ADAPT
COMMUNITY NETWORK

[we change]






CODE OF CONDUCT

[adaptcommunitynetwork.org]

Message from the CEO



On behalf of the individuals we support and their families, I am honored to welcome you to the ADAPT community. You are joining an organization deeply committed to creating meaningful opportunities and improving quality of life for children and adults with disabilities and their families.

ADAPT Community Network is a diverse and dynamic organization, offering more than one hundred programs that span early childhood education, residential services, day programs, and more. Our mission is simple yet powerful: empowering people through innovative solutions, one person at a time. We are grateful to have you as a part of our team and look forward to seeing how your perspective and experience adds to the culture of this organization. Your dedication and contributions play an essential role in the well-being and success of the people we support.

Our Employee Code of Conduct is designed to provide guidance and support as you begin and grow in your career at ADAPT. I encourage you to read it carefully, save it, and use it as a resource. Adhering to our Employee Code of Conduct is key to your success within the agency as well as helping to foster a culture of safety and respect.

Thank you for choosing ADAPT Community Network as your employer! We hope your experience here is both fulfilling and meaningful.

Work Hard! Have Fun! Make a Difference!

With appreciation,

Jenna Mandel-Ricci

Jenna Mandel-Ricci

Chief Executive Officer

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's Compliance Program as an integral part of our mission and operations

Work Environment

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

Our Compliance Program

ADAPT 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 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

- 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 Senior VP 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

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 you may acquire confidential information about the people we support, ADAPT 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 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's financial support comes from government. Therefore, we are subject to laws designed to combat fraud, waste, and abuse. **ADAPT 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

- **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 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 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. 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 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

- You must support ADAPT'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 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 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

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 requires that employees **respect the rights and privacy of the persons we support** and the reputation of ADAPT when engaging in social media.

- Do not post any pictures or comments involving ADAPT or other employees that could be construed as inappropriate.
- Do not post any pictures or videos of the person 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's assets are strictly for the benefit of ADAPT and the people ADAPT serves. These assets include physical property like funds, equipment, furniture, office supplies and vehicles. ADAPT'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 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 checks the eligibility status of all employees and independent contractors as a part of the hiring/retention process. After hiring, ADAPT 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 Compliance Officer. If you become aware that any other person or entity with whom ADAPT has a business relationship has become ineligible or excluded, also report this immediately to the ADAPT Compliance Officer.

Record and Report Information Accurately

Many of ADAPT'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 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's computer systems—whether in electronic form or hard copy—for legitimate ADAPT 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 computer or network with your password.
- ADAPT requires you to comply with its Acceptable Use Policy. If you have any questions concerning information security, contact your supervisor, the Compliance Officer, Chief Information Officer or Security Officer.
- Any document produced or provided by you as an ADAPT employee, independent contractor, volunteer, or officer is the sole property of ADAPT. You may not destroy it or use it for any other purpose.

Political Activities and Contributions

ADAPT 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.).

Sleeping

ADAPT has a zero tolerance policy for sleeping. Employees are not permitted to sleep during work hours. Employees found sleeping will be subject to disciplinary action, up to and including termination of employment.

Corrective Action and/or Discipline

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

Any ADAPT 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 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 on agency premises.
- Violating safety and/or security rules and regulations.
- Leaving participants 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 will subject an employee to disciplinary action, 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 always support and maintain the good reputation and the integrity of the Agency.
- 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 employee or on ADAPT premises.
- You are to provide the required notice to management when reporting late or calling out.
- You are not permitted to smoke 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‘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 Senior VP of Human Resources
    - the ADAPT Compliance Officer

Version Number	Summary of Changes	Effective Date
1.0	Initial Version	

2.0	Updated Message from the CEO	October 2025
3.0	Updated Message from the CEO	October 2026

Acknowledgement

I acknowledge that I have received, read and understand the Code of Conduct of ADAPT Community Network.

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 Community Network.

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

_____

Signature

_____

Printed Name

_____

Date