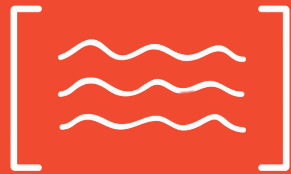


ADAPT  
OF THE HUDSON VALLEY



# CODE OF CONDUCT

[ [adapthv.org](http://adapthv.org) ]

## Welcome to ADAPT of the Hudson Valley

Welcome to ADAPT of the Hudson Valley. We hope that you find your work here enjoyable and rewarding. No matter what your role, from working directly with the children, adults, and families we support, to keeping our facilities up and running to providing financial and administrative support, please know that we are completely dependent on you to continue to provide those services well.

Because we are all dependent on one another, and because we are completely funded by government, it is necessary for us to adhere to a Code of Conduct which tells the world we perform our roles ethically with respect for all.

It is important therefore that you read and understand everything in this booklet thoroughly and completely. It will help you do your job better, ensure that your work relationships are respectful, and help us all from making mistakes that, even unintentionally, cause harm to ourselves or those we support.

We are very glad you're here. Thank you.

## Our Mission

***Empowering people through innovative solutions, one person at a time.***

Our values are connected to our mission and reflect a commitment to:

- The **provision of services of the highest quality** to people of all ages with developmental disabilities and their families
- Adherence to the highest ethical, business and legal standards
- The avoidance of even the appearance of dishonesty and wrongdoing
- The adherence to ADAPT of the Hudson Valley's Compliance Program as an integral part of our mission and operations

### Work Environment

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ADAPT of the Hudson Valley is committed to creating and maintaining a **safe and professional workplace**. It is ADAPT of the Hudson Valley's policy to treat everyone with respect. Business integrity, teamwork, trust, and respect are ADAPT of the Hudson Valley's most important values. Unlawful discrimination or harassment of any sort violates these values.

## Our Compliance Program

ADAPT of the Hudson Valley promotes **responsible, honest conduct and transparency** in all business transactions and adherence to the laws and regulations of the government agencies that fund our work and promulgate standards of care. In order to achieve these important goals, ADAPT of the Hudson Valley has developed a comprehensive **Compliance Program** which facilitates the prevention of improper or illegal activities and provides mechanisms to detect and report any violations.

### What We Ask of You

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- Comply with this Code of Conduct and all agency policies and procedures.
- Obey all laws and regulations that govern our work.
- Report any alleged violations or allegations of wrongdoing immediately to one of the following:
  - Your immediate supervisor
  - A manager
  - The Compliance Officer
  - The Director of Human Resources



The agency maintains a telephone hotline to allow employees and others to report problems and concerns either anonymously or in confidence. This telephone number is posted in all programs.



- Assist management and compliance personnel in investigations of wrongdoing.

### Freedom from Retaliation and Intimidation

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The agency is committed to **protecting from retaliation and intimidation**, its employees and others who in good faith report problems and concerns.

## Providing Quality Care

**Our goal is to provide services of the highest quality using the most innovative techniques.** We strive to be responsive to the concerns of the people we support and to provide an environment sensitive to the rights and dignity of all.

## Protecting Information

During your relationship with ADAPT of the Hudson Valley you may acquire confidential information about the people we support, ADAPT of the Hudson Valley employees, and the agency's finances, operations and programs. You must keep this information confidential. The agency has developed a comprehensive program to comply with the **Health Care Information Portability and Accountability Act (HIPAA)**. You must follow these policies and procedures to ensure that health care information is kept confidential.

**No one may copy, remove, or disclose confidential information from ADAPT of the Hudson Valley property without permission from a supervisor or administrator with proper authority over the information.** Ask your supervisor if you are not sure whether certain information is confidential.

## Compliance with Law

Much of ADAPT of the Hudson Valley's financial support comes from government. Therefore, we are subject to laws designed to combat fraud, waste and abuse.

**ADAPT of the Hudson Valley is committed to compliance with all federal, state, and local laws and regulations**, including requirements of New York's Medicaid program and all Federal health care programs that govern the programs it administers.

### Guidelines

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- **Kickbacks**

You may not offer or accept any kickback or rebates in any form for any reason. This means that you cannot give or receive anything of value in return for a referral of business.

- **Gifts, Gratuities and Entertainment**

You may not solicit or accept money or other gifts from providers, contractors, producers, accounts, people supported, or their families.

We understand that some families may wish to express their gratitude to staff through the presentation of small gifts. You are permitted to accept gifts of nominal value.

However, there can be no personal financial transactions between our staff and the families of the people we support.

**ADAPT of the Hudson Valley employees and contractors may not offer gifts of even nominal value to any government official.**

## Conflict of Interest

**Conflicts of Interest** are situations in which personal considerations may affect or appear to affect, our loyalty and ability to fulfill our responsibilities to ADAPT of the Hudson Valley and the people we support. You must not allow any outside financial interest, or competing personal interest, to influence the **decisions or actions** that you make on behalf of ADAPT of the Hudson Valley. You must avoid both the existence and the appearance of any conflict of interest between your personal interests and those of the agency.

There are many types of situations where potential conflicts may arise. ADAPT of the Hudson Valley requires you to **report promptly any actual or potential conflict of interest** to either your immediate supervisor or to the Compliance Officer.

# Creating a Positive Work Environment

## Guidelines

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- You must support ADAPT of the Hudson Valley's commitment to a **safe and professional work environment**.
- You must demonstrate **appropriate behavior** in the workplace.
- You may not make jokes or speak or communicate in a **derogatory manner** about anyone's race, sex, age, religion, national origin, color, marital status, disability, or other protected characteristics.
- You **may not consider** anyone's race, color, religion, sex, national origin, age, disability, culture, ancestry, gender identity, sexual orientation, appearance, political affiliations or other protected characteristic when making decisions about the work environment, including hiring and retention, placement, assignment of duties, training and promotion, termination, compensation and benefits.
- **ADAPT of the Hudson Valley prohibits sexual harassment of any kind.** Sexual harassment includes:
  - any form of unwelcome sexual advance
  - request for sexual favors
  - other verbal or physical conduct of a sexual or sex-based nature.
- You must treat all people served by the agency, co-workers and visitors with **respect, courtesy and cooperation**.
- You are a representative of ADAPT of the Hudson Valley in your everyday life. You must represent the agency positively in the community.
- You are urged to care for your own health. Therefore, you must never possess, distribute, sell, purchase or use controlled substances or alcohol while you are working and/or are on agency premises. You must not come to work and/or to agency premises if your ability to perform your job is impaired by alcohol, an illegal substance, or a prescribed medication.
- You must never bring weapons to work and/or agency premises.
- You must immediately report any allegation of possible abuse of people supported.
- You must **never leave people supported unsupervised** or in an inadequately supervised setting.

## Social Media

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We are committed to cultivating a positive reputation in the community. To further support our mission, we engage in social media and networking for marketing and communication purposes. ADAPT of the Hudson Valley requires that employees **respect**

**the rights and privacy of the persons we support** and the reputation of ADAPT of the Hudson Valley when engaging in social media.

- Do not post any pictures or comments involving ADAPT of the Hudson Valley or other employees that could be construed as inappropriate.
- Do not post any pictures or videos of the people we support that have not been officially posted to the agency's official site. Only pictures officially posted will have proper releases and permissions for use.

## Use of Agency Funds and Resources

Use of ADAPT of the Hudson Valley's assets are strictly for the benefit of ADAPT of the Hudson Valley and the people ADAPT of the Hudson Valley supports. These assets include physical property like funds, equipment, furniture, office supplies and vehicles. ADAPT of the Hudson Valley's assets also include intellectual property like financial information, computers, computer software, email, and business information.

**You may not conduct outside activities during work time**, unless approved by your supervisor. Such activities interfere with your regular duties and negatively affect your work.

## Ineligible Persons or Entities

ADAPT of the Hudson Valley does not contract with, employ, retain, or bill for services rendered by an individual or entity that is excluded or ineligible to participate in federal or state healthcare programs. ADAPT of the Hudson Valley checks the eligibility status of all employees and independent contractors as a part of the hiring/retention process. After hiring, ADAPT of the Hudson Valley routinely checks the eligibility status of all employees and independent contractors. If you become ineligible or excluded from participation at any time, report this immediately to the ADAPT of the Hudson Valley Compliance Officer. If you become aware that any other person or entity with whom ADAPT of the Hudson Valley has a business relationship has become ineligible or excluded, also report this immediately to the ADAPT of the Hudson Valley Compliance Officer.

## Record and Report Information Accurately

Many of ADAPT of the Hudson Valley's forms are legal documents. These documents verify the provision of a service, constitute a bill for a service to a person supported, record a job task, record specific occurrences, or cover other matters. All such documentation completed or

compiled by you must be prepared **fully, accurately and honestly**. In addition, you must only document the services that you provided or events in which you were involved.

## Documentation

- We handle claims for payment of services with integrity to avoid fraud, waste and abuse in healthcare.
- All ADAPT of the Hudson Valley personnel are expected to comply with federal healthcare program requirements, including, but not limited to, Medicare/Medicaid rules and federal and state False Claims Acts.
- We bill only for medically necessary services rendered by eligible providers and properly documented and coded.
- We correct any billing errors of which we have knowledge and refund payments received in error.

If you see problems with claims that are not being corrected, contact the Compliance Officer or Compliance Hotline.

## Information Security

- You must only use information produced by or stored on ADAPT of the Hudson Valley's computer systems—whether in electronic form or hard copy—for legitimate ADAPT of the Hudson Valley purposes.
- Use computers, internet access, email, or other office communications systems for business-related purposes only. Do not use them in a disruptive, offensive, harassing, or harmful manner, or for any personal purposes.
- Do not share your system username or password with anyone.
- Do not allow anyone to access any ADAPT of the Hudson Valley computer or network with your password.
- ADAPT of the Hudson Valley requires you to comply with its Acceptable Use Policy. If you have any questions concerning information security, contact your supervisor, the Compliance Officer, Director of Information Technology or Security Officer.
- Any document produced or provided by you as an ADAPT of the Hudson Valley employee, independent contractor, volunteer, or officer is the sole property of ADAPT of the Hudson Valley. You may not destroy it or use it for any other purpose.

## Political Activities and Contributions

ADAPT of the Hudson Valley is a non-profit organization. Under the law, non-profit organizations may not engage in any political campaign activities. You must **never represent your personal activities, opinions or interests as those of the agency** (e.g. by unauthorized use of agency letterhead stationery, unauthorized remarks in public, etc.).

## Corrective Action and/or Discipline

As a condition of employment or retention, you must comply with the Code of Conduct, ADAPT of the Hudson Valley's policies and procedures, all applicable laws or regulations, and report potential compliance violations.

Any ADAPT of the Hudson Valley employee, independent contractor, volunteer, or officer who violates or knowingly fails to report any violation of this Code of Conduct, any applicable law or regulation, or ADAPT of the Hudson Valley policy, procedure, or practice is subject to appropriate disciplinary action ranging from a documented verbal warning to termination. The specific disciplinary action imposed will depend on the nature of the incident and the relevant surrounding circumstances.

### **The following are grounds for discipline, up to and including termination, if not corrected:**

- Not performing all duties listed on your job description, as assigned by your supervisor.
- Frequent lateness, excessive, unexcused absences and/or unauthorized leaving of work site or shift.
- Absences or lateness without notifying your supervisor within the required timeframe.
- Not calling or showing for a scheduled shift.
- Not signing in and out of the program or not accurately signing in or out of the program.
- Failure to attend required trainings or medication courses.
- Failing to report an allegation of abuse.
- Refusing to participate in an agency investigation.
- Lying in an investigation.
- Smoking/vaping or using smokeless tobacco products on agency premises.
- Violating safety and/or security rules and regulations.
- Leaving people supported unsupervised or in an inadequately supervised setting.
- Not completing required paperwork.
- Signing in and/or out for another employee.
- Not properly caring for the property of people supported and the agency.
- Producing insufficient or unacceptable work.
- Not administering medication to persons supported as prescribed and/or in accordance with established schedule.

**The following are serious infractions of agency policies and procedures which could subject an employee to disciplinary action up to and including discharge:**

- Abusive behavior: physical, verbal, psychological or sexual to people supported, volunteers or co-workers.
- Being under the influence of intoxicants while on the job. This includes marijuana, drugs and all forms of alcohol.
- Insubordination
- Sleeping on duty
- Stealing from the agency, its employees or people supported.
- Engaging in destructive acts, such as tampering with or destroying property of the agency, its employees and people supported.
- Falsifying agency records or reports, including obtaining employment based on false or incomplete information.
- Unauthorized use of an agency vehicle.
- Committing an illegal act on agency premises.
- Failing to cooperate in an agency or governmental investigation.

## Your Responsibilities

- You are expected to perform the duties listed in your job description.
- You are expected to assist other staff as needed and when requested.
- You are expected to perform all tasks as assigned by your Supervisor.
- You are expected to treat the people supported, staff and visitors with courtesy, respect and cooperation.
- You are to support and maintain the good reputation and the integrity of the agency at all times.
- You are expected to report all incidents of physical, verbal or psychological abuse, by staff to people supported or by people supported to staff.
- You are to abide by agency policies and procedures.
- You are to complete all required paperwork.
- You are not to engage in the private sale or distribution of unauthorized literature or goods while on duty as an ADAPT of the Hudson Valley employee or on ADAPT of the Hudson Valley premises.
- You are to provide the required notice to management when reporting late or calling out.
- You are not permitted to smoke/vape or use smokeless tobacco products in any agency facility or vehicle.
- You are expected to attend in-service trainings, participate in fire drills and emergency evacuation procedures and abide by the safety and security procedures of your program.

- You are expected to maintain regular attendance; report to work punctually and be free from the impairment of drugs or alcohol.
- You are required to not leave a work site or not be at an assigned location without prior authorization from the supervisor or Program Director.
- You are expected to attend all required Compliance trainings and read and understand the following:
  - ADAPT of the Hudson Valley’s Compliance Plan
  - Compliance Policies and Procedures
  - Code of Conduct
- Promptly report any issues, concerns, violations, or suspected violations to
  - your supervisor
  - other management staff
  - the Director of Human Resources
  - the ADAPT of the Hudson Valley Compliance Officer

<u>Version Number</u>	<u>Summary of Changes</u>	<u>Effective Date</u>
1.0	Initial Version	2.26.24



## Acknowledgement

I acknowledge that I have received, read and understand the Code of Conduct of ADAPT of the Hudson Valley.

I agree to abide by the policies in the Code of Conduct and all federal, state, and local laws, rules and regulations in connection with my work with ADAPT of the Hudson Valley.

I am aware that violations of the Code of Conduct could result in disciplinary actions.

