



CODE OF CONDUCT

The Code of Conduct is the cornerstone of
AIM's Compliance Program.

An ethical, honest workplace begins with you!

Do The Right Thing.

Our Mission

AIM Services, Inc. is dedicated to supporting the "power of potential" in people of diverse abilities. Through community based services, advocacy, and education, dedicated professionals focus on supporting people in achieving their personal goals, while promoting a sense of self-confidence and independence.

Dear Employees,

You are about to read a very important document. AIM Services, Inc.'s Code of Conduct portrays what we stand for and the way we conduct our services. It establishes guidelines for our conduct and our behavior. It speaks of our commitment to work ethics, honesty and integrity in all we do. The Code of Conduct is the cornerstone of our Compliance Program and supports our Purpose, Values and Vision.

It is important to the success of the program that all employees take the Code of Conduct seriously. Please let us know if you are aware of any violations to the Code of Conduct, or any other concerns regarding your work environment.

June MacClelland, Senior Director & Chief Compliance Officer

We expect all employees to inform their Supervisor or Director of any potential concern or violation of the Code of Conduct. If you are uncomfortable going to one of them with your concern or you feel the issue has not been resolved, please call the Compliance Officer at (518) 450-2823 or call directly the

CONFIDENTIAL HOTLINE

(518) 450-2896

You may call this line anonymously.

Examples of violations may include, but are not limited to:

- Mistreatment of those receiving services
- Inappropriate conduct or language
- Confidentiality
- Conflicts of Interest

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I. INTRODUCTION

This Code of Conduct has been created in order to express how AIM complies with all state and federal laws and regulations. Today, a large number of laws, rules, regulations and guidelines affect all of our jobs. AIM is committed to do all things ethically and legally for everyone with whom we come in contact: the people we support, fellow employees, families, the community, and vendors. Following the Code of Conduct is a condition of employment with AIM Services.



II. STANDARDS OF CONDUCT

1. Confidentiality and Individual Services

In the course of their work, employees may have access to confidential information regarding the people we serve, family members, employees, etc. Such information must be protected in accordance with agency policies/procedures, Health Insurance Portability and Accountability Act (HIPAA) and other state, federal regulatory requirements. Employees will be held accountable for failure to adhere to agency/state/federal confidentiality policies and may be subject to civil liabilities by individuals/families, government or other agencies.

Protected health information is confidential, whether it is on paper, stored electronically, transmitted verbally, or observed.

2. Open and Honest Communication

AIM is dedicated to creating a workplace where you feel free to discuss concerns about any issue in a professional atmosphere. We should respect, support and respond to each other appropriately. If you need help regarding communication with your supervisor, please contact your Department Director or Human Resources Department at (518) 450-2890.



3. Dignity and Respect in the Workplace

Each employee must conduct him/herself in a manner that reflects the highest standard of professional ethical practice. Courtesy, confidentiality, kindness and cooperation, consistency, and objectivity are some of the attributes of the professional person.

In addition, AIM is an “equal opportunity employer.” We do not allow discrimination based on race, creed, color, religion, gender, national origin, age, disability, marital status or any other legal classification. AIM prohibits sexual harassment. Sexual harassment is:

- a) Offensive comments, jokes, indirect suggestions and other sexually oriented statements.
- b) Unwanted sexual advances, requests for sexual favors and all other verbal or physical conduct of a sexual nature, especially where it-
 - a. Becomes a term or condition of employment.
 - b. Is used to make decisions affecting someone’s job.
 - c. Creates an intimidating, hostile, or offensive work environment.

Example

I know an employee who is occasionally offended by the language and inappropriate humor his/her supervisor uses when speaking with employees. What should I advise the employee to do?

Advise the employee to tell his or her supervisor that he or she finds the language and humor offensive. If the employee is not satisfied with the results, then the employee should discuss the situation with the supervisor’s manager or the Human Resources Department at

4. Record Keeping

AIM maintains many types of records in both paper and electronic format. Please be aware that HIPAA must be followed at all times. This includes the following rules:

- Do not falsify facts or create false records
- Create only those records that are necessary to the performance of your function or job and those required by law
- Provide records only to those who have a legal “need to know”
- Preserve confidentiality
- Maintain records in accordance with AIM’s record retention policy
- Your documentation and signature must always be legible
- No misrepresentation of hours worked or services provided
- Only document services that YOU have provided. DO NOT document services others have provided

Example

My coworker forgot to document Res Hab data before the end of their shift. I observed them working on the goals with the individual. Can I complete the documentation?

No. Only staff that actually performed the service can complete the documentation.

5. Use of AIM Resources

Naturally, we all protect AIM's property and may not borrow AIM's property. Work time, facilities or equipment cannot be used for unapproved purposes. Any member of management should be able to help you if you have any questions concerning the appropriate use of property.

6. Workplace Safety and Health

We follow all health, safety and environmental laws and regulations. If you are unsure of the correct procedure to follow or you observe unsafe conditions, check with your supervisor or contact the Compliance Officer at (518) 450-2823 or the Compliance Hotline at (518) 450-2896.

