DePaul Corporate Compliance
Standards of Conduct Policy

Purpose:

DePaul (sometimes referred to as "Organization" or "the Organization") is committed to conducting its business ethically and in conformance with all Federal and State laws, regulations, interpretations thereof, and its Standards of Conduct. To support this commitment, DePaul will maintain and update as appropriate written Standards of Conduct to provide guidance on employee and organizational responsibilities related to compliance. The Standards of Conduct document serves as a foundational document that describes the Organization's fundamental principles, values, and commitment to conduct its business in an ethical manner.

For purposes of this Policy, the term "Affected Individuals" includes all persons who are affected by the required provider's risk areas including the required provider's employees, the president and other senior administrators, managers, contractors, agents, subcontractors, independent contractors, and governing body and corporate officers.

Policy:

It is the Policy of DePaul to develop, maintain, and update as appropriate written Standards of Conduct to provide Affected Individuals with guidance on requirements for conduct related to employment, contract, association, or appointment by DePaul.

Regulatory References:

Social Service Law 363-D
18 NYCRR Part 521

Procedures:

1. The Compliance Officer is responsible for the development and periodic update of DePaul's Standards of Conduct.

2. The Standards of Conduct will be reviewed at least annually as part of the review of the Compliance Plan and Compliance Program Policies and Procedures.

3. The Compliance Committee will be responsible for oversight and final approval of the Standards of Conduct.

4. The Standards of Conduct will be written at a basic reading level, avoiding complex language and legal terminology.

P&P: Standards of Conduct
Issue Date: 6/9/17
Effective Date: 6/9/17
Revision Date: 3/28/23
Review Date: 3/25/24
Review Date: 2/21/25
Review Date: 2/18/26

5. The Standards of Conduct will communicate the expectation that all Affected Individuals will act in accordance with the Standards of Conduct, that they must refuse to participate in unethical or illegal conduct, and that they must report any unethical or illegal conduct to the Compliance Officer.

6. The Standards of Conduct will address specific areas of potential fraud or similar wrongdoing (e.g., claims development, submission processes, and coding).

7. The Standards of Conduct will address critical areas such as compliance with laws and regulations, key human resource practices, conflicts of interest, proprietary rights, confidentiality, recordkeeping, service provision, reimbursement practices, fair dealing, gifts and kickbacks, and its measures to prevent fraud, waste, and abuse.

8. The Standards of Conduct will communicate the responsibility of Affected Individuals to report 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 Standards of Conduct, the Compliance Program and DePaul's policies and procedures; improper acts in the delivery or billing of services; and other wrongdoing (collectively referred to as "compliance concerns" for purposes of this Policy) directly to the Compliance Officer or other management personnel who in turn will report it directly to the Compliance Officer.

9. DePaul's confidential reporting and non-retaliation/non-intimidation policies will be referenced and included as part of the Standards of Conduct for the purpose of encouraging communication and the reporting of potential non-compliance.

10. The Standards of Conduct will provide written guidance on how Affected Individuals may report actual or suspected compliance concerns without fear of retribution, retaliation, or intimidation to the Compliance Officer through a confidential and/or anonymous mechanism that bypasses Management.

11. The Standards of Conduct will include a description of disciplinary mechanisms utilized by the Organization and the procedures for addressing disciplinary actions.

12. DePaul's Standards of Conduct and Compliance Plan will be made available to all Affected Individuals as defined by this Policy.

13. DePaul's Standards of Conduct and Compliance Plan will be posted on its website.

14. The Compliance Officer will ensure that all Affected Individuals, as defined by this Policy, are provided with a copy of the Compliance Plan and Standards of Conduct as part of their orientation to the Organization.

15. The Compliance Officer will ensure that each Board member is provided with a copy of the Compliance Plan and Standards of Conduct at the time of Board orientation.

16. All Affected Individuals will sign and date an Acknowledgement Form (attached to this Policy) (or similar format) that acknowledges: (a) receiving a copy of the Standards of Conduct, (b) reading and understanding the contents, and (c) agreeing to abide by the provisions of the documents.

17. The Compliance Officer will ensure that all Affected Individuals, as defined by this Policy, receive training annually related to the contents of the Standards of Conduct to help them understand how it applies to everyday situations. All training records are maintained to document the receipt of training.

18. The Compliance Officer will include in their report to the Compliance Committee and Board of Directors the status of training, along with any recommendations for updating or improving the contents of the Standards of Conduct and/or training.

19. The Compliance Officer is responsible for investigations of possible violations of the Standards of Conduct and Compliance Program and ensuring that appropriate disciplinary action has been taken when necessary.

Sanction Statement:

Non-compliance with this policy may result in disciplinary action, up to and including termination.

Compliance Statement:

As part of its ongoing auditing and monitoring process in its Compliance Program, DePaul will review this policy based on changes in the law or regulations, as DePaul's practices change, and, at minimum, on an annual basis. Additionally, this policy will be tested for effectiveness on an annual basis or more frequently as identified in accordance with DePaul's Compliance Program. Testing will include but is not limited to ensuring that the policy is appropriately followed; the policy is effective; the policy has been disseminated to all Affected Individuals, who will also be notified of any updates or changes.

Tracking of the criteria above and results of this testing will be completed by the Compliance Officer, or designee. Additionally, results will be reported to the Compliance Committee and Governing Body on a regular basis.

Record Retention Statement:

DePaul will retain this policy and all subsequent revisions, and any related documentation will be retained for a period of, at minimum, six years.

DePaul
Acknowledgement Form
Compliance Plan and Standards of Conduct

- ☐ I acknowledge that I have received and read, and that I understand, DePaul's Standards of Conduct.

- ☐ I understand that I must comply with DePaul's Standards of Conduct, and all laws, regulations, policies, procedures, and other guidance applicable to the responsibilities of my position.

- ☐ I understand that my failure 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 Standards of Conduct, the Compliance Program and DePaul's policies and procedures; improper acts in the delivery or billing of services; and other wrongdoing (collectively referred to as "compliance concerns") may result in disciplinary action, up to and including termination of employment, contract, assignment or engagement with DePaul.

By placing a checkmark in the boxes above, I acknowledge that I have read and understand each statement.

Signature _____

Print Name _____

Title _____

Date _____