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Signature

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Printed Name

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Date



**ADAPT of the Hudson Valley  
COMPLIANCE PROGRAM**

**PURPOSE:**

**ADAPT of the Hudson Valley (“ADAPT HV”) is committed to providing services of the highest quality to people supported and their families. In doing so, ADAPT HV strives to be in full compliance with all Federal, State, and local laws and regulations. ADAPT HV recognizes that a critical aspect of our Compliance Program and Code of Conduct involves fostering a culture that fully promotes responsible, honest conduct, and transparency in all business transactions. ADAPT HV strives to follow the laws and regulations of the government agencies that fund our work and promulgate standards of care. To achieve these important goals, ADAPT HV works to facilitate the prevention of improper, unethical, or illegal activities and to implement mechanisms to detect any violations. ADAPT HV takes prompt action to resolve instances of conduct that do not conform to federal, state, and private payer healthcare requirements, general legal standards, as well as ADAPT HV’s Code of Conduct and business policies.**

**ADAPT HV is committed to protecting any Affected Individuals who in good faith report problems or concerns from any form of intimidation or retaliation. Affected Individuals include employees, the chief executive, senior administrators and managers, contractors, agents, subcontractors, independent contractors, the governing body, and corporate officers. A threat or act of intimidation or retaliation against any Affected Individual who has reported improper or illegal conduct can threaten the integrity of the agency’s dedication to these standards. Affected Individuals are also protected from intimidation or retaliation regarding participation in investigations, reporting retaliation or intimidation, and reporting fraud to authorities. Any threat or act of intimidation or retaliation can deter the reporting of suspected misconduct and can limit ADAPT HV’s ability to discover, monitor and resolve issues of compliance.**

**ADAPT HV's Compliance Program applies to all Affected Individuals. All Affected Individuals are expected to:**

- **Act in accordance with ADAPT HV's Code of Conduct**
- **Refuse to participate in any unethical or illegal conduct.**
- **Report any unethical or illegal activity to the Compliance Officer, Director of Human Resources, or the department head or coordinator who oversees their program.**

**Compliance remains a high priority for ADAPT HV. We want to be the agency that is honest, follows the rules, does the right thing, and provides high quality services to our people supported. Compliance is a strong part of our agency's culture and is set by the tone from the top. This helps us provide a strong foundation for the way we do business and support our service recipients. Our goal is to be the provider of choice, the partner of choice and the employer of choice.**

**ADAPT HV's Compliance Program and Code of Conduct include the following key principles that guide our work:**

- 1. We are committed to creating and maintaining a safe and professional workplace.**
- 2. We provide services of the highest quality.**
- 3. We comply with all government laws, regulations, and agency rules.**
- 4. All information about the agency and people we support is kept confidential and released only when appropriate.**
- 5. We only use ADAPT HV resources and supplies for the benefit of ADAPT HV and the people we support.**
- 6. We do not alter, destroy, or change any agency records in accordance with federal, state and local laws.**
- 7. All billing and program documents are accurate and truthful.**
- 8. We understand our job responsibilities and demonstrate appropriate and respectful behavior.**
- 9. We do not engage in any form of discrimination, harassment, or abuse toward the people we support, our co-workers, or any other person we interact with at ADAPT HV.**

**10. We support and promote a work environment where staff and other Affected Individuals can raise ethical concerns. Any staff member or other Affected Individual who raises concern about wrongdoing is supported.**

**ADAPT HV's Compliance Program contains the following elements:**

**1. Written Policies and Procedures and Standards of Conduct:**

**ADAPT HV has established written Policies and Procedures to help guide Affected Individuals regarding agency processes and the laws and regulations which govern our work. The agency's policies and procedures help convey the agency's mission and values in addition to enabling the execution of its strategy to maintain quality services for the people we support. ADAPT HV's Compliance Policies and Procedures and Code of Conduct provide guidance to Affected Individuals regarding the ethical and legal compliance requirements for their jobs or services provided to the agency.**

**ADAPT HV has established a policy for reviewing and development of policies. ADAPT HV has established a process to review and update agency written policies and procedures through the agency's Policy Review Committee. Agency policies and procedures are reviewed by the Committee on an annual basis to ensure the policies remain current and effective, including the agency's Compliance policies and Code of Conduct.**

**Agency policies and procedures and Code of Conduct are maintained on the agency's Intranet to ensure this information is readily available to all employees including the chief executive, senior administrators, and managers.**

**Compliance policies and procedures are shared with other Affected Individuals who are not employees on an annual basis via email or direct mail including contractors, agents, subcontractors, independent contractors, governing body, and corporate officers.**

**ADAPT HV's Compliance Policies include guidance in the following areas:**

- Articulate the agency's commitment to comply with all applicable federal and state standards, identifying the governing laws and regulations that are applicable to the agency's risk areas.
- Describe the function of the Compliance Program and responsibilities of all Affected Individuals in carrying out the functions of the Compliance Program.
- Assist Affected Individuals in identifying potential compliance issues, questions, and concerns, set forth expectations for reporting compliance issues and explain how to report such issues.
- Establish an expectation that all Affected Individuals will act in accordance with the standards of conduct and that they must report any unethical or illegal activity.
- Identify the methods and procedures for communicating compliance issues to the appropriate Compliance personnel.
- Include a policy of non-intimidation and non-retaliation for good faith participation in the Compliance Program including reporting, participation in investigations, self-evaluations, audits, remedial actions, reporting instances of intimidation or retaliation, and reporting potential issues to State or Federal entities.
- Disciplinary standards setting forth the provider's expectation regarding Affected Individuals who fail to comply with the agency's written policies and procedures, standards of conduct, or State and Federal laws, rules, and regulations.

## **2. Compliance Officer:**

**ADAPT HV has a Compliance Officer who is responsible for coordinating and monitoring compliance activities across the agency and the day-to-day operation of the Compliance Program.**

**The Compliance Officer's duties include:**

- **Overseeing and monitoring the adoption, implementation and maintenance of the Compliance Program and evaluating its effectiveness.**
- **Drafting and implementing a compliance work plan to outline ADAPT HV's strategies for meeting the requirements of 18 NYCRR Part 521.**
- **Reviewing and revising ADAPT HV's Compliance Program, written policies, standards of conduct based on ADAPT HV's organizational experience and**

any changes to Federal and State Laws, rules, regulations, policies, and standards.

- Reporting directly, no less frequently than quarterly, to ADAPT HV's governing body, chief executive, and Compliance Committee on the progress of adopting, implementing, and maintaining the Compliance Program.
- Assisting in establishing methods to improve ADAPT HV's efficiency, quality of services and reducing ADAPT HV's vulnerability to fraud, waste, and abuse.
- Investigating and independently acting on matters related to ADAPT HV's Compliance Program, including coordinating internal investigations including reporting, coordinating, and pursuing any resulting corrective actions.

The Compliance Officer reports directly to the chief executive or other executive staff, while also having access to the chief executive and governing body. ADAPT HV will ensure that the Compliance Officer is allocated sufficient staff and resources to satisfactorily perform their responsibilities for the day-to-day operation of the Compliance Program. ADAPT HV will ensure that the Compliance Officer and appropriate compliance staff have access to all records, documents, facilities and affected individuals that are relevant to carrying out their Compliance Program responsibilities.

### **3. Compliance Committee:**

ADAPT HV's Compliance Committee is responsible for coordinating with the Compliance Officer to ensure the agency is conducting its business in an ethical and responsible manner consistent with its Compliance Program. The agency will outline the duties and responsibilities, membership, designation of a chair, and frequency of meetings in a Compliance Committee Charter.

The Compliance Committee's responsibilities include:

- Coordinating with the Compliance Officer to ensure the agency's written policies and procedures and standards of conduct are current, accurate and complete in addition to ensuring required training is completed timely.

- **Coordinating with the Compliance Officer to ensure communication and cooperation by Affected Individuals on compliance related issues, internal and external audits, investigations, or any other compliance related functions.**
- **Advocating for the allocation of sufficient funding, resources, and staff for the Compliance Officer to fully perform their responsibilities.**
- **Ensuring the agency has effective systems and processes in place to identify compliance program risks, overpayments and other issues and effective policies and procedures for correcting and reporting such issues.**
- **Advocating for adoption and implementation of required modifications to the compliance program.**

**Membership in the committee will be comprised, at a minimum, of senior managers. The committee will meet no less than quarterly and no less frequently than annually to review and update the Compliance Committee Charter.**

#### **4. Training and Education:**

**ADAPT HV has established and implemented an effective compliance training program for its Compliance Officer and all Affected Individuals.**

**The agency's compliance training program includes:**

- **ADAPT HV's risk areas and organizational experience.**
- **ADAPT HV's written compliance related policies and procedures.**
- **The role of the Compliance Officer and Compliance Committee.**
- **How Affected Individuals can ask questions and report potential compliance related issues and concerns to the Compliance Officer and senior management, including the obligation of Affected Individuals to report suspected or illegal or improper conduct, the procedures for submitting such reports, and the protection from intimidation and retaliation for good faith participation in the Compliance Program.**
- **Disciplinary standards with an emphasis on the standards related to ADAPT HV's Compliance Program and the prevention of fraud, waste, and abuse.**
- **How ADAPT HV responds to compliance related issues.**

- Requirements specific to ADAPT HV's category of service, billing requirements and best practices, and the claims submission process.

All Affected Individuals will complete training as part of their orientation with the agency and annually thereafter. Training will be provided in a form and format understandable to all Affected Individuals. ADAPT HV will maintain a training plan which outlines the subjects for training, the timing and frequency of training, which Affected Individuals are required to attend, how attendance is tracked, and how the effectiveness of training is evaluated.

#### 5. Lines of Communication:

ADAPT HV has established effective lines of communication which will ensure the confidentiality of the agency's Affected Individuals. Lines of communication are accessible to all Affected Individuals and allow for questions regarding compliance issues to be asked and for compliance issues to be reported. ADAPT HV publicizes the lines of communication to the Compliance Officer and these lines of communication are available to all Affected Individuals and people supported by the agency. ADAPT HV has a method of anonymous reporting of potential fraud, waste and abuse, and other compliance issues to the Compliance Officer.

ADAPT HV will ensure the confidentiality of concerns of persons reporting compliance issues is maintained unless the matter is subject to a disciplinary proceeding, referred to, or under investigation by MFCU, OMIG, or law enforcement, or disclosure is required during a legal proceeding. Such persons are protected under ADAPT HV's policy for non-intimidation and non-retaliation.

Information is available on ADAPT HV's website concerning its Compliance Program, including contact information for the Compliance Officer and Code of Conduct.

Commitment to Compliance postings are present in all agency programs and office locations. These postings include the contact information listed below:

- Vincent Carlucci, Compliance Officer, at (845) 695-2586 or [vcarlucchi@adapthv.org](mailto:vcarlucchi@adapthv.org)

- ADAPT HV's Confidential Ethics Hotline at (833) 523-2525
- Christine Sutton, Director of Human Resources, at (845) 695-2505, or [csutton@adapthv.org](mailto:csutton@adapthv.org)

## **6. Disciplinary Standards:**

**ADAPT HV has established disciplinary standards and implements the enforcement of such standards to address potential violations and to encourage good faith participation in the compliance program by all Affected Individuals.**

**Disciplinary standards and the procedures for taking such actions are disseminated to all Affected Individuals and are incorporated into the agency's compliance training. ADAPT HV enforces its disciplinary standards fairly and the same level of disciplinary action applies to all levels of personnel.**

## **7. Auditing and Monitoring:**

**ADAPT HV has systems in place for routine monitoring and identification of compliance risks including risks related to billings, payments, ordered services, medical necessity, quality of care, governance, mandatory reporting, credentialing, and contractor/subcontractor/independent contractor oversight.**

**ADAPT HV monitors the results of internal and external audits and uses this information to identify risk areas that need to be updated regarding the Compliance Program or Compliance Work Plan. Audits or investigations conducted by state and governmental entities are not considered external audits for purposes of this compliance program. The design, implementation and results of internal and external audits are shared with the Compliance Committee and governing body.**

**Overpayments identified shall be reported, returned, and explained in accordance with Subpart 521-3: Self-Disclosure requiring that the provider shall report, return, and explain overpayments within 60 days of identification.**

**On an annual basis, ADAPT HV will conduct a review of our Compliance Program to ensure that the agency's Compliance Program is in compliance with the 18 NYCRR Part 521 regulations, to determine the effectiveness of the agency's**

**Compliance Program, and to determine if any revision or corrective action is necessary. The results of this review will be shared with the chief executive, senior management, Compliance Committee, and governing body.**

**ADAPT HV will ensure that the exclusion status of Affected Individuals upon the start of their relationship with the agency and every 30 days thereafter utilizing the NY State Office of the Medicaid Inspector General Exclusion List and the Health and Human Services Office of Inspector General’s List of Excluded Individuals and Entities. Results of exclusion checks will be shared with the Compliance Officer, Compliance Committee, the chief executive, and governing body.**

**ADAPT HV has established and implemented procedures for promptly responding to compliance issues as they are raised. Upon detection of potential compliance risk or compliance risk areas, whether through reports received or as the result of auditing and monitoring, the agency will take prompt action to investigate the conduct in question, determine what, if any corrective action is required, and implement such corrective actions. Investigations will be documented and include any alleged violations, a description of the investigative process, copies of notes and other supporting documentation to ensure that a thorough investigation was conducted. The agency will document any disciplinary action taken and corrective actions implemented as a result of an investigation. In cases where ADAPT HV believes that a State or Federal law, rule or regulation has been violated, the agency will promptly report such violation to the appropriate governmental entity where such reporting is required by law, rule, or regulation.**

**Attached is a summary of the federal and state laws relevant to the Compliance Program. This list has been derived from the website of the NYS Office of the Medicaid Inspector General and is made available for the information and use of all individuals affected by ADAPT HV’s Compliance Program.**

<i>Version number</i>	<i>Summary of changes</i>	<i>Effective date</i>
1.00	New Compliance Program	10.3.2023
2.00	Reviewed	2.5.2024
3.00	Reviewed	2.3.2025
4.00	Reviewed	2.2.2026



## COMPLIANCE AND ETHICS COMMITTEE CHARTER

### Statement of Purpose:

ADAPT of the Hudson Valley and our partner agencies are committed to:

- Fostering a culture of integrity, accountability, and ethical behavior.
- Maintaining ethical and transparent business practices.
- Implementing processes and procedures that prevent, detect, and correct conduct or practices that are illegal or unethical.
- Establishing an environment that encourages employees to report ethical concerns without fear of intimidation or retaliation.
- Identifying and addressing the organization's primary compliance risks.
- Establishing internal controls that promote adherence to laws and regulations.

### Scope:

This charter sets forth the duties and responsibilities and governs the operations of the organization's Compliance and Ethics Committee.

### Roles and Responsibilities:

Coordinating with the Director of Corporate Compliance and Quality Improvement to ensure that the written policies, procedures, and standards of conduct required by 18 NYCRR Part 521-1 are accurate and complete.

Ensuring that annual compliance training is developed and conducted as well as overseeing the annual compliance training plan addressing key compliance risks.

Coordinating with the Director of Corporate Compliance and Quality Improvement to ensure communication and cooperation by affected individuals on compliance related issues, investigations, internal or external audits.

Agency leadership models the appropriate tone at the top and fully supports a culture of compliance, ethical behavior and nonretaliation, including effective communication of such throughout the organization.

Reviewing and approving annually the compliance work plan which includes compliance monitoring and auditing initiatives.

Advocating for sufficient funding, resources, and staff for the Director of Corporate Compliance and Quality Improvement to fully perform their responsibilities.

Ensuring that the organization has effective systems and processes in place to identify compliance program risks, overpayments and other issues and effective policies and procedures for correcting and reporting such issues.

Advocating for adoption and implementation of required modifications to the Compliance Program.



Staying abreast of significant developments relating to the compliance expectations from Federal and State regulatory requirements that apply to all facets of the organization's mission and work.

Ensuring the Compliance Program includes a disclosure program that has effective open communication channels, including a hotline for employees, service recipients and third parties to report in good faith and anonymously if they wish, all compliance and ethical concerns.

Reviewing periodically the findings of compliance auditing and monitoring initiatives and ensuring that management develops and timely implements appropriate corrective actions in response to findings.

Periodically reviewing and revising, as appropriate, this Compliance and Ethics Committee Charter.

#### Members:

To ensure that the Compliance and Ethics Committee has the insight, perspective and full support of the key organizational functions and divisions of the organization, its membership will include:

- Chief Executive Officer – ADAPT HV
- Director of Corporate Compliance and Quality Improvement (Chair) – ADAPT HV
- VP of Program Services – ADAPT HV
- VP of Finance – ADAPT HV
- Director of Information Technology – ADAPT HV
- Director of Human Resources – ADAPT HV
- A Board member – ADAPT HV
- Manager of Compliance and Quality Improvement – Internal Audits – ADAPT HV
- Chief Administrative Officer – ADAPT Community Network
- Chief Operating Officer – ADAPT Community Network
- Chief Compliance Officer – ADAPT Community Network
- Other members as the Committee shall determine from time to time.

#### Leadership:

The Director of Corporate Compliance and Quality Improvement will serve as the chairperson for the Compliance and Ethics Committee. The Director of Corporate Compliance and Quality Improvement may appoint a delegate to chair the meeting at their discretion.

