

	Date Issued 9/25/25	Date of Last Review/Revision	Page 1 of 4	Item No. CDSLT COMP 40
	Check all that Apply: ☒ All ☐ CDSLT ☐ CDSM ☐ CDS Rx ☐ CDS Wolf Foundation ☐ CDS Housing ☐ Unistel Industries ☐ Warrior Salute Veteran Services ☐ CDS Veterans Services ☐ iCircle ☐ Prime Care Coordination			
	Check all that Apply		Programs/Services	
	☒ All	☐ Facilities	☐ Clinical	☐ IRA
	☐ Administration	☐ HR/Training	☐ Comm Hab	☐ Pre-Vocation
	☐ Business/Finance	☐ IT	☐ Day Hab	☐ Self-Directed
	☐ Compliance/ Quality Improvement	☐ Public Relations/ Marketing	☐ Family Care	☐ SEMP
			☐ Family Support Services	☐ Transportation
	Topic: Standards of Conduct			
	Attachments/Related Forms:			
Policy Review Frequency Annually	Policy and Procedure Department Authority: Patricia Arcese, Executive VP of Corporate Compliance			
Training Method Electronic Training Platform	Author/Reviewed/Revised by: Patricia Arcese, Executive VP of Corporate Compliance			
Training Frequency Annually				

REGULATORY AND POLICY REFERENCES:

18 NYCRR Part 521

POLICY

CDS Life Transitions (CDSLT) and its affiliates (herein CDSLT) are committed to operating in a manner that demonstrates strong business ethics and corporate accountability. Our Corporate Compliance Program supports that commitment. A key element of this is our formalized Standards of Conduct which apply to all Personnel defined as board members, executives, leadership, staff/employees, vendors, contractors, consultants and volunteers.

It is the expectation of CDSLT that its companies will comply with all applicable laws and regulations and conduct business with the highest degree of integrity. Personnel must obey laws and regulations that govern their work and act in the best interest of those who receive services and the organization.

Personnel are expected to perform with honesty in their work for the organization, with service recipients, stakeholders, other providers, suppliers, and all others with whom the organization does business.

Personnel shall act in an ethical manner within the workplace, including but not limited to the following:

- Laws and regulations – Personnel must be familiar with and follow the laws and regulations that govern their work-related activities.
- Policies and procedures – Personnel must be knowledgeable of and follow all policies and procedures.
- Conflict of Interest – Personnel will report any potential conflict of interest with CDSLT.
- Scope of practice – Personnel must act in a manner that is consistent with their professional scope of practice.
 - Licensed and/or certified Personnel must perform job-related activities that are within their level of competence, within their professional boundaries, and must follow discipline specific codes of ethical conduct.

- Non-licensed or non-certified Personnel must perform job duties that are within their job descriptions or contracts and for which they have received appropriate training. They may not perform duties that are within the restricted scope of practice of a licensed/or certified profession.
- Protect the rights of individuals and strive to enhance their quality of life.
- Treat all individuals with dignity and respect.
- Actively promote CDSLT positive reputation in the community and refrain from engaging in activities that may tarnish that reputation.
- Report any abusive and/or neglectful treatment they witness immediately in accordance with regulation and policy.
- Promptly report all suspected violations of the Standards of Conduct, Corporate Compliance Plan, operational policies, and laws or regulations.
- Deliver quality services in accordance with the person's plan of service.
- Maintain compliance with required training.
- Respect and protect the confidentiality of service recipients, Personal Health Information (PHI) and Personal Identifiable Information (PII). Such information may only be released with proper authorization.
- Ensure confidential information obtained is held in confidence during your tenure and upon leaving the agency.
- Report any observed misuse of CDSLT's property.
- Only bill for services rendered which are documented in the person's record in accordance with policy. If the service must be coded, then only billing codes that accurately describe the service provided will be used.
- Maintain accurate, complete and contemporaneous case records and billing records (paper and electronic), as applicable, in accordance with policy, regulation and data retention requirements.
- Falsification of records is prohibited:
 - You may not make any false entries in CDSLT records or in any public record for any reason.
 - You may not alter any documented entry in CDSLT records. If a correction needs to be made it must reflect the date of change, the name, signature, and title of the person making the change, and the reason for the change.
 - You may not create or participate in the creation of records that are intended to mislead or to conceal anything that is improper.
 - Backdating or predating record documentation is prohibited.
- Ensure reports and other information required to be provided to a federal, state, or local government agency are accurate, complete, and filed on time.
- Take every reasonable precaution to ensure that work is accurate, timely, and in compliance with federal and state laws, regulations, and policies.
- Ensure that no deficiency or error is ignored or covered up. Problems should be brought to the attention of those who can properly assess and resolve the problem.
- Immediately report any unsafe working conditions.
- Promote a safe and supportive work environment.
- Abide by CDSLT Information Technology policies, including CDSLT ISMP 002 – IT Acceptable Use Policy.
- Do not conduct outside business activities during CDSLT work time.
- Personnel of CDSLT affiliate Prime Care Coordination must remain free from situations that are restricted by Conflict Free Care Management federal regulations.

