



## **BUSINESS FRAUD, ETHICS AND CORPORATE COMPLIANCE POLICY**

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**AT HOME COMPANIONS** aspires to the highest ethics, compliance with laws, regulations and service standards in relation to business operations and practices and direct service to customers

Therefore, it is the policy of **AT HOME COMPANIONS** to assure compliance with all laws, regulations, and accreditation standards to help maintain operations in an ethical manner. The Governing Authority has final judgment on all business ethics and compliance decisions. All employees are to conduct themselves in a principled manner and in compliance with laws, regulations, and accreditation standards, this includes providing proof of certification or licensure. Failure to do so may result in disciplinary action. A Code of Ethics is provided each employee, which includes the assignment to the appropriate level of care, excluding unauthorized employees from performing personal care. Annual reports to the Governing Authority on incidents of misconduct or violations are prepared and evaluated. This policy statement will be distributed to the general public and referral sources annually. Reports of misconduct, safety concerns or violation can be made by anyone within the prescribed procedure, including licensing and/or regulatory agencies, the Compliance Officer and are held in confidence. **AT HOME COMPANIONS** will cooperate with all reasonable and lawful demands made by government investigators or law enforcement agents and no documents will be altered or destroyed in anticipation of a request by a lawful investigation.

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### **PROCEDURE:**

1. It is the determined policy of **AT HOME COMPANIONS** and its employees to adhere to sound and lawful business practices and comply with all laws, regulations, accreditation standards and guidelines. Therefore, a Business Ethics and Compliance Plan (BEC) has been established for employee conduct and delineates the consequences for failure to adhere to the accepted ethics and compliance practices within **AT HOME COMPANIONS**.
2. Components of the plan include the elements involved in plan oversight, monitoring and evaluation, distribution of the plan to employees and clients, reporting procedures, and establish the approach to outside investigations as well as the provision for enforcement of the plan.
3. New employees will be informed of the BEC Plan during orientation. Documentation will be placed in their personnel record.



4. The business ethics and compliance statement will be distributed to the community annually and to all clients at admission.
5. The Governing Authority will review the BEC plan and its findings annually through the reports made by the appropriate Committee.
6. The Governing Authority shall appoint an independent Compliance Officers and charge the Professional Advisory Committee with advising the Governing Authority on compliance and ethical issues and overseeing the AT HOME COMPANIONS compliance program.
7. All reports of misconduct or violations of law are to be considered serious and are to receive immediate attention with a full investigation. Reports of any misconduct, unethical business practice or violation of laws and accreditation standards and guidelines can be made by anyone. The occurrence must be reported to the Chief Executive or Compliance Officer and include the name of the accused person(s), act(s), and date(s) of the suspected violation. The Chief Executive will meet with the staff member(s) making a report of misconduct or violation of the law as the first step in the investigation process. All reported incidents are investigated within five (5) days of the report, including those reported by the Compliance Officer. The Compliance Officer will report annually to Governing Authority.
8. The Compliance Officer is Ken Wessel, MSW, ACSW, LSW, Orchard Hill Management, orchardhillmgt@optonline.net.
9. Employees will be protected under the CEPA Law (Conscientious Employee Protection Act). Which means AT HOME COMPANIONS prohibits taking any retaliatory action against any employee because the employee in good faith discloses or threatens to disclose violations of law, unethical, or fraudulent acts.
10. The Governing Authority shall annually review all reported violations or incidents of misconduct and compliance, the findings of all internal audits to include admissions, reimbursement, accounts receivable, delinquent accounts, and staff expenses. The Governing Authority shall have final judgment on all business ethics and compliance decisions.
11. AT HOME COMPANIONS has adopted a Code of Ethics that clearly outlines expected conduct and is displayed in office.
12. Failure by any employee to report unethical or unlawful practices or actions is misconduct warranting disciplinary action. However, any employee who raises a complaint under this policy in bad faith, or for the purpose of harassing another employee, or who repeatedly raises meritless complaints hereunder, will be subject



to disciplinary action, and such disciplinary action will not be deemed retaliation under this policy.

13. AT HOME COMPANIONS and its employees will cooperate with all reasonable and lawful demands made by finding agencies, governmental investigation or law enforcement agents. Written, copied or electronic documentation is not to be altered or destroyed in anticipation of a request or as a result of a request *for* those documents by any authorized lawful investigation.