#### Reports To:

CEO and Board of Directors on at least a quarterly basis.

#### Meetings:

The Compliance and Ethics Committee will meet no fewer than four times per year on a quarterly basis. Meetings may be conducted in-person, telephonically, or through video conference using the organizations approved communications channels, devices, or platforms. All Compliance and Ethics Committee Members are expected to attend each meeting and a quorum representing a majority must be present to transact business.

Revised January 12<sup>th</sup> 2026,



by Vincent Carlucci, Director of Corporate Compliance & Quality Improvement

Date of Compliance Committee Approval: 2/2/2026



## 2026 COMPLIANCE TRAINING PLAN

### Goals:

- Review Compliance Training material annually or upon revision to OMIG Compliance program requirements and modify as needed.
- Ensure that all affected individuals, which includes employees, vendors, contractors, sub-contractors, agents, managers, governing body members, volunteers, interns, and corporate officers receive Compliance training/education annually.
- Ensure that all new employees are trained on Compliance program requirements as part of their Pre-Service Orientation, which includes administering a posttest to assess knowledge and retention of information.
- Complete Compliance training with Senior Staff, which includes administering a post test, completing conflict of interest questionnaires, and providing education on how to properly instruct Compliance training to their subordinates or other affected individuals that work in their programs/departments.
- Complete Compliance training with the ADAPT HV Board of Directors, which includes review of the ADAPT HV Compliance Annual report and the completion of conflict-of-interest questionnaires.

### Training:

- **All new Employees:**
  - Compliance training is provided at Pre-Service Orientation to all staff, regardless of department or position. HIPAA training is also included as part of Pre-Service Orientation.
- **Non-Senior Staff / Non – Administration building employees:**
  - Compliance and HIPAA training is provided annually to these employees by their Directors or Coordinators. This training includes a posttest and attendance / participation will be tracked by the Directors and eventually the Learning Management System. Proof this training occurred must be maintained in the Staff Training binders and be available to produce upon request. Internal Audits will evaluate each staff's compliance with the training requirements.
- **Compliance Committee:**
  - Employees who participate in the Compliance Committee receive training as part of Senior Staff and Board Member compliance trainings, which includes conflict of interest questionnaires. In the event the Compliance Committee membership changes to include



someone from outside of ADAPT HV, they will be required to attend a Compliance training session.

- **Senior Staff:**
  - Senior staff Compliance and HIPAA training will tentatively occur in Q2 of 2026. Multiple sessions are held, with options of both in person and virtual sessions available. These training sessions will both educate employees on the Compliance & HIPAA program requirements, as well as provide them resources and guidance on how to deliver this training to their staff and other applicable affected individuals. The Senior Staff session includes conflict of interest questionnaires and a posttest (for both Compliance and HIPAA). Attendance is tracked by the Compliance department.
  
- **Administration Building staff:**
  - Staff who work in the Administration Building will receive training in Q3 2025. Multiple sessions are held, with options of both in person and virtual trainings available. These sessions will cover both Compliance and HIPAA requirements. This training will include the posttest and attendance will be tracked by the Compliance department.
  
- **Staff who missed training:**
  - The Compliance department will offer make-up sessions for any Senior Staff or Administration Building staff who missed training earlier in the year. Post tests and conflict of interest questionnaires will be administered for applicable staff.
  
- **Governing body training:**
  - The ADAPT HV Board of Directors will be trained in either the Q2 or Q3 board meeting. Training will include a review of the 2024 Annual Compliance report and conflict of interest questionnaires.
  
- **Other Affected Individuals:**
  - Affected individuals who work with, for, or in conjunction with ADAPT HV are required to participate in the Compliance Program. Affected individuals such as contractors or interns who regularly work with the people supported or in ADAPT HV programs are trained with non-senior/administration building employees. Other vendors and contractors, will be educated on the Compliance Program requirements, including Abuse Prevention policies via an educational mailing. The mailing includes Compliance hotline information and other education information that both empowers and mandates an affected individual's participation in the Compliance Program. The Director of Compliance oversees the completion of the mailing. The 2026 Vendor Mailing will be completed by the end of Q2.



- The Compliance department will track trainings, including attendance and post-tests for Senior Staff and Administration building staff.
- The Compliance Officer will directly collect and monitor conflict of interest questionnaires completed by Senior Staff and Board members.
  - Any concerns noted on the conflict-of-interest questionnaires will be shared with the CEO, the Compliance committee and or the board (if applicable or necessary)
- Program Directors and Program Coordinators are responsible for record keeping of Compliance post-tests and training for non-senior/administration building staff. These records must be maintained in accordance with agency policy and be available for review upon request or during an internal audit.
- All new employees who are trained during Pre-Service Orientation have copies of their Compliance and HIPAA training maintained by the Compliance Department, Information Technology department and Staff Development.
- The Compliance department maintains attestations and copies of affected individual educational mailings that occur annually.

Training Plan created by  
Vincent Carlucci, Director of Corporate Compliance  
January 19<sup>th</sup>, 2026

Approved by Compliance Committee: 2/2/2026

# Code of Conduct for Custodians of People with Special Needs

## Introduction

The Code of Conduct, as set forth in the Code of Conduct itself, sets forth a framework intended to assist impacted employees to help people with special needs “live self-directed, meaningful lives in their communities, free from abuse and neglect, and protected from harm,” in addition to the specific guidance provided by the agency’s policies and training.

Similarly, the Notice to Mandated Reporters contains guidance designed to assist mandated reporters and is intended to provide a summary of reporting obligations for mandated reporters. It is not intended to supplement or in any way add to the reporting obligations provided by law, rule, or regulation.

As provided by law, rule, or regulation, only custodians who have or will have regular and direct contact with vulnerable persons receiving services or support from facilities or providers covered by the Justice Center Act must sign that they have read and understand the Code of Conduct.

The framework provides:

### 1. Person-Centered Approach

My primary duty is to the people who receive supports and services from this organization. I acknowledge that each person of suitable age must have the opportunity to direct his or her own life, honoring, where consistent with agency policy, their right to assume risk in a safe manner, and recognizing each person’s potential for lifelong learning and growth. I understand that my job will require flexibility, creativity and commitment. Whenever consistent with agency policy, I will work to support the individual’s preferences and interests.

### 2. Physical, Emotional and Personal Well-being

I will promote the physical, emotional and personal well-being of any person who receives services and supports from this organization, including their protection from abuse and neglect and reducing their risk of harm to others and themselves.

### 3. Respect, Dignity and Choice

I will respect the dignity and individuality of any person who receives services and supports from this organization and honor their choices and preferences whenever possible and consistent with agency policy. I will help people receiving supports and services use the opportunities and resources available to all in the community, whenever possible and consistent with agency policy.

### 4. Self-Determination

I will help people receiving supports and services realize their rights and responsibilities, and, as consistent with agency policy, make informed decisions and understand their options related to their physical health and emotional well-being.

## **5. Relationships**

I will help people who receive services and supports from this organization maintain or develop healthy relationships with family and friends. I will support them in making informed choices about safely expressing their sexuality and other preferences, whenever possible and consistent with agency policy.

## **6. Advocacy**

I will advocate for justice, inclusion and community participation with, or on behalf of, any person who receives services and supports from this organization, as consistent with agency policy. I will promote justice, fairness and equality, and respect their human, civil and legal rights.

## **7. Personal Health Information and Confidentiality**

I understand that persons served by my organization have the right to privacy and confidentiality with respect to their personal health information and I will protect this information from unauthorized use or disclosure, except as required or permitted by law, rule, or regulation.

## **8. Non-Discrimination**

I will not discriminate against people receiving services and supports or colleagues based on race, religion, national origin, sex, age, sexual orientation, gender identity, economic condition, disability, or any other protected class under the law.

## **9. Integrity, Responsibility and Professional Competency**

I will reinforce the values of this organization when it does not compromise the well-being of any person who receives services and supports. I will maintain my skills and competency through continued learning, including all training provided by this organization. I will actively seek advice and guidance of others whenever I am uncertain about an appropriate course of action. I will not misrepresent my professional qualifications or affiliations. I will demonstrate model behavior to all, including persons receiving services and supports.

## **10. Reporting Requirement**

As a mandated reporter, I acknowledge my legal obligation under Social Services Law § 491, as may be amended from time to time or superseded, to report all allegations of reportable incidents immediately upon discovery to the Justice Center's Vulnerable Persons' Central Register by calling 1-855-373-2122.

**Code of Conduct<sup>1</sup> Acknowledgement for Custodians of People with Special Needs**

I pledge to prevent abuse, neglect, or harm toward any person with special needs, consistent with agency policy. In addition, to the extent I am required to report abuse, neglect, or harm of any person with special needs by law, rule, or regulation, I agree to abide by the law, rule, or regulation. If I learn of, or witness, any incident of abuse, neglect or harm toward any person with special needs, I will offer immediate assistance, notify emergency personnel, including 9-1-1, and inform the management of this organization, consistent with agency policy.

I acknowledge that I have read and that I understand the Code of Conduct.

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Signature

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Print Name

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Date

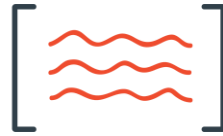
Program: \_\_\_\_\_

Department: \_\_\_\_\_

Facility/Provider Organization: \_\_\_\_\_

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<sup>1</sup>No aspect of this Code of Conduct is in any way intended to interfere, abridge, or infringe upon the rights provided by the Taylor Law.



**ADMINISTRATION**

**A-1 DEVELOPMENT AND APPROVAL  
OF POLICIES & PROCEDURES**

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**Purpose**

ADAPT of the Hudson Valley’s (ADAPT HV’s) policies and procedures help convey the agency’s mission and values in addition to enabling the execution of its strategy to maintain high quality services for the people we support.

**Policy**

ADAPT HV’s approved policies and procedures adhere to and are consistent with all regulations and laws of associated city, state and federal agencies which oversee and fund the agency.

ADAPT HV’s agency-wide policy and procedure manual is available for review by staff, Board Members, and persons supported. The agency welcomes input from our staff, persons supported, Board Members, parents, guardians, correspondents, advocates and other interested people who suggest new policies or revisions to existing ones.

All program administrators are expected to be familiar with the agency’s policies and procedures. Administrators or designees are responsible for the implementation of all approved policies and procedures, and for the training of their subordinate staff. Each staff member is responsible for knowing and executing those policies and procedures which are related to his or her position and program.

ADAPT HV’s policies and procedures are maintained and organized on the Policy and Procedure Manual found on the agency’s Intranet site.

ADAPT HV’s Board of Directors are appraised of significant changes to the Policy Manual.

In addition, an annual review of the manual ensures that agency policies and procedures remain dynamic and current to enable the continued provision of quality services which meet the changing needs of agency and the people we support.

**Implementation**

ADAPT HV’s Policy Review Committee (PRC) is led by the Compliance Officer and is comprised of a cross section of leadership throughout the agency. The PRC is responsible to review the ADAPT HV Policy and Procedure Manual on an ongoing basis and annually, at minimum. The PRC reviews all new policies and procedures in addition to any revisions to existing policies and procedures currently in place. The PRC ensures that all current policies and procedures remain current with all applicable laws, regulations and changes in the method in which agency operations are executed.

ADAPT HV’s policies and procedures will be written in the format/template agreed upon by the PRC to ensure a uniform presentation of the agency’s Policy and Procedure Manual.

ADAPT HV’s PRC’s chairperson is responsible for coordinating and executing all functions associated with the PRC. The PRC generally meets on a monthly basis to review and provide feedback on the policies and procedures submitted for PRC approval.

**Procedure**

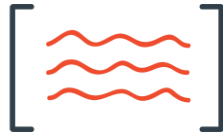
- Written policies and procedures are submitted to PRC chairperson for compiling and organizing prior to the scheduled Policy Review Committee Meeting.

- The author or designee of the submitted policy and procedure presents written policy or procedure at the PRC meeting.
- Policies must be unanimously approved by the PRC. Policies shall be revised as necessary to obtain unanimous approval. The PRC chairperson documents all meeting proceedings and discussions. Meeting minutes are issued to all PRC members and Executive Leadership following each meeting.
- Approved policies and procedures are formatted into the standardized agency policy or procedure format. Approved and formatted policies and procedures are uploaded to agency's Intranet Policy and Procedure Manual by the PRC Chairperson. All Senior Staff receive an email informing them of the newly approved policies and procedures.
- The PRC may suspend or revoke existing policies or procedures by unanimous vote. Any policies and procedures that are suspended or revoked will be documented in the PRC meeting minutes. Senior Staff and Executive leadership will be notified of suspended and revoked policies and procedures by email.

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<i>Version number</i>	<i>Summary of changes</i>	<i>Effective date</i>
1.00	Original	6.27.2022
2.00	Approval by CC	2.2.2026

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#### **APPLICABILITY:**

This policy applies to all ADAPT HV employees, including the Chief Executive Officer, senior administrators, managers, contractors, agents, subcontractors, independent contractors, volunteers, interns, governing bodies, the board of directors and corporate officers.

For purpose of this policy, a contractor or agent is defined as any contractor, subcontractor, agent, or other person which or who, on behalf of the ADAPT of the Hudson Valley (“ADAPT HV”):

- Furnishes, or otherwise authorizes the furnishing of Medicaid health care items or services, performs billing or coding functions; or
- Is involved in the monitoring of health care provided by ADAPT HV.

#### **POLICY:**

It is the policy of ADAPT HV to detect and prevent fraud, waste and abuse in federal healthcare programs. This policy also sets forth the procedures ADAPT HV has put into place to prevent any violations of federal or New York State laws regarding fraud or abuse in its health care programs. (See APPENDIX A OVERVIEW OF RELEVANT LAWS)

ADAPT HV is committed to prompt, complete and accurate billing of all services provided to individuals. ADAPT HV and its employees, contractors and agents shall not make or

submit any false or misleading entries on any claim forms. No employee, contractor or agent shall engage in any arrangement or participate in such arrangement at the direction of another person, including any supervisor or manager, which results in the submission of a false or misleading entry on claims forms or documentation of services which then results in the submission of a false claim.

#### **IMPLEMENTATION:**

1. ADAPT HV will provide training on this policy and procedure to all its employees, contractors, and agents. This training will be provided to all new employees as part of the pre-service orientation.
2. ADAPT HV will perform billing activities in a manner consistent with the regulations and requirements of third-party payers, including Medicaid and Medicare.
3. ADAPT HV will conduct regular auditing and monitoring procedures as part of its efforts to assure compliance with applicable regulations.
4. Any employee, contractor or agent who has any reason to believe that anyone is engaging in false billing practices or false documentation of services is expected to report the practice according to ADAPT HV’s Compliance & Ethical Responsibility Reporting and Investigating.
5. Any form of retaliation against any current or former employee who reports a perceived problem or

concern in good faith is strictly prohibited. In addition, any form of intimidation or retaliation is also strictly prohibited as a result of participation in the investigation of potential compliance issues, self-evaluations, audits, remedial actions, reporting instances of intimidation or retaliation, and reporting potential fraud, waste or abuse to the appropriate State and Federal entities.

6. Any employee who commits or condones any form of retaliation will be subject to discipline up to, and including, termination.
7. The Compliance Officer will ensure that all employees and agents receive training related to the contents of this policy and the False Claims Act. The Compliance Officer will ensure that records are maintained to document the receipt of training.
8. The Compliance Officer will assure that this policy and procedure is attached to any contract with outside contractors or agents (as defined by this policy).

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## **APPENDIX A**

### **FALSE CLAIMS & WHISTLEBLOWER**

This Policy explains the Federal False Claims Act (31 U.S.C. §§ 3729-3733), the Administrative Remedies For False Claims (31 U.S.C Chapter 38 §§3801-3812), the New York State False Claims Act (State Finance Law §§187-194) and other New York State laws concerning false statements or claims and employee protections against retaliation.