7. "Intellectual Property"

"Intellectual Property" means copyrights, trademarks, patents and trade secrets. Some examples of potential concerns in this area may include:

- Installing computer software without proper license
- Copying printed materials for reasons other than limited to internal distribution or education

If you have questions about this subject, contact your supervisor or the Compliance Officer at (518) 450-2823 or the Compliance Hotline at (518) 450-2896.

8. Drug-Free Workplace

AIM Services, Inc. is committed to providing a safe work environment and to fostering the well-being and health of its employees. That commitment is jeopardized when any AIM employee uses illegal drugs or alcohol on the job, comes to work with these substances in his/her body, or possesses, distributes or sells drugs in the workplace. For these reasons, you may not illegally have distribute, sell or use drugs.

Each of us must maintain awareness that certain prescription drugs can also interfere with our ability to perform our duties and responsibilities appropriately and safely. If you have concerns that a prescription medication may impact your ability to fulfill your job responsibilities, please notify Human Resources at (518) 450-2890.

It is a condition of employment to submit to drug and/or alcohol testing when there is reasonable suspicion that an employee is using/under the influence of illegal drugs or alcohol on the job.

9. Relationships with Contractors, Vendors, etc.

In all our relationships with contractors or vendors, we must be careful we don't violate the law prohibiting direct or indirect financial incentives to purchase a vendor's product or service.

10. Illegal or Questionable Gifts

We exercise good judgment and discretion in accepting gifts. We never accept gifts, favors, services, entertainment or other things of value to the extent that acceptance influences decision-making.

11. Conflicts of Interest

AIM is a not-for-profit organization dedicated to the provision of Quality Services. Services and business activities are to be conducted objectively without being motivated by personal or financial gain.

Examples of conflicts of interest may include:

- Being employed by a Board member or entity in which we have financial interest
- Using AIM property to conduct your own business
- Accepting gifts or entertainment from another organization
- Competing either directly or indirectly with the services, product or plans offered by AIM
- Holding a financial interest in a company with which AIM does business

Possible conflicts of interest should be reported to your supervisor and the Compliance Office immediately upon discovery. Management and the Compliance Office can help determine if a conflict exists and will take whatever action is necessary to manage the conflict.

12. Provision of Quality Services

Quality services are provided with a positive approach.

Services are to be provided in accordance with each person's ISP, support plans, and per physician's orders as appropriate.

Services provided are driven by the person and what supports they want to achieve their personal valued outcomes and goals.

13. Mandated Reporter: Prevent - Stop - Report Mistreatment, Abuse or Neglect.

A individual's safety, meaning freedom from mistreatment, abuse or neglect in any form, must always be the primary concern of every employee. The employee, to the extent possible, must take reasonable and prudent measures to immediately protect individuals receiving services from harm and abuse and must ensure that a person receiving services who has been harmed receives any necessary treatment or care. Every employee is a mandatory reporter and must report any mistreatment, abuse or neglect immediately or as soon the circumstance allow for. Failure to report mistreatment, abuse or neglect may result in disciplinary action, up to and including termination. Contact your manager, and/or the manager, nurse or administrator on call. If you are not sure if it rises to the level of something reportable, ask your manager, director, or person on-call. Do not ignore the situation, take action.

13. Fraud and Abuse

AIM complies with all state and federal laws prohibiting fraud and abuse. For example, filing false or misleading claims for reimbursement would be subject to the False Claims Act. AIM is committed to assuring that all services are documented properly, and that billing is accurate, and that we arrange all financial and business relationships properly. AIM Services, Inc. complies with all false claims, acts, laws, rules and regulations; including whistleblowers and non-retaliation.

14. Political Activity and Lobbying

AIM is exempt from paying taxes because of our non-profit status. This means we cannot give AIM money,

property or services (including employee work time) to political parties or individuals running for public office. You may, of course, give your own money to political candidates and participate in political campaign activity on your own time as a private individual.

15. General Laws

We must all comply with all laws and rules affecting our jobs... not just the laws and rules mentioned here. When in doubt, ask for clarification from your supervisor or the Compliance Office at (518) 450-2823 or (518) 450-2896.

16. A Condition of Employment

Abiding by the Code of Conduct is a condition of your employment with AIM. Failure to meet the standards and principles defined in this code will be subject to discipline, up to and including termination, based on the severity and frequency of the violation. The disciplinary process is described in policies and procedures found in the employee handbook.

III. CONCLUSION

It is expected that each of us will follow AIM's policies and the Code of Conduct and report violations when they occur. We are all mandated reporters and share equal responsibility for identifying and reporting compliance concerns.

The Compliance Plan, Policies, and Procedures may be found on AIM Services, Inc.'s Employee Portal.

Do The Right Thing.

If you believe you know about conduct that may be illegal or unethical, you MUST report it to your supervisor, to the Confidential Hotline or the Compliance Officer.

You do not have to give your name and you can remain anonymous.

You will not be criticized or disciplined for calling the Confidential Hotline at



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