

Section 8: Corporate Compliance

Policy Number: 8.1

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Agency Policy: Code of Conduct

All employees, independent contractors and Board members must know, understand, and follow the Warren, Washington & Albany Counties ARC (WWAARC) Code of Conduct because it is an integral component of our Corporate Compliance Plan and provides guidance to all employees and assists us to carry out our daily activities within appropriate ethical and legal standards. The WWAARC Code of Conduct can be found as an attachment to this policy.

Procedure

Employees

At a minimum, each staff member will be provided with a copy of the Code of Conduct at the time of initial Corporate Compliance training.

New staff will be trained on our Code of Conduct within ninety (90) days of hire and will sign an acknowledgement of the Code of Conduct at that time, indicating his or her understanding and commitment to follow the Code of Conduct.

All staff receives annual training that includes the Code of Conduct. At that time the employee will be required to re-sign the acknowledgment form.

Employees may also receive a “refresher” review of the Code of Conduct if their behavior warrants such action.

Supervisors

While all employees are obligated to follow our Code of Conduct, the WWAARC administrative team is expected to set an example. We expect all WWAARC supervisory employees to:

- Exercise their responsibilities in a manner that is kind, sensitive, thoughtful, and respectful. We expect each supervisor to create an environment where all employees feel free to raise concerns and propose ideas;

Ensure their employees have sufficient information to comply with laws, OPWDD regulations and WWAARC policies and procedures, including but not limited to those related to the Corporate Compliance Plan, and to resolve ethical dilemmas. Supervisors must create a culture within WWAARC which promotes the highest standards of ethics and compliance.

Independent Contractors and Agents

Independent contractors and agents will be provided with a copy of the Code of Conduct at the time of entering into a written agreement with WWAARC.

Each independent contractor and/or agent will sign an acknowledgment of the Code of Conduct at the time of initial contracting indicating his or her understanding and commitment to follow the Code of Conduct.

Board Members

Each Board member shall be provided with a copy of the Code of Conduct at the time of Board orientation and annually thereafter.

Each new Board member will be oriented within three (3) months of joining the Board on the Code of Conduct and will sign an acknowledgment of the Code of Conduct at that time, indicating his or her understanding and commitment to follow the Code of Conduct.

The Warren, Washington & Albany Counties ARC

Code Of Conduct

Mission

Warren, Washington & Albany Counties ARC (WWAARC) is respectfully committed to providing services, advocating for, and offering opportunities to people with intellectual or other developmental disabilities and their families; by supporting them in the realization of their fullest potential.

Our Vision

Our vision is to secure a future where all people with intellectual or other developmental disabilities are respected as full members of communities that embrace and celebrate the diversity of all people by connecting them with opportunity.

Values

We value the dreams, aspirations, and goals of persons with intellectual and developmental disabilities and their rights to a full, productive, and responsible role in society.

We value the rights of persons with intellectual and developmental disabilities to make their own choices.

We value diversity in membership and leadership.

We value the dedication and commitment of the staff who support people with intellectual and developmental disabilities.

We value being family-led and professionally managed.

Commitment to the people we support

We are committed to providing the highest quality of care, in a professional, caring, and compassionate manner. We are committed to fostering an environment whereby the people we support are encouraged to play a decision-making role at the Warren, Washington & Albany Counties ARC (WWAARC) and to become a contributor in their home and work environments.

Commitment to staff

Teamwork: To work together to do the job right the first time.

- Integrity:** To always be fair, honest, and trustworthy.
- Excellence:** To improve each day, and to strive for the highest level of quality in our performance.
- Respect:** To treat each person and their family with dignity and respect, and to listen.
- Stewardship:** To manage our resources responsibly.

Commitment to communities we serve

We are committed to being a good corporate citizen and to support our employees and the people we support in the fulfillment of their civic duties and their pursuit of charitable endeavors.

Commitment to our third-party payers

We are committed to working with our payers in a way that demonstrates our commitment to our contractual obligations and reflects our shared concerns for quality services in an efficient and effective manner. We encourage our payers to adopt their own set of ethical principles that recognize their obligations to the people we support, as well as the need for fairness between providers and payers.

Commitment to our Regulators

We are committed to creating an environment in which compliance with applicable rules, laws and regulations is woven into the fabric of WWAARC. We accept responsibility to self-govern and monitor adherence to requirements of law and our Code of Conduct.