#### **OVERVIEW OF RELEVANT LAWS:**

##### **I. The False Claims Act (31 U.S.C. §§ 3729-3733)**

The False claims Act is a federal law designed to prevent and detect fraud, waste and abuse in federal healthcare programs, including Medicaid and Medicare. Under the False Claims Act, anyone who “knowingly” submits false claims to the Government is liable for damages up to three times the amount of the erroneous payment plus mandatory penalties of over \$11,000 for each false claim submitted. This amount is subject to a yearly increase.

The law was revised in 1986 to expand the definition of “knowingly” to include a person who:

- Has actual knowledge of falsity of information in the claim;
- Acts in deliberate ignorance of the truth or falsity of the information in the claim; and
- Acts in reckless disregard of the truth or falsity of the information in a claim.

False Claims suits can be brought against individuals and entities. The False Claims Act does not require proof of a specific intent to defraud the Government. Providers can be prosecuted for a wide variety of conduct that leads to the submission of a false claim.

Some examples include:

- Knowingly making false statements;
- Falsifying records;
- Submitting claims for services never performed or items never furnished;
- Double-billing for items or services;
- Using false records or statements to avoid paying the Government;
- Falsifying time records used to bill Medicaid; or
- Otherwise causing a false claim to be submitted.

#### **Whistleblower or “Qui Tam” Provisions:**

In order to encourage individuals to come forward and report misconduct involving false claims, the False Claims Act contains a “Qui Tam” or whistleblower provision.

The Government, or an individual citizen acting on behalf of the Government, can bring actions under the False Claim Act. An individual citizen, referred to as a whistleblower or “Relator,” who has actual knowledge of allegedly false claims may file a lawsuit on behalf of the U.S. Government. If the lawsuit is successful, and provided certain legal requirements are met, the whistleblower may receive an award ranging from 15% - 30% of the amount recovered.

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**Employee Protections:**

The False claims Act prohibits discrimination by ADAPT HV against any employee for taking lawful actions under the False Claims Act. Any employee who is discharged, demoted, harassed, or otherwise discriminated against because of lawful acts by the employee in False Claims actions is entitled to all relief necessary to make the employee whole. Such relief may include reinstatement, double back pay, and compensation for any special damages, including litigation costs and reasonable attorney fees.

**II. Administrative Remedies for False Claims (31 USC Chapter 38. §§3801-3812).**

This federal statute allows for administrative recoveries by federal agencies including the Department of Health and Human Services, which operates the Medicare and Medicaid programs. The law prohibits the submission of a claim or written statement that the person knows or has reason to know is false, contains false information or omits material information. The ADAPT receiving the claim may impose a monetary penalty of up to \$5,500 per claim and damages of twice the amount of the original claim.

Unlike the False Claims Act, a violation of this law occurs when a false claim is submitted, not when it is paid. Also unlike the False Claims Act, the determination of whether a claim is false, and imposition of fines and penalties is made by an administrative authority, and not by prosecution in the federal court system.

**III. New York State Laws****A. Civil and Administrative Laws****New York State False Claims Act (State Finance Law §§187-194).**

The New York State False Claims Act closely tracks the federal False Claims Act. It imposes fines on individuals and entities that file false or fraudulent claims for payment from any state or local government, including health care programs such as Medicaid. The penalty for filing a false claim is over \$11,000 per claim and the recoverable damages are between two and three times the value of the amount falsely received. This amount is subject to a yearly increase. In addition, the false claim filer may be responsible for the government's legal fees.

The Government, or an individual citizen acting on behalf of the Government (a "Relator"), can bring actions under the New York State False Claims Act. If the suit eventually concludes with payments back to the government, the party who initiated the case can recover 15% - 30% of the proceeds, depending upon whether the government participated in the suit. The New York State False Claims Act prohibits discrimination against an employee for taking lawful actions in furtherance of an action under the Act. Any employee who is discharged, demoted, harassed, or otherwise discriminated against because of lawful acts by the employee in furtherance of an action under the False Claims Act is entitled to relief necessary to make the employee whole.

**Social Service Law §145-b False Statements**

It is a violation to knowingly obtain or attempt to obtain payment of items or services furnished under any Social Services program, including Medicaid, by use of a false statement, deliberate concealment or other fraudulent scheme or device. The State or the

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local Social Services district may recover up to three times the amount of the incorrectly paid claim. In the case of non-monetary false statements, the local Social Service district or State may recover three times the amount incorrectly paid. In addition, the Department of Health may impose a civil penalty of up to \$2,000 per violation. If repeat violations occur within five years, a penalty up to \$7,500 may be imposed if they involve more serious violations of the Medicaid rules, billing for services not rendered, or providing excessive services.

**Social Service Law §145-c Sanctions**

If any person applies for or receives public assistance, including Medicaid, by intentionally making a false or misleading statement, or intending to do so, the person's and the person's family needs are not taken into account for a period of six months to five years, depending upon the number of offenses.

**B. Criminal laws****Social Service Law §145 Penalties**

Any person who submits false statements or deliberately conceals material information in order to receive public assistance, including Medicaid, is guilty of a misdemeanor.

**Social Service Law § 366-b. Penalties for Fraudulent Practices**

Any person who, with intent to defraud, presents for payment any false or fraudulent claim for furnishing services or merchandise, knowingly submits false information for the purpose of obtaining Medicaid compensation greater than that to which he/she is legally entitled to, or knowingly submits false information in order to obtain authorization to provide items or services shall be guilty of a Class A misdemeanor.

Any person who obtains or attempts to obtain, for himself or others, medical assistance by means of a false statement, concealment of material facts, impersonation, or other fraudulent means is guilty of a Class A misdemeanor.

**Penal Law Article 155. Larceny**

The crime of larceny applies to a person who, with intent to deprive another of property, obtains, takes or withholds the property by means of a trick, embezzlement, false pretense, false promise, including a scheme to defraud, or other similar behavior. This law has been applied to Medicaid fraud cases.

**Penal Law Article 175 Written False Statements**

There are four crimes in this Article that relate to filing false information or claims. Actions include falsifying business records, entering false information, omitting material information, altering an ADAPT's business records, or providing a written instrument (including a claim for payment) knowing that it contains false information. Depending upon the action and the intent, a person may be guilty of a Class A misdemeanor or a Class E felony.

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**Penal Law Article 176. Insurance Fraud**

This Article applies to claims for insurance payment, including Medicaid or other health insurance. The six crimes in this Article involve intentionally filing a false insurance claim. Under this article, a person may be guilty of a felony for false claims in excess of \$1,000.

**Penal Law Article 177. Health Care Fraud**

This Article establishes the crime of Health Care Fraud. A person commits such a crime when, with the intent to defraud Medicaid (or other health plans, including non-governmental plans), he/she knowingly provides false information or omits material information for the purpose of requesting payment of a health care item or service and, as a result of the false information or omission, receives such a payment in an amount to which he/she is not entitled. Health Care Fraud is punished with fines and jail time based on the amount of payment inappropriately received due to the commission of the crime.

**New York Labor Law §740**

An employer may not take any retaliatory personnel action against an employee if the employee discloses information about the employer's policies, practices or activities to a regulatory, law enforcement or other similar ADAPT or public official.

This law offers protection to an employee who:

- discloses, or threatens to disclose, to a supervisor or to a public body an activity, policy or practice of the employer that is in violation of law, rule or regulation that presents a substantial and specific danger to the public health or safety, or which constitutes health care fraud (knowingly filing, with intent to defraud, a claim for payment that intentionally has false information or omissions);
- provides information to, or testifies before, any public body conducting an investigation, hearing or inquiry into any such violation of a law, rule or regulation by the employer; or
- objects to, or refuses to participate in any such activity, policy or practice in violation of a law, rule or regulation.

The employee's disclosure is protected under this law only if the employee first brought up the matter with a supervisor and gave the employer a reasonable opportunity to correct the alleged violation. The law allows employees who are the subject of a retaliatory action to bring a suit in state court for reinstatement to the same, or an equivalent position, any lost back wages and benefits and attorney's fees. If the employer is a health care provider and the court finds that the employer's retaliatory action was in bad faith, it may impose a civil penalty of \$10,000 on the employer.

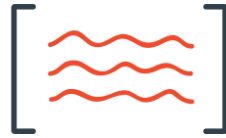
**New York Labor Law §741**

Under this law, a health care employer may not take any retaliatory action against an employee if the employee discloses certain information about the employer's policies, practices or activities to a regulatory, law enforcement or other similar agency or public official. Protected disclosures are those that assert that, in good faith, the employee believes constitute improper quality of patient care.

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The employee’s disclosure is protected under this law only if the employee first brought up the matter with a supervisor and gave the employer a reasonable opportunity to correct the alleged violation, unless the danger is imminent to the public or patient and the employee believes in good faith that reporting to a supervisor would not result in corrective action. If the employer takes a retaliatory action against the employee, the employee may sue in state court for reinstatement to the same, or an equivalent position, any lost back wages and benefits and attorney’s fees. If the employer is a health care provider and the court finds that the employer’s retaliatory action was in bad faith, it may impose a civil penalty of \$10,000 on the employer.

<i>Version number</i>	<i>Summary of changes</i>	<i>Effective date</i>
1.00	Original	6.27.2022
2.00	Revision	5.15.2023
3.00	Revision	4.24.2024
4.00	Approval by CC	2.2.2026



**COMPLIANCE**

**CC-2 INTERNAL AUDITS**

**POLICY:**

Internal auditing is a fundamental component in the governance of an effective compliance program. Internal audits allow for risk-based operational and performance assessment across the organization based on current regulations set forth by State, Federal, associated accrediting organizations and ADAPT of the Hudson Valley (“ADAPT HV”). Through independent and objective audits, the Compliance Department can assess and evaluate the effectiveness of systems, standards, and overall compliance across different program divisions within ADAPT HV.

ADAPT HV’s Internal Audit process is a continuation of the organization’s commitment to ongoing risk mitigation and ensuring effective management practices are in accordance with internal and external governance. This commitment allows the organization to maintain a culture of transparency and integrity. One important aspect of the internal audit process at ADAPT HV is to include the personalized feedback of the persons supported by conducting satisfaction surveys and observations during audits. It is crucial that we consistently assess and observe that persons supported are satisfied with the services

received and have a voice in being part of any change.

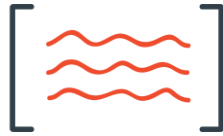
**APPLICABILITY:**

The internal audit established process will review each program’s compliance with related agency, state, federal and other regulatory body’s standards. A rating of “Met” or “Not Met” is attributed to each of the established internal audit protocol standards (see ADAPT HV Internal Audit Tool on agency intranet).

ADAPT HV’s internal audit process also includes the completion on going financial reviews of relevant programs utilization of agency and supported person’s funds. Additionally, specialized agency audits, at the discretion of the Compliance Department with input from the Executive team, are conducted via an internal auditor from the Compliance Department.

A report of completed audits is subsequently issued to the respective program administrators and applicable members of ADAPT HV’s Executive team. Program administrators are mandated to satisfactorily address any agency protocol standard given a “Not Met” rating.

<i>Version number</i>	<i>Summary of changes</i>	<i>Effective date</i>
1.00	Original	4.22.24
2.00	Approved by CC	2.2.2026



**APPLICABILITY:**

This policy is applicable to all agency employees, including the Chief Executive Officer, Senior administrators, managers, contractors, agents, subcontractors, independent contractors, volunteers, interns governing bodies, the board of directors and corporate offices.

**SCOPE AND PURPOSE:**

ADAPT of the Hudson Valley (“ADAPT HV”) considers Incident Reporting, tracking and review a vital agency process for mitigating and preventing future occurrences of incidents. It is the responsibility of all staff to make every effort to prevent incidents from occurring. When an incident does occur, the immediate priorities are to avoid further injury and provide necessary treatment. Following these steps, all incidents are reported, investigated, and reviewed.

ADAPT HV complies with the incident reporting regulations and guidelines of its oversight agencies based on program type, including the NYS Justice Center (The Justice Center), the NYS Office of People with Developmental Disabilities (OPWDD), and the NYS Department of Health (DOH),

**PROCEDURE:**

**IMPLEMENTATION:**

Incident Management process is overseen and supported by the Compliance Department. The department is composed of trained investigators and quality assurance staff who ensures that all activities related to incident management are conducted within the parameters of State Oversight Agency (SOA) and the agency practices. All employees receive training annually and as needed on the tenets of incident reporting per regulatory standards.

**INCIDENT OWNERSHIP:**

When the person supported who was involved in the incident is enrolled in more than one agency program, the program in which the incident occurred is responsible for reporting and managing the incident and submitting it to the Incident Review Committee for review. If another program serving the person supported first learned of the incident, this program is responsible to ensure the person supported safety and immediately contact the program in which it occurred.

All affected programs are responsible to communicate with each other to ensure that classification, reporting, investigation, reviewing, and follow-up occurs. In the event of a question concerning the handling of an incident, the respective Division head resolves the questions. The ADAPT HV

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program at which the incident occurred is responsible to send the documentation to all other ADAPT HV programs that support the person supported.

ADAPT HV strives to achieve communication and mutual responsibility with the programs of other service providers. If the ADAPT HV program is the “program of occurrence”, when investigation and review are complete, the program informs the other agency of its conclusion and any subsequent actions taken. The ADAPT HV Program Director requests from other program adequate documentation to ensure that appropriate classification, reporting, investigation, review, and follow-up occurred. If necessary, the ADAPT HV program investigates and reports the incident internally and externally.

Agency employees, Board members, interns, volunteers, consultants and contractors are informed of the incident reporting policies and procedures with orientation training varying by position. All staff are provided with training regarding ADAPT HV’s Incident Reporting Policy and Abuse & Neglect Prevention annually. ADAPT HV also notifies the persons supported, their parents, guardians, or correspondents by giving them a written overview at the time of admission.

No employee, intern, volunteer, consultant, or contractor may work with persons supported in an unsupervised capacity until they have received incident reporting training.

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**INCIDENT DEFINITION AND CLASSIFICATION**

(Per OPWDD 624 handbook [final-part-624-handbook-updated-with-memo-2\\_16\\_23.pdf \(ny.gov\)](#))

Incidents are situations that cause harm or are likely to cause harm (physical, emotional or other) to persons supported.

Custodian- A party that meets one of the following criteria:

1. A director, operator, employee, or volunteer of an agency; or
2. A consultant or an employee or a volunteer of a corporation, partnership, organization, or governmental entity that provides goods or services to an agency pursuant to contract or other arrangement that permits such party to have regular and substantial contact with persons supported receiving services; or
3. A family care provider; or
4. A family care respite/substitute provider

**Alerts:**

Alerts are the agency’s internal incidents which are reported and reviewed, but do not require investigation with the exception of Injuries of Unknown Origin Requiring Examination or Minor First Aid. Alerts must be reported to the Program Director but are not considered incidents under the auspices of OPWDD. The purpose of reporting Alerts is to ensure that quality care is always maintained. Reporting requires notification to supervisory staff, at an early stage, of situations that may eventually result in the need for intervention or attention. These are

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## CC-3 INCIDENT MANAGEMENT AND ABUSE PREVENTION

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situations that are reported in writing to the Vice President and/or Coordinator of Operations. Asterisked \*categories 5-8 below are reviewed by the Incident Review Committees within 90 days. Alerts include the following:

1. Vehicle accidents
2. Injuries to a person supported which results in the need for examination and/or the provision of minor first aid.
3. Indications of the need to monitor a person supported for health or safety issues (e.g., personal intervention techniques were used without a behavior plan or disruptive behaviors which may lead to a behavior plan)
4. Exposure to significant risk of infectious disease. These situations require notification to the Vice President of Nursing or designee to ensure proper infection control measures are implemented.
5. \* Urgent care center visits
6. \* Hospital emergency room visits
  - a. threats of suicide of persons supported also warrant assessment in the hospital emergency room to ensure the person supported is not a danger to themselves or others.

