



STANDARDS OF CONDUCT

These Standards of Conduct are part of Jewish Home of Central New York, Inc., Menorah Park Group Residences, Inc., and Syracuse Jewish Family Services, Inc.'s (collectively, "Menorah Park" or the "Organization") Corporate Compliance Program.¹ These Standards of Conduct set forth the basic principles that guide the Organization's decisions and actions. All employees, contractors, and Board members² are expected to familiarize themselves with the Standards of Conduct and comply with the Standards in carrying out their duties.

The Standards of Conduct are not intended to address every potential compliance issue that may arise in the course of the Organization's business. Instead, these Standards of Conduct are intended to provide a framework for the Organization's Compliance Program, Compliance Plan, and applicable policies and procedures. Employees, contractors, and Board members should familiarize themselves with the Organization's Compliance Plan and Compliance Program, and should seek guidance from the Compliance Officer as needed.

Employees, contractors, and Board members are required to comply with the following responsibilities:

1. Comply With Applicable Laws.

All employees, contractors, and Board members must be aware of and comply with all applicable laws and regulations applicable to their functions. Employees, contractors, and Board members are obligated to know the following information, to the extent it is applicable to their daily responsibilities and/or the services provided to the Organization:

- a. Medicaid, Medicare, and other payer and service delivery requirements;

¹ The Corporate Compliance Program ("Compliance Program") is the Organization's implementation of its Corporate Compliance Plan ("Compliance Plan")—the document that provides an overview of the Organization's Compliance Program—and includes all of the Organization's compliance activities.

² For purposes of these Standards of Conduct, "employees, contractors, and Board members" includes the Organization's employees, Chief Executive Officer ("CEO"), senior administrators, managers, interns, volunteers, contractors, agents, subcontractors, independent contractors, Board, and corporate officers who are affected by the Organization's Compliance Risk Areas, as defined in Section XIII of the Organization's Compliance Plan. For purposes of the Organization's Compliance Program, Compliance Plan, and these Standards of Conduct, "contractors" includes contractors, agents, subcontractors, and independent contractors who are affected by the Organization's Compliance Risk Areas, as defined in Section XIII of the Organization's Compliance Plan. Contractors are required to comply with the Organization's Compliance Program to the extent that the contractor is affected by the Organization's Compliance Risk Areas, and only within the scope of the contractor's contracted authority and affected Compliance Risk Areas.

- b. The prohibitions against fraud, waste, abuse, and improper or unethical conduct;
- c. The Organization's Compliance Risk Areas, as defined in Section XIII of the Organization's Compliance Plan; and
- d. The Organization's Compliance Plan and Compliance Program, including applicable policies and procedures.

Employees, contractors, and Board members are also required to comply with the Organization's Compliance Program policies and procedures, including the **Exclusion Screening Policy**, **Vendor Relations Policy**, and **Fraud Prevention Policy**. Employees, contractors, and Board members are obligated to attend initial, annual, and other periodic compliance training and education, and to review and certify adherence to the Compliance Plan and Standards of Conduct. See **Compliance Training Policy**.

2. Duty to Report.

Employees, contractors, and Board members are obligated to report instances of actual or possible fraud, waste, abuse, other improper or unethical conduct, violations of Federal or State laws, rules, regulations, policies, and standards, and the Organization's Compliance Plan, Compliance Program policies and procedures, and Standards of Conduct. Employees, contractors, and Board members must report actual or suspected violations of the Compliance Standards³ to one (1) of the following:

- a. The Organization's Compliance Hotline (315-446-9111 ext. 421) (anonymously or otherwise);
- b. The Organization's Compliance Officer, Sarah Grigorita, by phone (315-446-9111 ext. 133) or email (sgrigoirta@menorahparkofcny.com);
- c. The Organization's Compliance Officer, Sarah Grigorita, in writing by mail to "Attn: Compliance Officer, Menorah Park of CNY, 4101 E Genesee St, Syracuse, NY 13214" (anonymously or otherwise);
- d. The Compliance Dropbox located at the Human Resources office; or
- e. To a supervisor, any member of the Compliance Committee or Board, or the Organization's CEO.

