



Code of Conduct for Contractors and Vendors

Liberty ARC requires all members of the Liberty ARC community, including its contractors, agents, and vendors, to conform to the highest ethical standards and to meet or exceed their legal obligations in the performance of their efforts on behalf of Liberty ARC.

To assist us in communicating our values and our expectations, we have developed this Code of Conduct for Businesses and Vendors (hereafter, the Code), which we consider to be a material part of every transaction or agreement with every contractor and vendor of goods and/or services.

1. We are committed to compliance with the law.

Liberty ARC is committed to conducting its programs and services in a lawful and ethical manner, in full compliance with all federal, state and local laws and regulations. We expect all contractors and vendors to comply with the law and all regulations at every step of the relationship with Liberty ARC, including preparing bids or proposals, obtaining or having the necessary credentials for the work to be performed, and the performance of the work.

No claims for payment or reimbursement of any kind that are false, fraudulent, inaccurate or fictitious may be submitted. No falsification of medical, time or other records that are used for the basis of submitting claims will be tolerated.

2. We are committed to hire and contract with qualified people and entities.

Liberty ARC will only hire or contract with people or entities with proper credentials, experience and expertise. As part of the hiring/contracting process, Liberty ARC will check credentials and references to be sure that contractor qualifications are as represented. Liberty ARC will require proof of, and will independently verify, licenses or certifications from all persons or entities that are required to have some form of license or certification, or who represent that they have some license or certification in the course of contracting to perform services or provide goods to, or on behalf of, Liberty ARC. All contractors and vendors will be screened to insure that they have not been excluded from participation in federal or state programs that are funded with public funds.

3. We are committed to integrity in the process for awarding contracts and work.

Liberty ARC is committed to a process for awarding contracts that assures that Liberty ARC receives the best value for its dollar. This means that all elements of a transaction will be set forth in the contract or agreement. Gifts to employees, "kickbacks", side agreements, or any other transaction or arrangement that might influence an employee to recommend one contractor or vendor over another for personal reasons or personal gain, are strictly prohibited.

Liberty ARC shall not pay any entity (employees, physicians, other health care professionals, or other contractors) directly or indirectly, for referrals of patients or people. Every payment to a contractor or vendor who might be a source of referrals shall be for market value for the goods and/or services provided and shall be supported by proper documentation that the goods and/or services contracted for were in fact provided.

4. We are committed to honesty and accuracy in all documentation.

Liberty ARC is committed to honesty and accuracy in the documentation of all aspects of its operations, from time records, service notes, and requests for payment to consumer plans and billing documentation. Contractors, vendors and employees are expected to be honest and accurate in all documentation that is provided or submitted for any purpose. Employees or agents who perform billing and/or coding of claims must take every reasonable precaution to ensure that their work is accurate, timely, and in compliance with federal and state laws and regulations and Liberty ARC's policies.

Liberty ARC will only bill or pay for services that are actually rendered and fully documented as required by regulation, rule, law or contract.

5. We are committed to avoiding improper conflicts of interest.

Liberty ARC is committed to avoiding conflicts of interest where possible and, where conflicts might exist, to handling those situations in a manner that is fully transparent and that assures that any possible conflict does not improperly influence any transaction, decision, agreement or arrangement.

A conflict of interest exists where an individual at Liberty ARC with decision-making authority has some outside relationship, contract or agreement with an individual or entity that might benefit from decisions by Liberty ARC. An improper conflict of interest exists where that relationship is not disclosed, or where Liberty ARC is not provided with enough information about the relationship to allow decision-making to proceed without any improper influence. Contractors and vendors are expected to disclose any relationships between themselves and Liberty ARC, or any officers, directors or employees of Liberty ARC that might constitute a conflict of interest.

6. We are committed to a workplace and service environment free from harassment or discrimination. Liberty ARC is committed to establishing and maintaining a workplace that is free from harassment or discrimination based on sex, race, ethnicity, disability, religious preference or sexual preference. We expect our contractors and vendors to respect this commitment and we require that our contractors refrain from any conduct that would violate these policies, whether directed at their own employees, Liberty ARC employees or people, or anyone else, while performing services at Liberty ARC's locations, or while acting on behalf of Liberty ARC in the community.

7. We are committed to establishing and maintaining a "culture of compliance."

Liberty ARC has made a comprehensive commitment to insuring that all employees, volunteers, contractors, suppliers and vendors understand and assist the agency in establishing and maintaining a culture of compliance. Some of the steps taken by Liberty ARC are:

- the adoption of a Code of Conduct for employees and Corporate Compliance Policies;
- the appointment of a corporate compliance officer who reports to the Corporate Compliance Committee of the Board of Directors;
- the institution of a comprehensive plan of compliance audits, along with a policy of correcting any errors, disciplining employees, and disclosing adverse results that are indicative of systematic wrong-doing to the appropriate governmental agencies;
- the establishment of a corporate compliance helpline, so employees may notify the Corporate Compliance officer of any issues that violate these policies, or that may be of concern;
- the implementation of a comprehensive training program for all employees, as well as for contractors and others doing business with Liberty ARC;
- the implementation of a well-publicized policy of non-retaliation and non-intimidation for "whistleblowers" or employees who identify misconduct by other employees, or who in good faith raise questions about conduct that maybe misconduct.

Liberty ARC expects its contractors and vendors to participate in this on-going effort by following this code of conduct; by complying with all rules, regulations and laws in the course of providing goods or services to Liberty ARC, and by identifying to Liberty ARC's corporate compliance officer any employees, or any activity at Liberty ARC, that they believe may be improper, unethical or illegal. It is not acceptable for contractors and vendors to willfully ignore conduct by anyone at Liberty ARC that may violate these policies and the underlying ethical principles.

Contractors and vendors have full access to Liberty ARC's Compliance Helpline, and are expected to use it if any person or program engages in conduct that is, or might be in violation of these principles. The same policy of non-retaliation and non-intimidation that applies to employees also applies to contractors or vendors who make complaints or raise issues in good faith.

43 Liberty Drive, Amsterdam, NY 12010
www.libertyarc.org