7. \* Unplanned hospital admissions
8. \* Injuries of unknown origin requiring minor first aid. These situations require investigation to attempt to establish the cause of the injury.

### Minor Notable Occurrences:

These are situations under the auspices of ADAPT HV that are reported in writing to the Division leader or designee and reviewed by the Incident Review Committees within 30 days. Minor Notable Occurrences include the following:

1. Injury – Any harm, hurt, or damage to a person supported caused by an act of that person supported or another resulting in medical or dental treatment from a physician, dentist, physician’s assistant, or nurse practitioner (more than first aid) in which the cause of the injury can be identified.
2. Injury of Unknown Origin - Any harm, hurt, or damage to a person supported caused by an act of that person supported or another resulting in medical or dental treatment from a physician, dentist, physician’s assistant, or nurse practitioner (more than first aid) in which the cause of the injury cannot be readily identified. These situations require investigation to attempt to establish the cause of the injury.
3. Theft or Financial Exploitation – Any suspected theft of a

person's supported personal property (including personal funds or belongings) or financial exploitation involving values of more than \$15.00 and less than or equal to \$100.00 that does not involve a credit, debit, or public benefit card and that is an isolated event.

4. Sensitive Situations of Interest to ADAPT HV Administration – Situations related to persons supported and not described above, which may be of a delicate nature to the agency, are reported to the division administration to ensure awareness of the circumstances. (Examples- injury to a person on agency property that is not supported or employed by the agency, the theft of agency property such as an agency vehicle, or situations which could pose potential harm to person supported or staff such as a gas leak).

Serious Notable Occurrences:

These are situations under the auspices of ADAPT HV that are reported in writing to the Department leader or designee and reviewed by the Incident Review Committees within 30 days. Serious Notable Occurrences include the following:

1. Death – The death of any person supported regardless of the cause of death who is under the auspices of ADAPT HV including persons supported who have been

discharged from services and have died within 30 days of discharge. Deaths under the auspices of ADAPT HV's programs certified by OPWDD also require reporting the death to the Justice Center's Death Hotline.

2. Sensitive Situation of Interest to the New York State Office for People With Developmental Disabilities (OPWDD) – Any situation which, in the judgment of the Compliance Officer or designee needs to be brought to the attention of OPWDD as expeditiously as possible.

- a) Sensitive Situations of Interest to OPWDD include "near miss" situations or situations which increase the potential safety concerns (for example a fire alarm system not being operational). Biohazardous accidents, disruptions of essential services, or other sentinel events will also be reported as a Sensitive Situations of Interest to OPWDD, as will criminal acts committed by persons supported. In situations in which it is unclear if an event is a Sensitive Situation to ADAPT HV or a Sensitive Situation to OPWDD, a conversation will be held with OPWDD's Incident Management Unit staff to decide.

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### Reportable Incidents:

Reportable Incidents: Significant Events are categorized as follows:

1. Conduct Between Persons Supported Receiving Services – Conduct between persons supported which would be considered abuse if committed by a custodian, except sexual activity involving persons supported who are adults capable of consenting to the activity, must be reported when the interaction between the persons supported has been deemed as intentional and results in medical treatment above first aid. This is regardless of whether a person's supported behavior support plan addresses targeted behaviors between persons supported.
2. Seclusion – Placement of a person supported in a room or area in which he or she cannot leave at will or in which the person supported perceives they cannot leave at will.
3. Unauthorized Use of Time Out – Use of a procedure in which a person supported is removed from regular programming and isolated in a room or area for the convenience of a custodian or as a substitute for programming.
4. Medication Error with Adverse Effects – Administration of a medication (prescription or over the counter) which is inconsistent with a prescription order in which a person supported experiences adverse effects or the whose

health or welfare is in jeopardy due to:

- a. The administration of medication in an incorrect dosage, an incorrect specified form, an incorrect route of administration, or which has not been prescribed or ordered.
  - b. Administration of medication to the wrong person
  - c. Failure to administer a prescribed medication as ordered
5. Inappropriate Use of Restraints – Use of restraint when the technique that is used, the amount of force that is used, or the situation in which the restraint is used is inconsistent with a person's plan of service. This includes the use of manual, pharmacological, or mechanical measure or device to immobilize or limit the ability of a person supported to freely move his or her arms, legs or body.
  6. Mistreatment – Conduct on the part of a custodian that is inconsistent with a person's supported plan of services which impairs or creates potential to impair the health, safety and welfare of the person supported receiving services.
  7. Missing Person – The unexpected absence of a person supported that based on a person's history or current conditions exposes the person supported to risk of injury or harm.

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- a) Formal search procedures must be initiated immediately upon discovery of the absence of a person whose absence constitutes a danger to the possible well-being of themselves or others
8. Choking with Known Risk – The partial or complete blockage of the airway by an inhaled or swallowed foreign body, including food that leads to a partial or complete inability to breathe involving a person supported with a known risk of choking and a written directive addressing that risk. Any time a known or possible choking has occurred, staff members present must photograph the food/meal or object that contributed to the potential choking
9. Choking with No Known Risk – Any blockage of the airway of a person supported by an inhaled or swallowed foreign body, including food, that leads to a partial or complete inability to breathe for the person supported in which a prior choking risk has not been established. Any time a known or possible choking has occurred, staff members present must photograph the food/meal or object that contributed to the potential choking
10. Self-Abusive Behavior with Injury – A self-inflicted injury to a person supported that requires medical care beyond first aid.
11. Unauthorized Absence – The unexpected or unauthorized absence of a person after formal search procedures have been initiated.
12. Hospitalization Due to Injury – Any suspected harm, hurt, or damage to a person supported receiving services caused by the act of that person supported or another which results in admission to a hospital for treatment in which the cause of the injury can be identified.
13. Hospitalization Due to an Injury of Unknown Origin - Any suspected harm, hurt, or damage to a person supported receiving services caused by the act of that person supported or another which results in admission to a hospital for treatment in which the cause of the injury cannot be readily identified. These situations require investigation to attempt to establish the cause of the injury.
14. Theft or Financial Exploitation – Any suspected theft of a person's supported personal property (including personal funds or belongings) or financial exploitation involving values of more than \$100.00, theft of a person's supported credit, debit, or public benefit card (regardless of the amount involved); or a pattern of theft or financial exploitation involving the property of one or more persons supported receiving services.
15. Other Significant Incident – An incident which occurs under the auspices of an agency but does not involve conduct on the part of a custodian, and because of its severity or sensitivity of the situation may result in or has the
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potential to result in harm to the health, safety, or welfare of a person receiving services.

Reportable Incidents: Abuse and Neglect are categorized as follows:

Abuse – The maltreatment or mishandling of a person supported that would endanger his or her physical or emotional well-being through the action or inaction on the part of an employee, volunteer, consultant, contractor, visitor, or other persons, whether or not the person supported appears to be injured or harmed. The failure to intervene on behalf of a person supported also constitutes abuse. Abuse is categorized as follows:

1. Physical Abuse – Any physical contact by a custodian intentionally or recklessly causing physical injury or a serious physical, mental, or emotional condition of the person supported receiving services.
  - a. Such conduct includes, but is not limited to slapping, hitting, kicking, biting, choking, smothering, shoving, dragging, throwing, punching, shaking, burning, cutting or use of corporal punishment toward a person supported receiving services. Physical contact which is not necessary for the safety of a person supported and causes discomfort to him or her may be considered to be physical abuse, as may the handling of a person with

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more force than is necessary.

- b. Reports of alleged physical abuse will be reported to the police department.

2. Sexual Abuse – Any sexual contact between persons supported receiving services and a custodian whether or not the sexual contact would constitute a crime. A person with a disability who is or was receiving services and is also an employee or volunteer shall not be considered a custodian if the person has contact with another person supported receiving services who is a consenting adult who has consented to sexual contact.
  - a. Conduct by a custodian that subjects a person supported to incest, rape, prostitution or encourages a person supported to engage in prostitution or sexual performance by a child is also considered sexual abuse. (Section 255.25, 25.26, 255.27, 230, and 263 of the penal law)
  - b. Reports of alleged sexual abuse will be reported to the police department.
  - c. All physical evidence must be preserved upon an allegation of sexual abuse and provided to law enforcement where applicable. This includes but is not limited to: the unwashed linens, clothing or personal items present at

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- the time of the alleged abuse. The victim should be discouraged from bathing, showering or changing clothes until a medical examination has been conducted.
3. Psychological Abuse – Verbal or nonverbal conduct that may cause significant emotional distress to a person supported receiving services.
- a. This includes, but is not limited to, taunts, derogatory comments or ridicule, intimidation, threats, or the display of a weapon or other object that could be perceived by a person supported as a means for infliction of pain or injury in a manner which constitutes a threat of physical pain or injury.
  - b. Substantiation of psychological abuse after it is reported will include clinical assessment by physician, psychologist, psychiatric nurse practitioner, licensed clinical or mater social worker or licensed mental health counselor to establish that the conduct intentionally or recklessly caused or likely caused a substantial diminution of the emotional, social or behavioral condition of the person supported.
4. Deliberate Inappropriate Use of Restraints – Use of a restraint
- when the technique that is used, the amount of force that is used, or the situation in which the restraint is used is deliberately inconsistent with a person’s supported plan of services, behavior support plan or generally accepted treatment practices, except when the restraint is used for an emergency intervention to prevent risk of harm to a person supported or other party.
- a. Restraint includes the use of any manual, pharmacological, or mechanical measure or device to immobilize or limit the ability of a person receiving services to freely move their arms, legs or body.
5. Use of Aversive Conditioning - Application of physical stimulus that is intended to induce discomfort or pain in order to modify or change the behavior of a person supported.
6. Obstruction of Reports of Reportable Incidents – Conduct by a custodian that impedes the discovery, reporting or investigation of the treatment of a person supported by
- a. Falsification of records
  - b. Actively persuading a custodian or other mandated reporter from making a report of a reportable incident to the Justice Center Statewide Vulnerable Persons’ Central
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Register (VCPR) or OPWDD	persons supported that would constitute abuse if committed by a custodian.
c. Intentionally making a false statement or intentionally withholding information during an investigation into a reportable incident	b. Failure to provide adequate food, clothing, shelter, or medical, dental, optometric or surgical care provided that necessary consents have been obtained from the appropriate parties.
d. Intentional failure of a supervisor to act upon a report of a reportable incident, or	c. Failure to provide access to educational instruction by a custodian with a duty to ensure such instruction in accordance with the person's supported Individualized Education Program.
e. The failure of a custodian to report a reportable incident upon discovery.	
7. Unlawful Use or Administration of a Controlled Substance – Any administration of a controlled substance by a custodian to a person supported without a prescription or other medication not approved for use by the federal Food and Drug Administration.	
a. This includes the unlawful use or distribution of a controlled substance at the workplace by a custodian while on duty.	
8. Neglect – Any action, inaction, or lack of attention that breaches a custodian's duty that results in or is likely to result in physical injury or serious or protracted impairment of the physical, mental, or emotional condition of a person supported. Neglect includes, but is not limited to:	
a. Failure to provide proper supervision, including lack of proper supervision that results in conduct between	

### REPORTING:

All agency employees, interns, volunteers, consultants, contractors and family care providers are required to report any event or situation which meets the criteria of a reportable incident or notable occurrence.

All staff are trained on the incident reporting policy, code of conduct and abuse prevention as part of New Staff Orientation and annually thereafter. Documentation of annual trainings on incident reporting, code of conduct and abuse prevention are maintained by the Director.

All ADAPT HV staff are required to review and sign the NYS Justice Center Code of Conduct as part of New Staff Orientation and annually thereafter which outlines mandated

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reporter responsibility to the NYS Justice Center for OPWDD certified programs. Custodians (employees, volunteers, Directors and operators of OPWDD covered facilities and programs, and external staff who have regular contact with persons supported) and Human Service Professionals are Mandated Reporters and are required to immediately report allegations of abuse involving custodians in OPWDD certified programs to the Vulnerable Persons Central Registry (VCPR) of the NYS Justice Center unless the person knows that the report has already been made by another employee or that he or she has been named in the report as a person with knowledge of the incident. Staff and clinicians who witness abuse for person supported who are under 18 years of age are required to report the abuse to the Statewide Central Register of Child Abuse and Maltreatment.

All alerts, incidents and allegations of abuse are reported verbally and on a standardized form to prevent their reoccurrence, to inform relevant staff, to take corrective measures and to determine if further investigation, corrective, preventative and/or disciplinary action is necessary. Alerts and incidents may be reported by staff, persons supported, parents or other interested persons. Failure of a staff member, consultant, or contractor to report an alert or incident is considered grounds for disciplinary action and possible termination of employment. For incidents occurring in OPWDD certified programs, management staff or a designee approved by Operations staff will complete the required OPWDD 147 incident reporting form for all Notable

Occurrences and Reportable Incidents.

Incident reports include a description of the occurrence, why it happened, what action was taken and steps necessary to prevent a future occurrence. Staff directly involved in the situation report what happened. Clinical and/or professional staff explains why it happened and administrative staff describes actions to be taken to prevent its reoccurrence.

Certain alerts, all notable occurrences and all reportable incidents including allegations of abuse must be submitted to the Incident Review Committee. Certain situations may have to be reported to persons or agencies external to ADAPT HV. Depending on the nature and severity of an incident and the certification/licensure of the program, it may have to be reported to one or more governmental agencies including the police department and/or District Attorney's Office. Allegations of physical or sexual abuse are reported to the police department. Vendor transportation incidents must be immediately reported to the ADAPT HV Fleet Specialist. All ADAPT HV Programs follow the OPWDD standards for incident reporting and complete appropriate notifications based on their program type and certification.

Incidents for persons supported by ADAPT HV in OPWDD certified programs which do not occur under the auspices of ADAPT HV are reported on the OPWDD 150 incident reporting form.

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All reports are kept in a confidential file in the program in which they occurred.

All notable occurrences and reportable incidents involving persons supported in OPWDD certified programs are entered into OPWDD's Incident Review and Management Application (IRMA) database as required by OPWDD and the NYS Justice Center.

### INVESTIGATION:

All Reportable Incidents and Notable Occurrences as well as Alerts for Injuries of Unknown Origin must be investigated to examine the circumstances surrounding the event, collect information, to evaluate and establish the facts. All investigations will be conducted by a certified investigator who has completed investigator certification training with OPWDD or a certification entity recognized by OPWDD. The Compliance Officer or designee will delegate investigation assignments. Program Directors are permitted to investigate Minor Notable Occurrences, Out of Auspice incidents and Alerts in the program they supervise. No party in the line of supervision of staff who are directly involved in a Serious Notable Occurrence, Reportable Incident or allegation of Abuse may conduct the investigation of such an incident, except for the CEO. Failure of a staff member, consultant, or contractor to cooperate with an investigation is grounds for disciplinary action. Failure of a staff member, consultant, or contractor to report or cooperate in the investigation of an allegation of abuse, or falsification of any information regarding an allegation of abuse in

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OPWDD certified programs will be reported to the NYS Justice Center as obstruction. No person may conduct an investigation of any incident in which he or she was directly involved or in which his or her testimony is incorporated or in which his or her spouse, domestic partner or other immediate family member was directly involved.

All reportable incidents, including allegations of abuse and neglect will be investigated. NYS Justice Center and OPWDD's Incident Management Unit will delegate investigation responsibility for allegations of abuse occurring involving custodians in OPWDD certified programs for investigation to the NYS Justice Center, OPWDD's Incident Management Unit, or to ADAPT HV. Investigations delegated to and conducted by ADAPT HV will be conducted and completed within 30 days of delegation to the agency and the investigation will be shared with the NYS Justice Center and OPWDD for review as required. Investigators will target 5 working days for the completion of investigations, with notification occurring to the Senior Vice President of the division in any cases where an investigation is not completed within 5 working days.

