Agency-related business and that such business will not cause disruption to that department's staff or clientele. Due to the sensitive nature of CHJC's mission and the importance of a safe environment for client care, employees must be respectful of our clients and their privacy. If in doubt as to whether information should be divulged, err in favor of not divulging information and discuss the situation with Agency management.