CDSLT Personnel shall not:

- Abuse, mistreat, or neglect any individual.
- Engage in discriminatory treatment, harassment, abuse, or intimidation of others.
- Distribute, sell, possess, purchase, or consume legal and/or illegal drugs, substances, or alcohol while working. All CDSLT locations are smoke-free, alcohol-free, and drug-free.
- Come to work and/or work if their ability to perform their job is impaired due the use of alcohol, a controlled substance, a legal or illegal drug/substance, a prescribed medication, or over the counter medication.

- Use CDSLTS or a service recipients resources, or permit others to do so.
- Reveal or use any confidential information concerning CDSLTS for personal gain.
- Carry firearms or other weapons on CDSLTS grounds or while in the capacity of providing services to an individual, or when acting on behalf of CDSLTS in the community.
- Accept gifts of cash, cash equivalents, or gift cards (which are never allowed). Acceptance of gifts from outside of CDSLTS is acceptable only if they are of nominal value (\$15 or less) and can be shared among employees or clients (example: baked goods).
- Provide any gift, favor, or entertainment if it will obligate or appear to obligate the person who receives it.
- Solicit or accept personal gratuities, favors or anything of significant monetary value from any third party when engaging in the award and administration of contracts or other financial awards.
- Accept kickbacks or rebates.
- Participate in any financial interaction with a service recipient or their family.
- Borrow or take property from a service recipient for personal use.
- Form inappropriate social relationships with a service recipient or engage in any form of sexual activity with a service recipient
- Engage in any business activity that is unethical or an illegal activity.
- Submit claims for payment or reimbursement that are false, fraudulent, inaccurate, or fictitious.
- Use CDSLTS funds or assets for any improper purpose.

Violations:

- Violations of the CDSLTS Standards of Conduct may result in disciplinary actions up to and including termination. Disciplinary action will be consistently and fairly applied. CDSLTS will consider the following factors in determining the level of disciplinary action:
 - Intent: An intentional or willful violation, where Personnel knowingly fails to comply will be met with more severe penalties than an accidental or inadvertent violation.
 - Severity: The seriousness of the offense directly impacts the level of discipline.
 - Previous history: Repeated instances of misconduct will lead to escalating discipline.
 - Job role: A violation committed by a supervisor or executive can warrant a higher level of discipline due to their fiduciary duty and position of authority
 - Impact: The consequences of the violation are considered, including the harm caused to individuals, the company, or the public
- Personnel who knowingly fail to report compliance concerns are subject to disciplinary action up to and including termination.

Seeking Guidance and Reporting Violations:

Personnel are required to report any suspected fraud, waste, and abuse; illegal or unethical acts; actual or suspected violations of Federal or State laws and regulations; actual or suspected violations of the CDSLTS Standards of Conduct, the Compliance Program, CDSLTS Policies/Procedures; improper acts in the delivery or billing of services; and other wrongdoing to:

- Your immediate supervisor,
- Member of Management,
- Compliance Committee member,
- Compliance Officer – CDSLTS EVP of Corporate Compliance – by phone 585-347-1274, in person, or via email compliance@csls.org or Diane Frederico – iCircle VP of Quality and Compliance – 585-857-0569, in person, or via email diane.frederico@icirclecny.org.
- 24/7 Confidential/Anonymous Compliance Hotline (1-833-202-5117 English) or (1-800-216-1288 Spanish).

When actual or suspected noncompliance is reported to Personnel other than the Compliance Officer, they are required to promptly report the concern to the Compliance Officer. Steps will be taken to protect the confidentiality of and anonymity of the reporters. CDSLTS will not tolerate any form of retaliation or intimidation against a person who makes a good-faith report in accordance with the Standards of Conduct and Compliance Program.

All Personnel must cooperate fully and honestly in any investigation into reported noncompliance.

Questions may be directed to the CDSLT EVP of Corporate Compliance, CDSLT VP of Compliance and Quality Improvement, or iCircle VP of Quality and Compliance.