

 <p>new directions YOUTH AND FAMILY SERVICES</p> <p><u>GENERAL POLICY</u></p>	Number: <input type="text" value="10.02"/>
	Section: <input type="text" value="Corporate Integrity"/>
	Title: <input type="text" value="Code of Conduct"/>
	Applicable Standards <input type="text"/>
	Adoption Date <input type="text" value="1/2021"/>
	Last Revision <input type="text"/>

The New Directions’ (“NDYFS”) Code of Conduct is a part of the NDYFS Corporate Compliance Plan, a set of formal organizational systems which are intended to prevent, detect and correct payment and billing mistakes, fraud, waste and abuse in compliance with Federal and State laws/regulations including, but not limited to:

- Federal and New York State False Claims Act
- New York State Social Service Law Section 363-d and
- Title 18 NYCRR-Part 521

New Directions demonstrates its commitment to the display of honest, ethical behavior in all interactions while carrying out its mission according to its Code of Conduct and NDYFS policies

Activities Applicable Under this Code of Conduct

All directors, officers, key persons, employees, contractors, and volunteers/interns shall display honest, ethical conduct while carrying out their role to fulfill the activities outlined below:

1. Billing
2. Payment
3. Medical necessity and quality of care
4. Governance
5. Mandatory reporting,
6. Credentialing
7. Other risk areas that are, or should, with due diligence be identified

For purposes of this policy, a key person shall have the meaning provided in New York Not-For-Profit Corporation Law Section 102(a) (25), which is the following:

Any person, other than a director or officer, whether or not an employee of New Directions Youth and Family Services, Inc. who (i) has responsibilities, or exercises powers or influence over New Directions Youth and Family Services, Inc. as a whole similar to the responsibilities, powers, or influence of directors and officers; (ii)

 <p>new directions YOUTH AND FAMILY SERVICES</p> <p><u>GENERAL POLICY</u></p>	Number: <input type="text" value="10.02"/>
	Section: <input type="text" value="Corporate Integrity"/>
	Title: <input type="text" value="Code of Conduct"/>
	Applicable Standards <input type="text"/>
	Adoption Date <input type="text" value="1/2021"/>
	Last Revision <input type="text"/>

manages New Directions Youth and Family Services, Inc., or a segment of New Directions Youth and Family Services, Inc. that represents a substantial portion of the activities, assets, income or expenses of New Directions Youth and Family Services, Inc.; or (iii) alone or with others controls or determines a substantial portion of New Directions Youth and Family Services, Inc.'s capital expenditures or operating budget.

Duty to Report

All directors, officers, key persons employees, contractors, volunteers/interns of NDYFS must report any known or possible violation of this Code of Conduct, NDYFS Code of Ethics, NDYFS policies or federal, state local laws/regulations in accordance with reporting methods outlined in this Code of Conduct.. Any conduct that a reasonable person would in good faith believe to be erroneous, wasteful or fraudulent must be reported in accordance with the reporting methods outlined in this Code of Conduct.

Examples of potential reportable compliance concerns may include:

Documentation claiming entitlement to payment for services rendered that is submitted in error or fraudulently; as may be found in a progress note, client attendance record, or billing code.

Employee entitlement to payment that is claimed in error or fraudulently as in a time sheet, invoice, reimbursement request or a check request.

Those who fail to report any known or possible violation of this Code of Conduct, NDYFS Code of Ethics, NDYFS policies or federal, state, local laws or regulations, participate in non-compliant behavior, and/or encourage, direct, facilitate or permit non-compliant behavior will be subject to the responses outlined below for misconduct as a result of an investigation.

Non-Intimidation and Non-Retaliation

Consistent with NDYFS' Non-Intimidation and Non-Retaliation Policy, no director, officer, key person, employee, contractor, or volunteer/intern of NDYFS who is good faith reports any action or suspected action taken by or within NDYFS that is illegal, fraudulent,

 <p><u>GENERAL POLICY</u></p>	Number: <input type="text" value="10.02"/>
	Section: <input type="text" value="Corporate Integrity"/>
	Title: <input type="text" value="Code of Conduct"/>
	Applicable Standards <input type="text"/>
	Adoption Date <input type="text" value="1/2021"/>
	Last Revision <input type="text"/>

or in violation of law (e.g. including, but no limited to the New York False Claims Act) or of any adopted policy of NDYFS shall suffer intimidation, harassment, discrimination or other retaliation or, in the case of employees, an adverse employment consequence. However, reports made in bad faith by employees may result in disciplinary action up to and including termination.

Investigation

Reports of any known or possible violation of this Code of Conduct, NDYFS Code of Ethics, NDYFS policies or federal, state, local laws or regulations will be investigated by the Compliance Officer according to the NDYFS Investigation and Resolution of Compliance Concerns Policy.

Communications connected to the report will be kept confidential to the degree possible while conducting the investigation.

All directors, officers, key persons, employees, contractors and volunteers/interns of NDYFS are expected to cooperate fully in an investigation of a report of a known or possible violation of this Code of Conduct, NDYFS Code of Ethics, NDYFS policies or federal, state, local laws or regulations.

Misconduct or violation of this Code of Conduct, NDYFS Code of Ethics, NDYFS policies or federal, state, local laws or regulations will result in employee disciplinary action up to and including termination or, for other individuals, action according to the applicable handbook, agreement or NDYFS By-Laws.

Reporting Methods

Reports of any known or possible violation of this Code of Conduct, NDYFS Code of Ethics, GLW policies or federal, state, local laws or regulations must be made to the Corporate Compliance Officer through normal supervisory channels or as follows:

 <p>new directions YOUTH AND FAMILY SERVICES</p> <p><u>GENERAL POLICY</u></p>	<p>Number: <input type="text" value="10.02"/></p> <p>Section: <input type="text" value="Corporate Integrity"/></p> <p>Title: <input type="text" value="Code of Conduct"/></p> <p>Applicable Standards <input type="text"/></p> <p>Adoption Date <input type="text" value="1/2021"/></p> <p>Last Revision <input type="text"/></p>
--	---

*Corporate Compliance Officer, Eric Fitzpatrick (716-529-1240; efitzpatrick@newviewalliance.org).

*Board of Directors Audit and Compliance Committee Chair, Tracy Meyer; 716-400-4527).

*The Whistleblower Hotline (Please note that reports made using the Whistleblower Hotline may be made anonymously.)

- **Website:** www.lighthouse-services.com/newviewalliance
- **Anonymous Reporting App: Keyword: newviewalliance**
 - Detailed app instructions [here](#)
- **Toll-Free Telephone:**
 - **English speaking USA and Canada: 877-222-3139**
 - Spanish speaking USA and Canada: **800-216-1288**
 - Spanish speaking Mexico: **01-800-681-5340**
 - French speaking Canada: **855-725-0002**
 - Contact us if you need a toll-free # for North American callers speaking languages other than English, Spanish or French
- **E-mail:** reports@lighthouse-services.com (must include company name with report)
- **Fax:** 215-689-3885 (must include company name with report)