Commitment to our Suppliers

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

Code of Conduct

We believe that certain rules of conduct must be observed to promote a positive and ethical work environment and pledge to abide by the laws, regulations and policies and procedures, including, but not limited to those related to the Corporate Compliance Plan.

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

- To work cooperatively and respectfully with all WWAARC employees, board members and agents to provide the highest quality of services;

- To place the interests of the people we support and their family members first and foremost in all aspects of what we do;
- To represent WWAARC positively in the community-at-large;
- To conduct all activities in a fiscally responsible manner;
- To work in accordance with applicable laws, regulations and WWAARC policies;
- To seek training and assistance in areas that would strengthen the ability to fulfill responsibilities to people we support and WWAARC;
- To avoid conflicts of interest, including the acceptance and giving of other than incidental tokens of appreciation;
- To conserve resources of WWAARC by not engaging in wasteful behavior;
- To respect the privacy of the people we support and fellow WWAARC employees by keeping private information confidential.
- To complete tasks in a timely manner and meet expectations for the quality of work that WWAARC strives to achieve;
- To bill people we support and third-party payers accurately;
- To report to a supervisor or to the Compliance Hotline any potential violation of applicable laws, regulations, and policies, including the Corporate Compliance Plan;
- To respect the role of the board and management and to fully implement their decisions; and
- To consult WWAARC leadership when questions arise as to the conduct permitted under applicable laws, regulations, and policies, including the Corporate Compliance Plan.

It is not possible to list all the forms of behavior that are considered unacceptable in the workplace, but the following are examples of infractions of rules of conduct that may result in disciplinary action, including suspension, demotion, or termination of employment:

- Abuse or neglect of the people we support.
- Engaging in criminal conduct whether or not related to job performance;
- Theft or misuse of any funds or property belonging to the agency, staff, or the people we support, including cash, vehicles, or personal possessions.
- Deliberate or careless damage of agency, staff, or individual property.
- Use, possession, sale, transfer, or distribution of unauthorized alcohol or illegal drugs on agency property, in agency residential homes on WWAARC Janitorial contract sites, remote work sites or while working for WWAARC
- Reporting to work while under the influence of alcohol or illegal drugs.
- Falsification of employment records, employment information, or other records
- Possession of firearms, explosives, fireworks, or weapons on agency property or on premises owned or occupied by WWAARC.
- The removal or borrowing of Agency property without prior authorization from the Executive Director or designee.

- Recording the work time of another employee, allowing any other employee to record your work time, or allowing falsification of any timesheet, whether your own or another employee's.
- Provoking a fight, fighting, or engaging in horse play while on Agency premises, on duty, or while conducting Agency business regardless of location (offsite).
- No-call, No-show – Not reporting to work as assigned.
- Insubordination, including but not limited to the failure or refusal to obey any legal written or verbal directive of the chain of support.
- The use of abusive or threatening language toward those we support, other employees, Agency volunteers, supervisor, members of administration, or others while on duty or conducting Agency business.
- Using profane or abusive language at any time during working hours or while on premises owned or occupied by WWAARC.
- Going “AWOL” – Failing to obtain permission from a member of the chain of support before leaving work for any reason during scheduled working hours.
- Poor or otherwise unacceptable work performance.
- Sleeping while scheduled to work, unless working a “sleep” shift.
- Excessive or inappropriate phone usage.
- The abuse of paid sick leave.
- Smoking in Agency vehicles or buildings owned or leased by WWAARC.
- Smoking/vaping in personally owned vehicles with any person supported by WWAARC or with any other employee of WWAARC.
- Working overtime without authorization or refusing to work assigned overtime.
- Violating any federal or state law or regulation or any policy or procedure of WWAARC.
- Violating any safety, health, or security policy, rule, or procedure of WWAARC.
- Gambling during scheduled working hours.
- Committing a fraudulent act or a breach of trust in any circumstances.
- Failure to sign a counseling memorandum.
- Failure to immediately (within 24 hours) notify WWAARC of an arrest.
- Dishonesty in interactions and/or investigations.
- Use of personal cell phone or any other device to video, photograph, record or otherwise violate confidentiality and HIPAA laws designed to protect the privacy of the people we support.

You must immediately report any violation of the rules of conduct as described above to your supervisor.

WWAARC does not have a formal progressive discipline policy requiring a set number of warnings or counseling sessions. Instead, each situation is considered based on its own facts. In cases of misconduct or violation of WWAARC policy, immediate termination may be appropriate depending on the facts.