

The Code of Conduct is a formal statement of CFH's commitment to the standards and rules of ethical conduct. CFH is committed to preventing the occurrence of unethical or unlawful behavior, stopping such behavior as soon as possible after discovery, and to discipline those who violate the Code, including those who neglect to report a violation.

ETHICS: CFH strives to deliver quality services, and conduct all service provision in an ethical and legal manner.

You are expected:

1. to keep management staff informed of what you are doing,
2. to document or record all services or transactions accurately,
3. to be honest and forthcoming with CFH, regulatory agencies, and internal and external auditors,
4. to function with honesty in your work for CFH and with people we serve, providers, suppliers and all others with whom CFH does business.

CONFLICT OF INTEREST: Placing business with any firm in which there is a family relationship may constitute a conflict of interest. Advance disclosure and approval are required in such a situation. You must promptly report any actual or potential conflicts of interest to your immediate supervisor or directly to the Compliance Officer.

It is a conflict of interest for you to:

1. personally take for yourself opportunities that are discovered through the use of CFH's property, information or position with CFH;
2. to use CFH property or information for personal gain; or
3. to compete with CFH.

EMPLOYMENT ENVIRONMENT: CFH is committed to creating a safe and professional workplace where employees and others are treated with respect. All CFH employees must exhibit and promote respect, integrity, trust and teamwork in the workplace.

You are required to:

1. support CFH's commitment to a safe, professional, and drug-free work environment,
2. refrain from discrimination, harassment and retaliation,
3. demonstrate appropriate behavior in the workplace,
4. refrain from joking about another's race, gender, age, religion, national origin, color, marital status, disability, sexual orientation or other protected characteristics.
5. refrain from considering someone's race, color, religion, gender, national origin, age, disability, sexual orientation or other protected characteristic in making decisions about hiring, placement, assignment of duties, training, promotion, termination, compensation, benefits and other work terms.

DOCUMENTATION: You must document accurately and honestly, and only for those services that you provided or those events you were involved in. All documentation shall be accurate, legible, complete, and filed on time.

You must not

1. omit or conceal any relevant information,
2. make any false entries in any of CFH's records or in any public record for any reason,
3. alter any permanent entries in CFH's records,
4. create or participate in the creation of any records that are intended to mislead or to conceal anything that is improper
5. falsify medical, time or other records that are used for the basis of submitting claims
6. document services not rendered

PROTECTION OF CONFIDENTIAL INFORMATION: During your employment, you may acquire confidential information about CFH, its staff and people we serve that must be handled in strict confidence and not discussed with outsiders. The protection of confidential business, staff and patient information is very important.



You must:

1. not release confidential information without the proper authorization.
2. avoid discussing or disclosing CFH information, purposefully or inadvertently (through casual conversation), to any unauthorized person inside or outside CFH.
3. not remove information from CFH's property without permission from a supervisor or administrator with proper authority over the information.

FAIR DEALING: CFH will not pursue any business opportunity that requires engaging in unethical or illegal activity. Kickbacks and rebates in cash, credit or other form are prohibited. They are not only unethical, but in many cases, illegal. The Anti-kickback law prohibits the offer of payment, solicitation or receipt of any form of remuneration for the referral of Medicare and Medicaid recipients.

You must not:

1. pay for referrals of patients
2. accept or provide benefits that could be seen as creating conflict between your personal interests and CFH's legitimate business interests
3. solicit money, gifts, gratitude or any other personal benefits or favors of any kind
4. offer or accept gifts or entertainment that is primarily intended to gain favor or to influence a business decision

FEDERAL AND STATE PROGRAMS: CFH is committed to preventing fraud, waste and abuse of state and federal funding, including but not limited to Medicaid and/or Medicare. Therefore, all final applicants, employees, contractors, and vendors will be screened to ensure they are not excluded/sanctioned from NYS OMIG or Centers for Medicare and Medicaid Services (CMS). Exclusion means that no payments can be made for items furnished, ordered, or prescribed by the excluded individual or entity.

CFH must:

1. only employ or work with persons with proper credentials, experience and expertise, and may, at any time, require documentation of such;
2. not employ and/or do business with individuals and entities excluded or sanctioned by any state or federal programs including but not limited to Medicaid and/or Medicare;
3. be notified of any name changes, and any involvement in non-compliant activities including health care related crimes;
4. perform inquiries into the background of applicants, employees, contractors, vendors and members of the Board of Directors; and
5. withdraw any job offer or agreement with an applicant, employee, contractor, vendor, or any other person or business who become, at any time, excluded from CMS. This includes terminating the employment of any person already employed with CFH.

The following organizations may be queried at any time, with respect to potential employees, contractors, vendors and members of the Board of Directors: System for Awards Management list of parties excluded from federal programs, HHS/OIG list of excluded individuals/businesses, NYS DOH/OMIG Medicaid Fraud Database, NYS Office of Professions, and the National Practitioner Data Bank.

REPORTING VIOLATIONS: Actual or suspected violations of this Code of Conduct must be reported to a supervisor or the Compliance Officer. CFH will not tolerate any form of retaliation against a person who makes a good-faith report. Full and honest cooperation is expected in any investigation into a reported violation. Anyone who violates or knowingly fails to report a violation is subject to appropriate disciplinary action, up to and including termination.