

## **AEI CODE OF ETHICS & CORPORATE COMPLIANCE PLAN**

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### **AEI CODE OF ETHICS AND CORPORATE COMPLIANCE PLAN**

Ethics are a set of values and beliefs. Ethical practices mean working and providing care with methods that are honest, legal and respectful of others; and reflect the mission and values of AEI.

#### **QUALITY IMPROVEMENT**

AEI is committed to continuously evaluate and improve our services to provide the highest degree of quality possible. Improving quality through all levels of the organization is a fundamental belief of AEI which is achieved by both internal and external evaluative processes.

#### **ACCESSIBILITY**

AEI is committed to not only providing fully accessible program supports in its facilities, but also to breaking down barriers that prohibit or limit our individuals access to their communities. AEI's Accessibility Committee monitors organization performance in meeting its accessibility obligations, and annually makes recommendations to AEI's Board through its Accessibility Plan.

#### **CORPORATE COMPLIANCE**

Corporate Compliance means abiding by the law and following AEI policies and procedures which are designed to encourage ethical behavior. The purpose of Corporate Compliance is to help prevent fraud, abuse, and other unethical practices; and to ensure all employees and business partners strive to meet the highest standards of ethical conduct.

#### **CORPORATE COMPLIANCE OFFICER (CCO)**

The CCO is the individual who assists in ensuring that the policies of the organization are carried out properly. Reports regarding incidents of suspected corporate fraud and abuse are to be made directly to the CCO. These reports may be made openly or anonymously; and will not result in retaliation by the organization. Although every effort will be made to maintain the confidentiality regarding the identity of the person submitting the report, there may become a point in certain instances where that individual's identity may need to be revealed. An investigation will be conducted based on all reports, and disciplinary action may be applied to individuals for whom fraud and/or abuse is substantiated.

**The Attleboro Enterprises, Inc. CCO is:**  
Debra Meringolo, Director of Administration  
Phone (508) 695-4046 ext. 112  
Fax (508) 695-4080  
Email: [dmeringolo@attleboroenterprises.org](mailto:dmeringolo@attleboroenterprises.org)

#### **BUSINESS PRACTICES**

AEI staff that are involved with billing practices and other business/administrative functions are also expected to uphold certain ethical principles. Unethical business practices may include, but are not limited to:

##### **Unlawful billing practices:**

- Duplicate billing, or billing more than one claim for the same service.
- Up coding or using a billing code that give higher payment rather than the billing code that appropriately reflects the actual services provide.

**False claims:**

- Filing claims for services that were not provided.
- Filing claims for services that are not clinically necessary.

**Kickbacks:**

An employee or employees, their families and relatives are prohibited from, but not limited to:

- Accepting cash, products, services or other type of benefit as a result of favorably pricing the services of AEI programs and/or program participants.
- Accepting any form of benefit from a vendor that may be construed to have been received as a result of a decision to purchase products or services from that vendor.

**Filing Unnecessary Claims with Medicaid or Medicare:**

- One of the reasons for developing a CCP is to prevent Medicaid and Medicare fraud. It is illegal to bill Medicaid and Medicare for services that are not reasonable and/or clinically necessary.

**Business Records and Cost Reports:**

- All records are to be kept up to date. Never falsify or alter business records or cost /mileage reports.

The practices described above are considered unethical and illegal. If you are aware of any wrong doing in this area, it is then your responsibility to report it immediately. Disciplinary action up to suspension and/or including termination may be issued to staff that engage in illegal billing services, or corporate fraud or abuse as outlined above.

## **INTERNAL EVALUATION PROCESS**

On a quarterly basis, AEI's CCO or designate will conduct a random testing of the organization's attendance and billing procedures to ensure compliance with this Plan's Business Practices.