Employees, contractors, and Board members are encouraged to first report their concerns directly to the Organization to allow the Organization the opportunity to quickly address potential problems. Employees, contractors, and Board members can find more information on their duty to report in the Organization's **Duty to Report Policy** and **Fraud Prevention Policy**.

³ "Compliance Standards" include applicable Federal and State laws, rules, regulations, policies, and standards, and the Organization's Compliance Plan, Compliance Program, policies, procedures, and Standards of Conduct.

3. Duty to Respond and Cooperate.

Employees, contractors, and Board members are obligated to respond appropriately to reports of actual or possible violations of the Organization's Compliance Standards that are reported to them by other employees, contractors, and Board members. Responding to these reports should include following the procedure set forth in the Organization's **Compliance Investigations Policy**. Board members are also responsible for ensuring that the Organization follows the procedures set forth in the **Compliance Investigations Policy**. Employees, contractors, and Board members are also required to cooperate in internal and external audits and investigations by duly authorized internal or external auditors or investigators regarding actual or potential violations of the Organization's compliance standards.

4. Promote Organizational Compliance.

Employees, contractors, and Board members shall promote and demonstrate their commitment to compliance with Medicaid, Medicare, and other payer and service delivery requirements, and the prohibitions against fraud, waste, and abuse and other improper or unethical conduct. Employees shall also cooperate with and assist the Compliance Officer in the performance of their responsibilities, and Board members shall receive quarterly updates and reports from the Compliance Officer on compliance-related initiatives and activities.

5. Conduct Affairs in Accordance With High Ethical Standards.

All employees, contractors, and Board members shall conduct themselves in accordance with high ethical standards of the community and their respective professions.

6. Conflicts of Interest.

All employees, contractors, and Board members must faithfully conduct their duties in their assigned roles solely for the purpose, benefit, and interest of the Organization and those it serves. All employees, contractors, and Board members have a duty to avoid conflicts with the interests of the Organization and may not use their positions and affiliations with the Organization for personal benefit. Employees, contractors, and Board members must avoid not only actual conflicts but also the appearance of conflicts of interest.

7. Provide High Quality of Care.

All employees and contractors are expected to provide high quality services and Board members shall support this standard of care. The care provided must be reasonable and necessary to the care of each individual and be provided by properly qualified individuals.

8. Provide Equal Opportunity and Respect the Dignity of All Recipients.

The Organization is committed to providing services for persons, without regard to age, race, color, national origin, ethnicity, religion, handicap, gender, gender identity, gender expression, sexual orientation, human research subject, or source of payment. All employees, contractors, and Board members shall treat all individuals served and employees with respect and dignity. Discrimination in any form will not be tolerated.

9. Confidentiality.

Employees, contractors, and Board members have access to a variety of sensitive and proprietary information of the Organization, the confidentiality of which must be protected. All such persons must adhere to the appropriate laws, regulations, policies, and procedures to ensure that confidential and proprietary information is properly maintained and that inappropriate or unauthorized release is prevented. In addition, employees, contractors, and Board members must refrain from sharing proprietary Organization information with third parties unless sharing such information is authorized.

10. Integrity with Payer Sources.

Employees and contractors shall ensure that: all requests for payment for services are reasonable, necessary and appropriate; issued by properly qualified persons; and billed in the correct amount with appropriate supporting documentation.

11. Honesty and Integrity.

All business practices must be conducted with honesty and integrity and in a manner that promotes a positive and professional reputation with residents, patients, individuals served, volunteers, payers, vendors, regulatory agencies, other providers, and the public. Employees, contractors, and Board members must be honest and truthful in all of their dealings, and must avoid doing anything that is, or might be, against the law.

12. Dignity and Respect.

Employees, contractors, and Board members shall respect and value each other, the diversity of the Organization's work force, the individuals the Organization serves, the environment in which members of the Organization work, and the resources that the Organization uses.

Adopted: March 17, 2023

Amended: 12/11/2023