The Investigator will examine and collect all relevant evidence in addition to speaking to all witnesses. The Investigator will complete a report in the format specified by O.P.W.D.D. which establishes the facts and draws conclusions based upon the facts gathered. The Investigator will determine what corrective actions or other interventions are needed based upon the scope and severity of the

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situation in addition to the facts and conclusions drawn from the investigation. The Director of the program in which the incident occurred will be responsible for implementation of all corrective measures recommended by the Investigator.

Employees are required to cooperate with investigations being conducted. If an employee leaves employment prior to the conclusion of a pending investigation, the investigation shall continue until it is completed and (for abuse and neglect allegations) a finding is made of substantiated or unsubstantiated.

## REVIEWS

All Notable Occurrences and Reportable Incidents are reviewed by the Division leader or designee and are reviewed by the Incident Review Committee (IRC). These reviews are to assure that all necessary corrective action was taken in the person supported situation and to prevent its recurrence or the occurrence of similar situations.

No committee member may participate in the review of any Notable Occurrence or Reportable Incident including alleged abuse in which he or she was directly involved, the committee member's family, spouse or domestic partner was involved, or which the committee member participated in the investigation. In addition, no committee member may participate in

a review of a Reportable Incident including allegations of abuse if the committee member is the immediate supervisor of staff directly involved in the incident. Such members may however, participate in the committee's deliberation regarding appropriate corrective or preventative action.

All alerts are reviewed by the Program Director. Those alerts involving urgent care center visits, emergency room service, unplanned hospital admission, injuries of unknown origin requiring minor first aid, or exposure to risk of infectious disease are also reviewed by the Department head/Designee and the IRC. Any situations involving exposure to significant risk of infectious disease are also reported to the Operations Staff's Registered Nurse and reviewed by the Infection Control Committee.

The IRCs are divisional committees. The Incident Review Committees meet at least every 90 days and within 30 days of all serious reportable incidents and notable occurrences. The IRC includes at least two professional staff and other staff who is representative of all the programs within the division and all key staff positions within the division including direct care staff, a person supported, and a member of an advocacy organization. A member of the Board of Directors is also invited to serve on the Incident Review Committee. A physician, physician's assistant, or nurse practitioner is available to the committee for consultation as needed.

Meeting minutes are written for each Incident Review Committee Meeting which includes causes, corrective

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actions taken for improvement and to prevent recurrence, and disciplinary action taken. IRC meeting minutes are reviewed by the CEO or designee. IRC Meeting Minutes are maintained by the Director in a secure location with limited access.

An incident database is also maintained by the Compliance Officer or designee. The incident reports in the database are viewable by the Director of the location where the incident took place, corresponding Operations Staff, the C.E.O. and VP of Program Services. Documentation for all alerts, reportable incidents, and serious reportable incidents is maintained by the Director in a secure location in the program with limited access.

Annually, the Compliance Officer prepares a report describing the functioning of the Incident Review Committee and general trends in incidents and reportable alerts. This report is sent to the C.E.O., Chief, Vice President of Program Services, Division leaders, the Board of Directors, and the appropriate oversight agencies. The Compliance Officer also reviews the incident trend report with an incident review sub-committee of the Board of Directors on at least an annual basis.

### Access to Records Law for OPWDD Certified Programs:

It is the policy of ADAPT HV to comply with all laws, rules and regulations governing the way in which certain notifications are made and how information is shared about incidents and all allegations of abuse in mental

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hygiene facilities certified by OPWDD. This policy has been adopted to comply with the New York Mental Hygiene laws and OPWDD's regulations addressing Part 624 incident notification and reporting requirements. For all categories of notable occurrences and reportable incidents falling under the Access to Records Law, the person supported Qualified Person or Correspondent is offered a follow-up meeting to discuss the incident, offered a copy of the incident report upon written request, and is provided with a report on actions taken by the agency.

### Person Responsible

Staff present at incident

### Procedure

1. Take immediate action to provide the necessary care and safeguards and calls for additional help as needed.
2. For allegations of abuse involving custodians in certified facilities, immediately report incident to the Vulnerable Persons Central Registry (VPCR)
3. Verbally report alert or incident to appropriate staff (immediate supervisor and/or nurse.)
4. Documents alert or incident on ADAPT HV forms.
5. Forwards documents to supervisor and/or pertinent staff (nurse, teacher, director, etc.)

### Person Responsible

Nurse, Supervisory Staff and/or Social Worker

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### Procedure

6. Evaluates situation, documents situation, and provides care and assistance as necessary
7. Notifies program director immediately of all reportable and serious reportable incidents.
8. Completes appropriate section of ADAPT HV form and forwards it to program director.
9. At Director's guidance, notifies parent/guardian/complementary programs of situation and action taken.

### Person Responsible

Program Director/Coordinator

### Procedure

10. Assures that all procedures are followed, all necessary actions taken, and all unsafe conditions are corrected.
11. Completes and reviews alerts/incidents to confirm that they are properly classified (i.e. reportable alert, reportable incident, notable occurrence).
12. Ensures notification of parent/guardian, care manager, complementary program that the participant may attend. If incident occurred at other program, provides information and cooperation to director of program at which incident occurred.

### Person Responsible

Program Director

### Procedure

13. Files alerts except those involving emergency room visits, unplanned hospital admissions, significant risk

of infectious disease, or injuries of unknown origin requiring minor first aid in alert binder.

14. Immediately notifies Division leader or designee of all urgent care or emergency room visits, hospital admissions, infectious diseases contracted, notable occurrences, and reportable incidents.
15. Conducts investigations pertaining to Alerts and Minor Notable Occurrences or facilitates investigations of Serious Notable Occurrences or Reportable Incidents conducted by an investigator who is not in the chain of supervision of the program.
16. Consults with VP of Program Services or designee and may suspend, reassign, or remove a staff person pending outcome of investigation.
17. Upon completion of appropriate sections, forwards to Coordinator of Operations original copies of alerts involving urgent care center visits, emergency room visits, unplanned hospital admissions, significant risk of infectious disease, and injuries of unknown origin requiring minor first aid within 48 hours.
18. Files copy of above reports in alert/incident binder.
19. Prior to end of workday in which incident occurred and as soon as possible, ensures phone report of reportable incidents/allegations of abuse/sudden or suspicious deaths to the following agencies as applicable:
  - a. NYS Justice Center Vulnerable Persons' Central Register (VPC R) for reportable incidents in

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- OPWDD Certified Facilities  
1-855-373-2122
  - b. NYS Justice Center Death Reporting Hotline 1-855-373-2124 for persons supported by OPWDD
  - c. Office of Health Service Management (OHSM) if death is related to events occurring in clinic.
  - d. Police to report crimes
  - e. OPWDD Incident Management Unit for incidents involving OPWDD persons supported
20. Ensures the completion and submission of the following forms:
- a) Reportable Incident
    - a. OPWDD 147 – if program is OPWDD certified entry of 147 into IRMA by the end of the following business day.
  - b) Allegations of Abuse & Deaths
    - a. OPWDD 147 if program is OPWDD certified to.  
Entry of 147 into IRMA by the end of the following business day.
    - b. If abused person supported resides in OPWDD-certified Facility, send 147 to Mental Hygiene Legal Services
  - c) All Deaths:
    - a. For OPWDD – certified program FORM 147 within 24 hours of discovery.
    - b. OPWDD Form 162 Report of Death Form: entered into IRMA database within 5 working days of discovery of death.
    - c. Mental Hygiene Legal Services
21. Documents all of the above along with results of investigation
22. For OPWDD-certified programs, reports monthly to OPWDD via IRMA concerning ongoing investigations of serious reportable incidents or allegations of abuse.
23. Takes action recommended by reviewers and files reports in alert/incident book.
24. Notifies any internal or external program that participant attends of alert / incident and forwards pertinent documentation to them upon completion and review of investigation.
25. If incident/suspected abuse occurred at an external program
- a. Requests information on reporting, investigation, review and follow-up from the agency in which it occurred and documents in files.
  - b. Reviews information and determines if it was properly investigated and reported.
  - c. If there are questions about that agency's handling of incident, consults with Vice President of Program Services and if necessary to the extent possible and reports it to OPWDD.
26. If person involved in incident/suspected abuse is enrolled in more than one ADAPT HV program:
- a. Director of program at which incident is reported (but did not occur) is responsible for contacting director of program at which it occurred, interview of participant and involved staff at program, calling OPWDD or Justice Center (if relevant), and calling supervisor.
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- b. Director of program at which incident occurred (but not reported) is responsible for managing the incident.

### **Person Responsible**

Compliance Officer or Designee

### **Procedure**

- 27. Reviews all Reportable Alerts, Notable Occurrences, and Reportable Incidents.
- 28. Ensures that all forms and reports are completed and sent to the appropriate agencies within the specified time limits.
- 29. Ensures monthly reports of ongoing investigations in OPWDD certified programs are sent to the OPWDD Incident Management Unit via OPWDD's IRMA database.
- 30. Ensures updating of OPWDD's IRMA database for all notable occurrences and reportable incidents.
- 31. Ensures reportable incidents in OPWDD programs are uploaded to the VCPR
- 32. Ensures that Investigation Report Transmission Forms are completed and sent to OHSM within 45 days.
- 33. Implements recommendations and returns the original alerts and incident reports to program director.
- 34. Annually prepares an incident trend report describing Incident Review Committee (IRC) functioning, general trends in incidents, corrective and disciplinary actions taken, and submits it to the CEO.
- 35. Resolves questions between programs concerning handling of an incident.

## CC-3 INCIDENT MANAGEMENT AND ABUSE PREVENTION

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- 36. Attends Incident Review Committee meetings.
  - 37. Provides copies of the Incident Management and Abuse Prevention policy to all person's served and their families annually as part of the annual incident mailing.

### **Person Responsible**

Chairperson, Incident Review Committee

### **Procedure**

- 38. Convenes meetings at least quarterly and within 30 days of a reportable incident including allegations of abuse.
- 39. With IRC members, review all reportable alerts, notable occurrences, and reportable incidents.
- 40. Takes minutes including the participant's name, a summary of the incident, actions taken and recommendations.
- 41. Assures that minutes are kept confidential and are distributed to committee members, Program Director, VP of Program Services, and C.E.O.

### **Person Responsible**

VP of Program Services

### **Procedure**

- 42. Based upon recommendations and questions of IRC, recommends corrective actions to program director.
- 43. Ensures all new admissions receive a copy of the ADAPT HV Incident Management & Abuse Prevention policy as part of their welcome packet.

**Person Responsible**

Program Director

**Procedure**

44. Implements recommended corrective action, reads minutes, responds to questions and recommendations of IRC for serious reportable incidents and allegations of abuse. The opportunity to review the outcome of the investigation is offered to the person supported.

<i>Version number</i>	<i>Summary of changes</i>	<i>Effective date</i>
1.00	Original	9.1.2022
2.00	Revision	5.15.2023
3.00	Revision	6.26.2023
4.00	Revision	4.22.2025
5.00	Revision	8.18.2025
6.00	Approved by CC	2.2.2026

**Person Responsible**

Incident Review Committee

**Procedure**

45. Reviews follow-up information from Program Directors and asks further questions or closes the review.

**Person Responsible**

C.E.O. or designee

**Procedure**

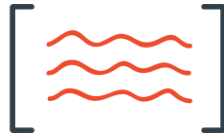
46. Reviews IRC Minutes and corrective actions. Approves annual incident trend report and authorizes its distribution to Program Directors, and the Board of Directors.

**Person Responsible**

Board of Directors

**Procedure**

47. Reviews Annual Incident Trend Report and provides feedback to administration as appropriate.



**CC-4 COMPLIANCE & ETHICAL  
RESPONSIBILITY: REPORTING &  
INVESTIGATING**

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**APPLICABILITY:**

This policy applies to all employees, including the Chief Executive Officer, senior administrators, managers, contractors, agents, subcontractors, independent contractors, vendors, interns, volunteers, governing bodies, the board of directors and corporate offices.

**POLICY:**

ADAPT of the Hudson Valley (“ADAPT HV”) recognizes that a critical aspect of its ethical standards involves fostering a culture that promotes responsible, honest conduct, as well as faithful compliance with the laws and regulations of governmental agencies that find our work and related legal requirements. In order to achieve these important goals, ADAPT HV will implement prevention strategies to curtail improper or illegal activities. ADAPT HV will also devise mechanisms to detect any violations and implement procedures to address any issues that arise.

The agency will take prompt action to resolve instances of conduct that do not conform to Federal, state, and private payer healthcare program requirements, general legal standards and ADAPT HV’s internal ethical standards and business policies.

**IMPLEMENTATION:**

**REPORTING INCIDENTS AND CONCERNS**

To promote a strong ethical culture, ADAPT HV has adopted practices to encourage employees to report any instances of improper or illegal conduct, and the agency has implemented protocols for investigating and resolving these allegations.

All employees, including Executive Staff and Board Members, must report actual or suspected misconduct which the individual, in good faith, believes is occurring. This includes actual or potential violations of laws, regulations, policies, procedures, or ADAPT HV’s standards/code of conduct. Violations of this nature are required to be reported to the Compliance Officer.

Failure to report is also deemed misconduct and a violation of this requirement which may lead to disciplinary action, up to and including termination.

ADAPT HV’s Compliance Officer is responsible to oversee and coordinate this important obligation. In addition, an “open door policy” will be maintained at all levels of management to encourage employees to report problems and concerns related to violations of the standards of honest and ethical conduct required by ADAPT HV.

Employees additionally may report violations or concerns to the Human Resources Department. If an employee believes that their problem or concern has not been resolved, the employee may take the report directly to the Compliance Officer or another Senior Administrator.

Persons associated with the agency are also strongly encouraged to report any actual or suspected misconduct to the Compliance Officer. Engaging in misconduct or failure to report misconduct may result in a termination of their relationship with the agency and disclosure to the appropriate authorities.

## COMPLIANCE

## CC-4 COMPLIANCE & ETHICAL RESPONSIBILITY: REPORTING & INVESTIGATING

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### FREEDOM FROM INTIMIDATION AND RETALIATION

The agency is committed to protecting from intimidation and retaliation, its employees and others who in good faith report problems and concerns. The agency recognizes that a threat or act of intimidation or retaliation against an employee or other individual who has reported improper or illegal conduct can threaten the integrity of the agency's dedication to these standards by deterring the reporting of suspected misconduct and can limit ADAPT HV's ability to monitor and resolve issues of compliance.

Any form of intimidation or retaliation against an employee who reports a perceived problem or concern in good faith is prohibited. This includes, but is not limited to, reporting potential compliance issues to appropriate personnel; participating in investigation of potential compliance issues; self-evaluations; audits; remedial actions; reporting instances of intimidation or retaliation; and reporting potential fraud, waste or abuse to appropriate State or Federal entities. The reporter cannot be subject to any adverse treatment, intimidation or retaliation as long as the report was made in good faith, regardless of the outcome of any subsequent investigation. An employee who commits, orders or condones any form of intimidation or retaliation, or attempts to deter reporting, will be subject to discipline up to and including termination.

### SELF-REPORTING

Employees who take responsibility and report their own misconduct regarding improper or illegal conduct can rely on the fact that ADAPT HV will take the self-reporting into account in determining the appropriate course of action, even though an employee who self-reports will remain subject to appropriate discipline.

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### ANONYMOUS REPORTING

No attempt will be made to identify an individual who requests anonymity. The identity of known reporters will be held in confidence to the extent feasible and as long as it is consistent with applicable laws. The Compliance Officer will communicate the matter deemed potentially unlawful to the CEO or designee of ADAPT HV and appropriate law enforcement officials.

### INVESTIGATION

Any agency-led investigation will be initiated and coordinated through the Compliance or Human Resources department. Only designated representatives from these departments are authorized to request, access and retrieve information from other departments for investigative purposes. Employees are not permitted to independently investigate, gather evidence or request information related to potential violations or misconduct. Unauthorized attempts to do so may be considered a breach of policy and could result in disciplinary action.