## **BOARD OF DIRECTORS CODE OF ETHICS**

The Board of Directors of Attleboro Enterprises, Inc. (AEI) acts with consistency, openness, and honesty in all they do. The Board keeps faith with the public trust through the highest standards of stewardship. Accordingly, Board members:

1. Must conduct themselves without conflicted loyalty to the interests of AEI and its stakeholders.
2. Must not breach their fiduciary responsibility to AEI and must avoid conflict of interest with respect to the following:
  - a. There must be no self-dealing, nor any private business activity, nor personal services between any Board member and the organization except as consistent with applicable law to assure openness, competitive opportunity, and equal access to information.
  - b. When the Board or a Committee is to decide upon an issue in which a Director has an unavoidable conflict of interest, that Director shall excuse himself or herself without comment, from the entire deliberation and voting.
  - c. Directors must not use their position to obtain AEI employment for themselves, family members, or close associates. Should a Director desire such an employment offer, she or he must first resign from the position of Director.
  - d. Directors will annually disclose their involvement with other organizations, vendors, or any other associations that might produce a potential conflict with this policy.

3. May not attempt to exercise individual authority over the organization, except as explicitly set forth in Board or Committee policies.
  - a. Interaction with the CEO or AEI staff must recognize the lack of Director authority except when explicitly Board or Committee authorized.
  - b. Interactions with public, press, or other entities must recognize the same lack of individual authority and the inability of any Director to speak for the Board except to repeat explicitly stated Board decisions.
  - c. Directors will give no consequence or voice to individual judgments of the CEO or staff performance, except as part of the performance evaluation.
4. Will respect the confidentiality concerning Board issues and information of a sensitive nature.
5. Will annually acknowledge compliance with this policy by completing an appropriate consent form provided by executive staff.
6. Violations of the Code of Ethics will be addressed by the Board of Directors on a case by case basis.

## **CODE OF ETHICS FOR EMPLOYEES, CONSULTANTS AND VOLUNTEERS**

Attleboro Enterprises, Inc. (AEI) employees, consultants, and volunteers are expected to carry out the Mission and Principles of the organization. Accordingly; it is expected that all staff, consultants and volunteers will exercise good ethical judgment in all their interactions with persons served, their families/guardians, colleagues, and members of the public.

The guidance and standards included in this document are not meant to be all inclusive. These ethical standards are broken down into four general categories:

### **1. Responsibility to Program Participants**

Encompasses respecting an individual's right to self-determination, autonomy and confidentiality as well as the values of non-discrimination and fairness. Above all, it means not engaging in activities that may cause physical, mental, emotional, or other psychological damage to individuals.

- a. Our primary obligation is to respect the integrity and welfare of the people we serve. Our actions are designed to support and enhance their level of responsibility and self-determination. We are also responsible for taking reasonable precautions to protect individuals from physical and/or psychological harm.
- b. We afford equal opportunity to all individuals regardless of race, color, sexual preference, creed, religion, gender, age, national origin, or disability in conformance with applicable laws and regulations.
- c. We protect the confidentiality and dignity of individuals served.
- d. We avoid engaging in dual relationships with persons served that may compromise those services. Examples of dual relationships include, but are not limited to:
  - Sexual involvement with a program participant.
  - 1) Entering into a business or financial arrangement with a program participant.
- e. We recognize the right of individuals to receive the highest quality of services.
- f. We refrain from imposing our personal values and religious or political beliefs on individuals.

- g. We recognize the importance of our relationships with people we support and maintain an appropriate respect for them. We avoid engaging in activities that seek to meet our personal needs at the expense of people we serve.
- h. When an individual's condition indicates that there is a clear and imminent danger to the individual or others, we must take reasonable personal action or inform responsible authorities.

## **2. Professional Responsibility and Competence**

Addresses the need to maintain the knowledge, skills and judgment to ensure high levels of professional competence in the performance of our duties and responsibilities.

- a. We encourage staff to seek assistance for their own problems and/or conflicts that may impair their work performance and/or judgment when working with program participants and colleagues.
- b. We understand that we are required to speak up and seek direction or consultation from our supervisor if we have questions about what is the proper and ethical conduct in a particular circumstance.
- c. We promote continuous professional growth on the part of our staff to improve our level of high quality services delivery.
- d. We have a responsibility both to the individuals we serve and our organization to maintain the highest standards of professional conduct.
- e. We dedicate our full working time to our program participants and our organizational responsibilities.
- f. We confine our services to the limits of our demonstrable expertise. We employ only those supports and techniques for which we are qualified by education, training or experience. We neither claim nor imply professional qualifications that exceed those that we possess. We also correct any misrepresentation of these qualifications by others.

