

**Code of Business Ethics and Conduct**

**Mission**

The mission of United Cerebral Palsy of Central Pennsylvania, Inc. is to assist infants, children, youth, and adults, with disabilities, and their families, achieve their goals of development, growth, independence, and full citizenship.

**Vision**

Our vision is that all persons in the community, regardless of ability or disability, have an equitable opportunity to fully participate in all facets of community life, in accord with their personal needs and interests.

**Values**

The consumer always comes first. Services are individually designed to meet each person’s wants and needs. There is unconditional respect for individual rights and dignity and a commitment to optimal outcomes for each person. Each person served experiences some joy and success each day.

**Purpose**

The Code of Business Ethics and Conduct was developed to define a set of ethical principles to be used to guide decision-making and actions for UCP Central PA employees, consultants and business associates that incorporates our mission, vision and values. The Code of Conduct establishes a framework for professional behavior and responsibilities when professional obligations conflict or ethical uncertainties arise and it also provides principles that consumers and the general public can use to hold UCP Central PA responsible.

No single code can cover all possible scenarios and does not take the place of personal character, integrity and the use of sound judgment. Employees of UCP Central Pa and it subsidiaries, volunteers, contractors and members of the Board of Directors are expected to be knowledgeable of and adhere to the spirit of UCP’s Business Ethics and Code of Conduct as well as the specific standards and guidelines outlined in this document.

**Business Ethics and Conduct**

The successful business operation and reputation of UCP of Central Pennsylvania is built upon the principles of fair dealing and ethical conduct of our employees. Our reputation for integrity and excellence requires careful observance of the spirit and the letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity.

The Continued success of UCP Central PA is dependent upon our consumer’s trust and we are dedicated to preserving that trust. Employees are obligated to UCP Central PA and its consumer to act in a way that will merit the continued trust and confidence of the public.

UCP Central PA will comply with all applicable laws and regulations, and expects its directors, officers, and employees to conduct business in accordance with the letter, spirit and intent of all relevant laws and to refrain from any illegal, dishonest, or unethical conduct.

In general the use of good judgment, based on high ethical principles, will guide the employee with respect to lines of acceptable conduct. If a situation arises where it is difficult to determine the proper course of action, the matter should be discussed openly with your immediate supervisor for advice and consultation. Any issues of suspected fraud and abuse should be elevated to the attention of the Corporate Compliance Officer and/or Management at UCP Central PA. Additional reporting guidelines can be found in the Compliance Plan.

Compliance with the Code of Business Ethics and Conduct is the responsibility of every UCP Central Pa employee. Employees are required to report under a criminal statute for violations occurring on or off the premises, or while conducting business. Disregarding or failing to comply with this standard Code of Business Ethics and Conduct can lead to disciplinary action (Personnel policies – IV management practices – C disciplinary procedure) up to and including termination.

**General Ethical Practice and Standards Guidelines**

* Adhere to the ethical business principles and practices.
* Practice professional behaviors that demonstrate honesty, integrity, and accountability.
* Maintain a level of competency as outlined in the Standards of Practice applicable to your specific profession/practice area.
* Seek the trust and confidence of all consumers.
* Respect all laws and avoid involvement in any false, fraudulent, or deceptive activity.
* Promote the right of privacy for all consumers and protect the maintenance of confidential information to the fullest extent permitted by law.
* Avoid conflict of interest situations.

**Adhering to Laws and Regulations**

Employees of UCP Central PA are required to obtain FBI, state criminal and child abuse checks as a requirement for employment. Falsification on any clearance applications and/or an UCP Central PA employment application are considered violations of law and regulations. Fraudulent time keeping practices (including making unauthorized altercations on a time and attendance record) are also considered violations or law and regulations.

**Billing**

UCP Central PA practices sound fiscal and business practices to ensure the accuracy and integrity of the data collected for billing and other operational needs. Program Managers and Supervisors are required to verify: that consumers are authorized to receive services that the services rendered are accurate and valid, and that appropriate documentation substantiating the services rendered has occurred within the required timeframes. UCP Central PA utilizes internal auditing and monitoring practices and detailed internal Financial and Personnel policies and procedures to establish valid and accurate claims are submitted for payment.

**Fraud and Abuse**

Examples of fraud and abuse are: falsifying or altering claims or records, up coding or incorrect coding, double billing, billing, billing for services that were not rendered or authorized, failing to maintain appropriate documentation/records of services, any issues or actions resulting in overpayment, embezzlement, theft, failure to return fund not authorized, falsifying time sheets and or any other actions that caused the submission of a false claim ( the submission of a claim for payment which the provider is not otherwise entitled to receive)

Any employee, contractor, and business associate that suspects fraud, waste and/or abuse should report it to the Corporate Compliance Officer directly at **717-737-3477**, via the Compliance Hotline at **1-877-410-9091** or the Compliance email at: **Compliance@ucpcentralpa.org**. The Corporate Compliance Officer will conduct an investigation into the issue reported. The person making the report can do so directly or anonymously. UCP Central PA follows a Whistleblower Protection Policy and holds the CEO, Board of Directors, Program Directors, and Department Supervisors, all employees, contractors and business associates responsible for maintaining a safe working environment free from retaliation for reporting suspicious or fraudulent concerns. Anyone found retaliating against a person reporting fraud, waste or abuse will be disciplined in accordance with UCP Central PA’s Discipline Procedure Policy. Any reported allegations of retaliation will be investigated by the Corporate Compliance Officer and any additional Senior Level Director as applicable.

The Code of Conduct is a part UCP’s complete Compliance Program and practices. If any questions arise concerning the Business Ethics and Code of Conduct, or you would like to report a violation, you can make a confidential report to the compliance helpline at: **1 -877-410-9091** or make a confidential report online at: **Compliance@ucpcentalpa.org**

Reports can also be made directly to the Compliance Officer, your immediate supervisor or any member of Senior Management.

**“Code of Ethics and Business Conduct” Acknowledgement Form**

I acknowledge that I have received and reviewed UCP Central PA’s Code of Ethics and Business Conduct. I agree to comply with the standards contained in the code and all related policies and procedures as is expected as part of my continued employment or association with the organization. I acknowledge that the code is only a statement of principles for individual and business conduct, and does not constitute an employment contract. I will report any potential violation of which I become aware promptly to my supervisor or the compliance officer. I understand that any violation of the Code of Ethics and Business Conduct or any corporate compliance policy or procedures is grounds for disciplinary action, up to and including discharge from employment.

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**Name (Please print)**

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**Signature Date**

**Compliance Training Acknowledgement Form**

I acknowledge that I participated in UCP Central PA’s Compliance training and received information about the following information:

False Claims Act

Penalties and fines associated with violation of the False Claims Act

UCP Central PA’s Corporate Compliance Program

Code of Ethics and Business Conduct

My signature confirms my receipt of this information and copies of the Code of Ethics and Business Conduct and Quality Management Plan.

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Printed Name

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Signature Date