Reports of Compliance violations will be investigated by the Compliance Officer, Human Resources or their designee. Subjects of Compliance investigations will be placed on administrative leave as warranted based upon the violation being investigated. The results of these investigations will be reviewed by the Compliance Committee and shared with the CEO and Board of Directors. The Compliance Committee will monitor the status of any corrective actions made by the Investigator and formulate additional corrective actions as needed. The Compliance Committee will monitor the effectiveness of implemented plans of corrective action.

All employees are required to fully cooperate with investigations into Compliance violations. Failure to do so may result in disciplinary action up to and including termination.

## COMPLIANCE

## CC-4 COMPLIANCE & ETHICAL RESPONSIBILITY: REPORTING & INVESTIGATING

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### SELF DISCLOSURE

ADAPT HV will adhere to the guidelines of its funding sources and governmental agencies. The Compliance Officer with feedback from the Compliance Committee will ensure disclosure to the appropriate funding sources and governmental agencies, including the NYS Department of Health and/or the NYS Office of the Medicaid Inspector General as appropriate. (See ADAPT HV's Compliance: Self Reporting & Self Disclosure Policy).

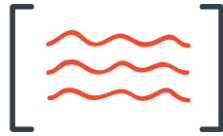
enforcement officials when deemed appropriate.

<i>Version number</i>	<i>Summary of changes</i>	<i>Effective date</i>
1.00	Original	6.27.2022
2.00	Revision	5.15.2023
3.00	Revision	2.24.2025
4.00	Revision	4.22.2025
5.00	Approved by CC	2.2.2026

### DUTIES OF THE COMPLIANCE OFFICER AND THIS POLICY

The Compliance Officer's general responsibilities in relationship to this policy include ensuring that all reports are addressed in an appropriate and timely manner and that all reports are handled in accordance with these and all related policies and procedures. Other responsibilities include the following:

- a. Ensuring proper handling of reports of violations or misconduct
- b. Establishing reporting and records maintenance procedures;
- c. Conducting appropriate investigations and follow-up;
- d. Referring matters when appropriate;
- e. Providing feedback to those who report as feasible and appropriate;
- f. Reporting incidents to the Board of Directors;
- g. Maintaining security for the process and reports;
- h. Investigating any reported retaliation against an employee who reports suspected misconduct; and
- i. Reporting the results of an investigation into suspected intimidation or retaliation to the appropriate committee.
- j. Ensuring Self-Disclosure to governmental agencies and/or law



#### **APPLICABILITY:**

This policy applies to all ADAPT of the Hudson Valley (“ADAPT HV”) employees, including the Chief Executive Officer, senior administrators, managers, contractors, agents, subcontractors, contractors, independent vendors, volunteers, interns, governing bodies, the board of directors and corporate offices.

#### **POLICY ON ETHICAL STANDARDS:**

The Board Members, Officers, the CEO, Executive and Senior Management Staff are responsible for upholding the public trust.

Each person is called to a high standard of stewardship in order to meet the special privileges that ADAPT HV’s tax-exempt status allows. Everyone’s actions shall aim to meet or exceed these higher standards, rather than only minimally satisfying the requirements for tax-exempt status.

Areas of behavior to be avoided include: personal conflicts of interest, questionable investments, inappropriate treatment of individuals supported, improper use of funds raised (especially for personal gain), expensive and inefficient fundraising practices, dishonest or misleading marketing practices and failure to meet legal requirements and similar offenses.

#### **IMPLEMENTATION**

##### **POTENTIAL CONFLICTS OF INTEREST**

The Board of Directors of ADAPT HV has adopted and designed this policy to avoid any possible conflict between their personal interests and the interests of ADAPT HV.

The purpose of this policy is to ensure that decisions about ADAPT HV’s operations and the use and disposition of ADAPT HV’s assets are made solely in terms that bring benefit to ADAPT HV and are not influenced by any private profit or other personal benefit to the individuals affiliated with ADAPT HV who take part in the decision.

In addition to actual conflicts of interest, Board Members and Officers, the CEO, and the Executive and Senior Management Staff are obliged to avoid actions that could be perceived or interpreted as being in conflict with ADAPT HV’s best interest.

Conflicts of interest may occur when ADAPT HV enters into transactions with not-for-profit organizations as well as those that are undertaken with profit making entities. For employees, conflicts of interest may occur when the employee becomes a private staff of a person supported by ADAPT HV in his/her home.

For contractors, conflicts of interest may occur when the contractor directs a person supported by ADAPT HV to use the contractor’s own agency rather than ADAPT HV’s services.

The best way to deal with these problems is a full disclosure of all personal and business

relationships with organizations that do business with ADAPT HV and to refrain from participation in decisions affecting transactions between ADAPT HV and those organizations. Such relationships do not necessarily restrict transactions as long as the relationship is clearly divulged. Any actual or potential conflicts of interest must be shared with the Compliance Officer.

**BOARD OF DIRECTORS: DISCLOSURES**

Each ADAPT HV Board Member and Officer will annually complete a questionnaire regarding possible conflicts of interest. The purpose of the questionnaire is to ensure that areas of potential conflict are known and acknowledged proactively.

Any Board Member who may be involved in any ADAPT HV business transaction in which there is a possible conflict of interest will promptly notify the President of the Board. The Board Member will refrain from voting on any such transaction, participating in deliberations concerning it, and/or using personal influence in any way in the matter. The Board Member's presence may not be counted in determining the quorum for any vote with respect to the ADAPT HV business transaction in which he or she has a possible conflict of interest. Furthermore, the Board Member, or in his or her absence, the President of the Board, will disclose a possible conflict of interest to other members of the Board before any vote on the ADAPT HV business transaction; and, such disclosure will be recorded in the minutes of the Board meeting at which it is made.

Any ADAPT HV business transaction which involves a possible conflict of interest with a Board Member will have terms which are at least as fair and reasonable to ADAPT HV as those which would otherwise be available to ADAPT HV if it were dealing with an unrelated party.

The Board President, after receiving information about a possible conflict of interest, will take such action as is necessary to assure that the transaction is completed in the best interest of ADAPT HV without the substantive involvement of the person who has the possible conflict of interest. (This does not mean that the purchase or other transaction must necessarily be diverted, but simply that persons other than the one with the possible conflict will make the judgments involved and will control the transaction.)

A written record of any report of possible conflict of interest and of any adjustments made to avoid possible conflicts of interest will be recorded in the Board minutes.

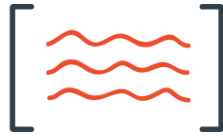
**CEO, EXECUTIVE AND SENIOR  
MANAGEMENT STAFF: DISCLOSURES**

The CEO and each Executive and Senior Management Staff will complete a questionnaire regarding possible conflicts of interest on an annual basis. The CEO or Executive and Senior Management Staff who may be involved in any ADAPT HV business transaction in which there is a possible conflict of interest will promptly notify his or her immediate supervisor; the CEO would notify the Board President. The questionnaires are reviewed by the Compliance Officer and if necessary appropriate actions are taken. Any significant concerns regarding the Conflict of Interest Questionnaires will be brought to the attention of the Compliance Committee, CEO and President of the Board of Directors.

The CEO and Executive and Senior Management Staff will refrain from participating in deliberations concerning any potential conflict of interest, or using personal influence in any way in the

matter. Any ADAPT HV business transaction which involves a possible conflict of interest will have terms which are at least as fair and reasonable to ADAPT HV as those which would otherwise be available to ADAPT HV if it were dealing with an unrelated party.

<i>Version number</i>	<i>Summary of changes</i>	<i>Effective date</i>
1.00	Original	6.27.2022
2.00	Revision	5.15.2023
3.00	Approved by CC	2.2.2026



### 1. Purpose:

ADAPT of the Hudson Valley (referred to as “ADAPT HV”) has established a process to identify and address potential violations of law and compliance issues and to self-disclose to appropriate governmental agencies any events or issues that require the return of prior payments made by government agencies, such as Medicaid or Medicare, and other events or compliance issues listed in Section 4.3.1 of this Policy (“Reportable Events”).

### 2. Policy:

ADAPT HV will report to appropriate governmental agencies any potential compliance issues and violations of law or regulation, such as the improper submission of claims for reimbursement, unacceptable practices, fraud, abuse or mistake, that require the return of prior payments made to ADAPT HV (“Overpayments”), and ADAPT HV will make any refunds that are necessary. Furthermore, ADAPT HV will report to the appropriate governmental agencies any Reportable Events that have occurred.

If there is an indication that ADAPT HV received an Overpayment or has learned of a Reportable Event, the Compliance Officer or designee will investigate the allegations or underlying facts, quantify the amount of funds ADAPT HV was otherwise not due, and ensure that any errors are corrected and refunds are made to governmental agencies

in the appropriate timeframes. The Compliance Officer, with advice of the Compliance Committee and CEO, may determine that it is necessary to communicate Overpayments or Reportable Events directly to the New York State Office of the Medicaid Inspector General (“OMIG”), the New York State Office for People with Developmental Disabilities (“OPWDD”), the Department of Justice, the Department of Health and Human Services Office of Inspector General, and/or other appropriate state or federal governmental agencies.

### 3. Scope:

This policy applies to all ADAPT HV employees or contractors who encounter billing or reimbursement issues that may require the return of Overpayments or who may encounter one or more Reportable Events (“Responsible Employees”). This also applies to the Chief Executive Officer, Senior administrators, managers, contractors, agents, subcontractors, independent contractors, vendors, interns, volunteers, governing bodies, the board of directors and corporate offices.

### 4. Procedures:

- 4.1. The Compliance Officer must be informed of any potential Overpayments or Reportable Events (employees can report directly to the Compliance Officer, their supervisor or other management staff or, alternatively, use the Compliance & Ethics hotline) in accordance with

## COMPLIANCE

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the Code of Conduct and the Policy on Billing Incident Review. Failure to report a potential Overpayment or Reportable Event will subject that employee to discipline up to, and including, termination in accordance with ADAPT HV's Policies on Reporting Compliance Concerns (Compliance, Ethical Responsibility, Reporting and Investigation Policy).

4.2. The Compliance Officer or his/her designee is responsible for ensuring that ADAPT HV properly discloses all Overpayments, and makes any reports and refunds that are necessary within the timeframes listed in Section 4.2.3 of this Policy.

4.2.1. Once learning of a potential Overpayment, the Compliance Officer in conjunction with the Billing Incident Review Committee, if appropriate, will investigate the underlying facts and cause.

4.2.2. The Compliance Officer may engage outside legal counsel, auditors, or other consultants to help determine whether an Overpayment has occurred.

4.2.3. Once identifying that an Overpayment has occurred, the Compliance Officer has sixty (60) days to quantify the amount that must be refunded. If the Compliance Officer, with help of outside legal counsel, auditors, or other consultants, as needed, is unable to quantify the amount to be refunded within sixty (60) from the date

## CC-6 SELF REPORTING AND SELF DISCLOSURE

on which the Overpayment was identified, then the Compliance Officer will notify the appropriate governmental agency that ADAPT HV has learned of a potential Overpayment and that it is currently undertaking efforts to quantify the amount of the Overpayment to be refunded. In the communication with the governmental agency, the Compliance Officer will provide the governmental agency with an estimate of when such work will be completed.

4.2.4. Once quantified, ADAPT HV will refund the Overpayment to the appropriate governmental agency in accordance with any guidance, protocols or procedures issued by the governmental agency to which the refund will be made.

4.2.5. The Compliance Officer shall maintain a log of all Overpayments that have been disclosed to governmental authorities pursuant to this Policy. The log shall include the following information:

4.2.5.1. The date that the Overpayment was disclosed and/or refunded;

4.2.5.2. The cause of the Overpayment;

4.2.5.3. The amount of the Overpayment; and

4.2.5.4. An explanation of the corrective action taken to

## COMPLIANCE

## CC-6 SELF REPORTING AND SELF DISCLOSURE

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prevent the Overpayment from recurring.

administrative laws that are applicable to ADAPT HV;

4.2.6. The Compliance Officer is responsible for taking all necessary actions to ensure that corrective action is taken by ADAPT HV to prevent the same or similar Overpayments from occurring in the future.

4.3.2. Once learning of a potential Reportable Event, the Compliance Officer will investigate the underlying facts and cause, if necessary.

4.2.7. A report of Overpayments will be recorded on the compliance log and reported to the Compliance Committee on a quarterly basis, and at least annually to the Board of Directors.

4.3.3. The Compliance Officer may engage outside legal counsel, auditors, or other consultants to help determine whether a Reportable Event has occurred.

4.3. The Compliance Officer is responsible for ensuring that ADAPT HV properly discloses all Reportable Events to the OMIG and/or other applicable governmental agencies, even if such Reportable Events do not also constitute Overpayments.

4.3.4. Once identifying that a Reportable Event has occurred, the Compliance Officer will notify the applicable governmental agencies, in writing.

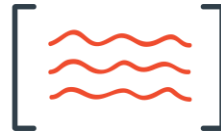
4.3.1. The following are Reportable Events:

4.3.5. The Compliance Officer is responsible for taking all necessary actions to ensure that corrective action is taken by ADAPT HV to prevent the same or similar Reportable Events from occurring in the future, when applicable.

4.3.1.1. Any conduct by employees, contractors, or agents of ADAPT HV that constitutes an “unacceptable practice” as defined in New York Medicaid regulations (18 N.Y.C.R.R. § 515.2);

<i>Version number</i>	<i>Summary of changes</i>	<i>Effective date</i>
1.00	Original	6.27.2022
2.00	Revision	5.15.2023
3.00	Approved by CC	2.2.2026

4.3.1.2. Any conduct by ADAPT HV that would constitute a probable violation of criminal, civil, or



**POLICY:**

**General Principles**

ADAPT of the Hudson Valley (“ADAPT HV”) is committed to the principle that all persons shall have equal access to programs, facilities, services and employment without regard to personal characteristics not related to ability, performance or qualifications by ADAPT HV policy and/or applicable laws.

ADAPT HV prohibits discrimination, harassment, bullying, intimidation and retaliation against any person because of age, culture, language spoken, ancestry, color, disability, national origin, race, religion, spiritual beliefs, gender, sexual or affectional orientations, gender identity, appearance, matriculation, political affiliation, marital status, veteran status, socioeconomic status, or any other characteristics protected by law. ADAPT HV requires that its employees, volunteers, members, consultants, contractors, and other constituents of ADAPT HV, when and where ever those individuals are conducting ADAPT HV business or participating in ADAPT HV events or activities, shall maintain an environment free of discrimination, including harassment, bullying, intimidation or retaliation.

**Applicability**

This policy applies to all ADAPT HV employees, including the Chief Executive Officer, Senior administrators, managers, contractors, agents, subcontractors, independent contractors, interns, volunteers, vendors, governing bodies, the board of directors and corporate offices.

**Definitions**

**Discrimination** – treating people differently, either preferentially or with adverse impact,

because they have similar characteristics or because they are from specific groups, unless differential treatment is reasonable, essential and directly related to conducting ADAPT HV business.

**Harassment** – one form of discrimination. Harassment is defined as conduct that has the purpose or effect of unreasonably interfering with an individual’s participation in ADAPT HV activities or creating an intimidation, hostile or offensive environment. (also see ADAPT HV’s Sexual Harassment Policy)

**Bullying** – one form of harassment. Bullying consists of waging an ongoing and systematic campaign of interpersonal destruction against an individual or group of individuals that a reasonable person would find hostile and offensive. It tends to be an accumulation of many incidences over a long period of time, including treatment which persistently provokes pressures, frightens, intimidates or otherwise discomforts another person.

**Intimidation** – actions or verbalizations directed toward an individual or group of individuals for exercising their employee rights with the intention of making the individual or group of individuals timid or fearful in an effort to deter that individual or group’s actions or behavior.

**Retaliation** – punitive actions taken against persons for exercising their employee or other rights under the laws in good faith, reporting violations of the laws to the proper authorities (i.e. “whistle blowing”) and/or participating in administrative or legal proceedings as a plaintiff, complainant or witness.

## IMPLEMENTATIONS

### Mediation and Enforcement

For the people supported by the agency, allegations of discrimination, harassment and bullying are managed according to the ADAPT HV Incident reporting policy and procedure.