## **3. Integrity in Professional Relationships**

Requires that we as staff be honest and direct, respect and understand others, and work in full cooperation with others to meet the needs of people we serve. Integrity can accommodate the inadvertent error and the honest difference of opinion. It cannot accommodate deceit or subordination of principle.

- a. We comply with the Mission and Values of AEI.
- b. Ethical behavior between our colleagues and ourselves is expected at all times. When information is possessed that raises doubt as to the ethical behavior of a colleague, we are required to take action to rectify the condition.
- c. We neither give nor receive any form of remuneration for referral of program participants for professional services.
- d. We treat co-workers in an open-minded manner that demonstrates respect for their worth and ideas, embraces cultural diversity and recognizes their achievements and abilities.
- e. We do not harass, demean, or discriminate against persons with whom we interact in the workplace. We conduct ourselves professionally at all times and refrain from abusive, offensive or foul language.

## **4. Responsibility to Society and the Public Trust**

Public trust and responsibility to society obligates us to moral and professional excellence and integrity, to contribute to the knowledge base of the field in order to improve services, and to promote human welfare.

- a. We comply with all applicable federal, state, and local codes and laws that affect our services and AEI.
- b. We safeguard the reputation of AEI and work to enhance the community's perception of our organization and staff through well-considered public statements, opinions, or positions.
- c. We conduct our programs, services, and activities with such personal honesty and integrity as to place AEI above reproach morally, legally, and ethically.

## **5. Witnessing of Documents:**

Staff Members shall not act as a witness to documents such as Power of Attorney, guardianship, advance directives, and/or agency contracts without the expressed written approval of the CEO. Staff Members are authorized to countersign documents such as intake forms, authorizations (i.e., release of information form, treatment plans, etc. as directly related to their job duties.

## **MARKETING CODE OF ETHICS**

In all of its marketing activities, Attleboro Enterprises, Incorporated (AEI) shall respect the rights, dignity and confidentiality of individuals it supports in its programs.

AEI marketing shall be conducted in a manner that maintains public trust. AEI shall never knowingly misinform the public or misrepresent information made available to the public about the organization.

AEI marketing activities shall be conducted with the utmost integrity so as to merit the continued support and trust of the public.

## **FUNDRAISING CODE OF ETHICS**

In all its fundraising activities, Attleboro Enterprises, Incorporated (AEI) shall ensure it merits the respect and trust of its donors.

AEI declares that all donors have these rights:

- To be informed of AEI's Mission, of the way AEI intends to use donated resources, and of its capacity to use donations effectively for their intended purposes.
- To be informed of the identity of those serving on AEI's Board of Directors, and to expect the Board to exercise prudent judgment in its stewardship responsibilities.
- To have access to AEI's most recent financial statements.
- To be assured their gifts will be used for the purposes for which they were given.
- To receive appropriate acknowledgement and recognition.
- To be assured that information about their donations is handled with respect and with confidentiality to the extent provided by law.
- To expect that all relationships with individuals representing organizations of interest to the donor will be professional in nature.
- To be informed whether those seeking donations are volunteers, employees of AEI or hired solicitors.
- To have the opportunity for their names to be deleted from mailing lists that AEI may intend to share.

- To feel free to ask questions when making a donation and to receive prompt, truthful and forthright answers.

## **EMPLOYEE RIGHTS AND RESPONSIBILITIES**

AEI staff have the right to receive education and training regarding their responsibility to comply with this Corporate Compliance Plan (CCP), and reporting procedures for violation of the CCP.

### **The AEI CCO is**

Debra Meringolo, Director of Administration

Phone (508) 695-4046 ext 112

Fax (508) 695-4080

Reporting Email: [info@attleboroenterprises.org](mailto:info@attleboroenterprises.org)

### **If you suspect violations of Corporate Compliance:**

Contact the CCO. Reports may be made verbally over the phone or by voicemail. Written reports can be submitted by fax, mail or email. In all reporting please provide as much specific information as possible, including names of involved individuals, dates and times, and an objective description of the suspected waste or fraud.

If the CCO is involved in the suspected fraud or abuse, a report may be made to Gerard Pilkington, President at (508) 695-4046 ext.114.

AEI honors a no reprisal system for abuse reporting. Making a report will not result in disciplinary action if you have complied with AEI's Corporate Code of Ethics.

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