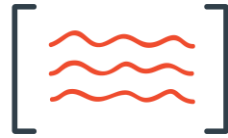
For staff, consultants, and contractors, ADAPT HV's Human Resources Department shall have the primary responsibility for oversight of this policy including resolving complains of discrimination, harassment, bullying, intimidation and retaliation. Any person who believes that he or she has been the victim of illegal discrimination or harassment should contact ADAPT HV's Director of Human Resources at (845) 695-2505

An investigation shall be conducted to reach a determination on the merits of allegations. Such an investigation may be conducted by ADAPT HV staff, legal counsel or other individuals deemed qualified to do so. If there is evidence of discrimination, harassment, bullying, intimidation and/or retaliation, ADAPT HV shall make every reasonable effort to ensure the discrimination, harassment, bullying, intimidation or retaliation immediately stops and does not recur. The complainant shall be informed of the corrective measures taken. Disciplinary sanctions for violation of policy, which may range from disciplinary warning to termination or expulsion from ADAPT HV, will be imposed in accordance with applicable ADAPT HV policies. ADAPT HV's Chief Executive Officer (CEO) shall be informed of all allegations. If the complaint is against the ADAPT HV CEO, ADAPT HV's Compliance Officer and Board of Directors shall be informed.

ADAPT HV prohibits intimidation and retaliation and any behavior that might be perceived as intimidating or retaliatory in

nature. Intimidation and retaliation shall constitute separate violations and may result in a sanction independent of the outcome of a complaint.

<i>Version number</i>	<i>Summary of changes</i>	<i>Effective date</i>
1.00	Original	6.27.2022
2.00	Revision	5.15.2023
3.00	Approved by CC	2.2.2026



**COMPLIANCE**

**CC-8 COMPLIANCE  
TRAINING**

**PURPOSE:**

The purpose of this policy is to ensure all, employees, including the Chief Executive Officer, senior administrators, managers, contractors, agents, subcontractors, independent contractors, volunteers, interns, governing bodies, the board of directors and corporate offices receive the necessary training to comply with ADAPT of the Hudson Valley’s (“ADAPT HV”) Compliance Program. This training includes utilization of ADAPT HV’s compliance reporting procedures to report suspected fraud, theft, misuse of resources and/or ethical misconduct.

**POLICY:**

ADAPT HV will provide training on its Compliance Program including Compliance reporting requirements to all staff during Pre-service orientation for all new employees. Post-testing will occur to ensure all new employees have a clear understanding of ADAPT HV’s Compliance Program and Compliance reporting requirements.

On an annual basis, all Executive Staff, employees, independent contractors, volunteers, and interns will receive training on ADAPT HV’s Compliance Program and reporting requirements. Training will include a post-test to ensure clear understanding of the Compliance Program and reporting requirements.

Within their first three months of employment, new Directors will receive a train-the-trainer Compliance Training by the Compliance Officer to ensure Directors have the necessary

tools and skills to provide Compliance training to their respective staff, independent contractors, volunteers and interns.

On an annual basis, the Board of Directors will receive Compliance Training by the Compliance Officer.

On an annual basis, ADAPT HV vendors will be provided a mailing which includes ADAPT HV’s Compliance Plan, Incident Reporting Policy, and basic education on ADAPT HV’s Compliance reporting requirements. Included with this mailing will be the contact information for the Compliance Officer to ensure that vendors have the opportunity to ask questions regarding ADAPT HV’s Compliance Program and have the means to report any Compliance related concerns.

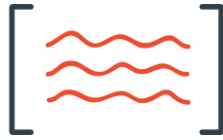
**PROCEDURES:**

The Compliance Officer is responsible for developing the Compliance Program training.

The Compliance Officer will track and ensure all Senior Staff and Administrative support staff receive training on an annual basis.

Directors will track and ensure all staff, interns, volunteers and independent contractors associated with their programs receive compliance training on an annual basis.

<i>Version number</i>	<i>Summary of changes</i>	<i>Effective date</i>
1.00	Original	6.27.2022
2.00	Revision	5.15.2023
3.00	Approved by CC	2.2.2026

**PURPOSE**

The purpose of this policy is to ensure that ADAPT of the Hudson Valley (ADAPT HV) screens and does not employ or conduct business with individuals or entities who are restricted, terminated or excluded from the Medicaid program.

**POLICY**

ADAPT HV will conduct exclusion checks utilizing the exclusion check resources recommended by the Office of the Medicaid Inspector General. The databases utilized to conduct these checks are:

- The U.S. Department of Health and Human Services (HSS)
- The Office of Inspector General (OIG)
- The U.S. General Services Administration (SAM)
- The New York State Office of the Medicaid Inspector general (OMIG)

ADAPT HV's Human Resources Department will ensure that all prospective employees are checked against the Medicaid Exclusion List prior to beginning employment with the agency. Any prospective employees found to be restricted, terminated or excluded from participation in the Medicaid program will not be hired by the agency.

On a monthly basis, ADAPT HV's Human Resources, Purchasing and Compliance Staff will check all employees, Executive Staff, Board Members, independent contractors and vendors utilized by the agency against the HSS, OIG, SAM and OMIG Exclusion Databases. Any matches involving individuals or entities who are noted to be restricted, terminated or excluded from the Medicaid

program will be referred to the Compliance Officer. The

Compliance Officer with input from the Compliance Committee and Director of Human Resources will ensure that no excluded individual or entity shall perform any procedure, provide or order services and/or serve as a Board Member of ADAPT HV.

It is the responsibility of all staff, Executive Staff and Board Members to inform the Compliance Officer of any change in status which may cause an individual or entity to become restricted, terminated or excluded from participation in the Medicaid program

**PROCEDURES**

1. Human Resources Staff: Check all prospective employees against the HSS, OIG, SAM, and OMIG databases to ensure prospective employees are not restricted, terminated or excluded individuals.

2. IT Department Staff or designee: On a monthly basis on or about the 15<sup>th</sup> of every month runs exclusion check reports for Human Resources, Purchasing, Compliance Staff, and the Compliance Officer. Generated reports include staff, Executive Staff, Board Members, independent contractors and vendors.

3. Human Resources Staff: Compares exclusion check results provided by the IT Department to current staff employed by the agency to ensure that employees are not restricted, terminated or excluded from the Medicaid program. Results of this check are shared with the Compliance Officer no later than the end of the month in which the exclusion check was generated.

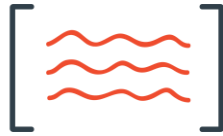
4. Purchasing Department Staff: Compares exclusion check results provided by the IT Department to independent contractors and vendors to ensure that independent contractors or vendors are not restricted, terminated or excluded from participation in the Medicaid program. Results of the check are shared with the Compliance Officer no later than the end of the month in which the exclusion check was generated.

5. Compliance Officer: Compares the exclusion check results provided by the IT Department with Board Members to ensure that no Board Members are restricted, terminated or excluded from the Medicaid program.

6. Compliance Officer: Reviews the results of the exclusion checks provided by Human Resources and Purchasing Department staff.

7. Compliance Officer: Ensures the Compliance Committee is aware of any exclusion check matches involving individuals or entities and takes appropriate action to ensure that the agency terminates its relationship with any individuals or entities who are restricted, terminated or excluded from the Medicaid program.

<i>Version number</i>	<i>Summary of changes</i>	<i>Effective date</i>
1.00	Original	10.10.2022
2.00	Approved by CC	2.2.2026



**COMPLIANCE**

**CC-10 CRIMINAL ACTION**

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**POLICY**

It is the policy of ADAPT of the Hudson Valley (“ADAPT HV”) to recognize, stop and report, to the appropriate authorities, any criminal activity on agency premises or under the auspices of the agency if involving people supported or employed by the agency.

enforcement with any investigation. The Vice President of Program Services or designee will also act as the central contact person for ADAPT HV to ensure that appropriate and recommended corrective actions are taken by the agency following any external and/or internal investigation.

**IMPLEMENTATION**

In any case of suspected criminal activity, staff shall follow established emergency protocols and then immediately notify their supervisor who in turn will ensure Vice President of Program Services, Compliance Officer and Director of Human Resources are notified of the incident. For incidents which do not involve immediate danger, the Vice President of Program Services or designee will contact the appropriate authorities.

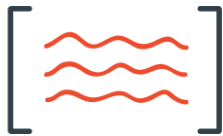
If the perpetrator or victim of a crime is a person supported by ADAPT HV, the agency incident reporting procedures are also followed to ensure compliance with oversight agency requirements.

If there is imminent danger to people or property, 911 shall immediately be called by the staff member present. If imminent danger exists, staff shall ensure that others in the building or in the area are moved to a secure location and that their needs are addressed to minimize any additional impact of the crime.

<i>Version number</i>	<i>Summary of changes</i>	<i>Effective date</i>
1.00	Original	6.27.2022
2.00	Approved by CC	2.2.2026

When law enforcement or 911 is involved staff will secure the area and not tamper with a potential or actual crime scene or allow anyone else to tamper with the crime scene until authorized.

The Vice President of Program Services or designee will ensure full cooperation with the law

**CC-11 SECURITY &  
SUBPOENAS****POLICY:**

ADAPT of the Hudson Valley (“ADAPT HV”) will ensure and provide for a secure and safe environment for the people we support, staff and visitors. All staff are responsible for protecting the security of the people we support and the protection of one another, ensuring our building sites and premises are safe and secure, ensuring agency equipment is in proper working order, and addressing any related security measures.

**IMPLEMENTATION:**

Every site shall implement security practices that are designed to ensure that security and safety are maintained for everyone.

All staff are responsible to ensure security. If security issues arise (such as broken locks, lighting issues, problems in storage of valuables, etc.), staff are required to inform their Supervisor or other responsible parties immediately to ensure that problems are resolved quickly.

**ID BADGES:**

Every employee of ADAPT HV shall be issued an identification badge. Staff are required to carry their agency identification (I.D.) and show it when requested upon entering any ADAPT HV building or program.

Visitors will be required to sign in and out and to communicate the nature of their business and who they are meeting with.

The Program Director or designee will ensure the log books/sheets are available, utilized, maintained and filed appropriately. As appropriate, visitors may be provided with a temporary identification badge which shall be displayed on their person.

Staff shall alert someone in authority if they see someone they feel should not be in the building or if they see something that makes them concerned that security may be compromised. Employees who observe the presence of strangers or unaccompanied visitors should escort that person to their destination, or when necessary, escort the person from the building. Should a person we support make staff aware of an unusual or unauthorized presence, the above procedures should be followed.

**BREACHES IN SECURITY:**

All people supported, staff and visitors will be alerted to breaches in security and ensure that everyone is moved to a safe location away from harm or problems whenever possible. If a problem arises that involves a major security issue, staff shall follow the directions of the Police Department or other authorities present regarding what to do, how to proceed, and how to ensure everyone’s safety.

If the security problems pose immediate danger, the Onsite Manager/Supervisor will immediately alert local police, fire, or emergency personnel and ensure that all people have been moved to a safe and secure location. Staff and people supported are not to intervene in security matters. Trained personnel and local police will address issues and resolve security matters.

## COMPLIANCE

## CC-11 SECURITY & SUBPOENAS

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### **SEARCH WARRANTS/SUBPOENAS:**

No subpoenas are to be accepted by any agency staff at any location other than 420 Schutt road extension, Middletown, NY, 10940 (The Administrative Building). Process servers who attempt to serve subpoenas at any other locations should be directed to The Administrative Building. When at the Administrative Building, only members of the ADAPT HV Executive staff may accept a subpoena.

Under no circumstances should any staff, including staff at The Administrative Building, accept a subpoena which does not name the agency as the intended recipient. Process servers who attempt to serve personal subpoenas against a person supported or agency employee should be instructed that the agency policy does not provide for this action. Instead, they should be advised to serve the subpoena to the individual at another venue. If the process server ignores this direction and leaves a subpoena, the recipient should forward the unopened subpoena to the Compliance Officer at The Administrative Building for Executive Staff follow up.

Staff who receive an inquiry from an external source (i.e. governmental agency or attorney) regarding ADAPT HV shall immediately notify their Supervisor who in turn should contact the Compliance Officer who will immediately evaluate any inquiry received and initiate appropriate follow up action.

In the case of a subpoena seeking ADAPT HV records in a matter related to business of ADAPT HV, the Compliance Officer will report the matter to the Chief Executive Officer (CEO). The CEO will notify the Board of Directors as necessary. Staff should not discuss ADAPT HV business with any individual unless

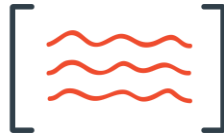
authorized to do so. ADAPT HV reserves the right to charge copy fees for staff records and other organizational files.

Regarding matters that center on Protected Health Information, refer to ADAPT HV's HIPAA Policy: Use and Disclosures Requiring Authorization in ADAPT HV's HIPAA Policy and Procedure Manual.

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<b>Version number</b>	<b>Summary of changes</b>	<b>Effective date</b>
1.00	Original	8.1.2022
2.00	Approved by CC	2.2.2026

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**HR-12 STANDARDS OF DISCIPLINE**

**PHILOSOPHY:**

ADAPT of the Hudson Valley (“ADAPT HV”) is committed to fostering a coaching culture to develop and train employees.

**APPLICABILITY:**

This policy applies to all employees, including the Chief Executive Officer, senior administrators, managers, contractors, agents, subcontractors, independent contractors, vendors, governing bodies, the board of directors and corporate offices. For this policy, the above-mentioned group will be referred to as “affected individuals”.

**POLICY:**

As required, ADAPT HV has established disciplinary standards and implemented procedures for the enforcement of such standards to address potential violations and encourage good faith participation in the compliance program by all affected individuals. These standards require that all affected individuals adhere to the organization’s written policies, procedures, and standards of conduct. Additionally, affected individuals must follow all state and federal laws, rules, and regulations. Failure to adhere to those requirements will result in disciplinary sanctions which include but are not limited to oral or written warnings, suspension, revocation of a business partnership or termination.

**IMPLEMENTATION:**

In developing and enforcing its disciplinary standards, ADAPT HV will disseminate the written policies and the Code Of Conduct establishing these standards to all affected individuals on an annual basis or upon revision to the program’s requirements. ADAPT HV will also incorporate review of the disciplinary

standards into all training conducted with affected individuals on an annual basis.

ADAPT HV will enforce its disciplinary standards fairly and consistently, and the same disciplinary action will apply to all levels of personnel, regardless of titles or seniority.

In cases where the affected individual is not an employee of the agency and is not subject to disciplinary action, the agency may suspend or revoke its business relationship with that affected individual.

**PROCEDURE:**

Any disciplinary action requires the involvement of Program Administration and Human Resources. Draft discipline should be written by the appropriate supervisor and sent to [HR@adapthv.org](mailto:HR@adapthv.org). All discipline needs to be reviewed by HR before it is issued. Once a written discipline has been approved by HR, it should be issued by the supervisor (s).

<i>Version number</i>	<i>Summary of changes</i>	<i>Effective date</i>
1.00	Original	5.15.23
2.00	Revision	2.26.25
3.00	approved	2.2.2026





**ADAPT of the Hudson Valley's Code of Ethics** provides guidelines as to how we should act. All employees, clinicians, independent contractors and vendors are expected to report any violation of the agency's Code of Ethics, including fraud, theft or misuse of resources, harassment, discrimination or abuse.



**You can report your concerns to:**

- Your Supervisor
- Your Program Director
- The Department Head or Coordinator who oversees your program

**You can also call or contact:**

Vincent Carlucci,  
Compliance Department  (845) 695 2586  VCarlucci@adapthv.org

ADAPT of the Hudson  
Valley Ethics Hotline  (833) 523 2525

Christine Sutton, Human  
Resources Department  (845) 695 2505  CSutton@adapthv.org

If you make a report in good faith, your identity will remain confidential to the extent allowed by law and you will be protected from retaliation.

**Thank you for helping to create an ethical workplace.**