



OUR VISION

At Kulanu, all people are recognized and valued for their abilities.

OUR MISSION

Our mission is to enable each individual to reach his or her full potential, empowering each one to become a participating and accepted member of society, with a good quality of life and a hopeful future.

OUR VALUES

Integrity – consistently truthful, dependable, professional and ethical

Equality – fairness in all opportunities

Dignity – deserving of respect and consideration

Distinction – pursuing excellence via world-class best practices

Diversity – encouraging inclusiveness

Code of Conduct

Kulanu Academy's Code of Conduct encompasses all that we do. The Code of Conduct is an integral part of all activities of the organization and supports Kulanu Academy's mission to provide quality care to individuals with disabilities, and continuously improve the services provided to our program participants. We are committed to preventing the occurrence of unethical or unlawful behavior, stopping such behavior as soon as possible after discovery, and disciplining affected individuals who violate the Code, including affected individuals who neglect to report a violation.

Kulanu Academy and all affected individuals are committed to performing their responsibilities according to ethical and legal standards with honesty, integrity, fairness, good faith and respect for others and the law.

Kulanu Academy will act in the best interest of those served by the organization. Consideration should be given to whether an action is right, fair and legal and whether that action could withstand the scrutiny of outsiders, including:

- Program participants and their families
- Affected individuals
- Service providers and physicians
- Affiliates
- Vendors
- Payers

- ❑ Community agencies
- ❑ Regulatory agencies and
- ❑ The community

Maintaining high ethical and legal standards is not easy and sometimes requires difficult choices. Commitment to these standards should never be compromised for personal, financial, professional or other business objectives. All affected individuals must comply with this Code, immediately report any alleged violations of wrongdoing, and assist management and compliance personnel in investigating allegations of wrongdoing.

All individuals are responsible for complying with the Code of Conduct as part of their job. In addition, the following standards assist in understanding expectations, as well as providing examples of unacceptable behavior. Each program/department may add specific examples pertaining to their department as an appendix to this code.

1. **Deliver Quality Service:** Everyone is responsible for ensuring that all participants receive quality services, provided by staff/consultants with appropriate experience and expertise, and for understanding and adhering to the participant's rights. Affected individuals are expected to use sound judgment in the performance of their duties and to conform to the standards of their respective professions.

Examples of Prohibited conduct (but not limited to): Provision of service by staff/consultants who are unqualified according to their job description, such as failure to renew license or credentials; providing differential care based on the participant's race, religion, payer source, etc., rather than their needs.

2. **Respect and protect the confidentiality of participant and Organization information:** Everyone is responsible for maintaining the confidentiality of all records, including participant-specific information.

Examples of Prohibited conduct (but not limited to): Looking up a participant's/patient's record where there is no job-specific need to know; inappropriate release of participant information; use of confidential Organization information for personal gain.

3. **Comply with applicable laws, regulations, codes, and Organization policies and procedures:** Each affected individual is made aware of specific issues relating to their program and is responsible for adhering to state and federal laws, professional licensure/ registrations, business rules, Organization codes of conduct and policies and procedures. Policies and procedures were developed to ensure equity, fairness, safety, and protection for all affected individuals, as well as to ensure the proper function of the organization.

Examples of Prohibited conduct (but not limited to): Falsifying timesheets; falsifying mileage sheets; reporting to work under the influence of alcohol or drugs; consistently reporting late to work.

4. **Maintain accurate documentation, billing, coding, and reporting procedures and practices, both operational and financial:** Accuracy of data/records, as well as data retention, are important and necessary for the care of the people we serve and regulatory compliance. Kulanu Academy will only bill and accept revenues for which it is entitled.

Examples of Prohibited conduct (but not limited to): Filing claims to more than one payer (double billing), except in cases where there are legitimate, multiple funding sources, i.e., a primary and secondary insurance; falsified records used as a basis for billing; inaccurate coding; postdating orders/records; using white out on client or billing documentation.

5. **Conflict of interest:** Conflict of interest occurs in situations where a person has the potential to direct or influence a decision to his/her own gain. Affected individuals should report any potential conflict of interest concerning themselves or their family members to management.

Examples of Prohibited conduct (but not limited to): Accepting gifts of a value greater than \$50 individual gift or \$100 cumulative in a year, or any gift that could influence your work-related decisions, including providing preferential treatment (all gifts should be reported); participating in an outside activity that could improperly influence your actions, such as consulting with a competitor, without first disclosing that relationship to management; providing gifts to referral sources.

6. **Represent Kulanu Academy in a fair and honest manner in all interactions, and in a manner that promotes the public's trust.**

Examples of Prohibited conduct (but not limited to): Providing payment, gifts, discounts, rebates, free space, or any other item of value in exchange for referrals of individuals whose services are funded by Medicaid/Medicare; misrepresenting Organization services or ability to provide services; truth in advertising.

7. **Safeguard Kulanu Academy assets and the property of those with whom we do business:** Organization resources are to be used for job related purposes and not for personal gain.

Examples of Prohibited conduct (but not limited to): Personal use of equipment/supplies without management approval; use of computer systems and software that is not consistent with license agreements; misuse of Kulanu Academy or a participant's property including theft, misappropriation, or embezzlement.

8. **Respect and deal honestly and fairly with all individuals:** Show proper respect and consideration for all staff, consultants, volunteers, participants, and business associates. Demonstrate honesty in your dealings with others; admit mistakes.

Examples of Prohibited conduct (but not limited to): Calling in sick when you are not sick; lying to a participant or coworker or supervisor; inaccurate reporting of incidents or injuries.

9. **Employment Environment:** Kulanu Academy is committed to creating a safe and professional workplace where affected individuals and others are treated with respect and without regard to their race, gender, sexual orientation, age, religion, national origin, color, marital status, disability, or other protected characteristics. Business integrity, teamwork, trust and respect are the Organization's most important values. All Organization affected individuals must exhibit and promote respect, integrity, trust and teamwork in the workplace and must comply with this policy prohibiting discrimination and harassment in all facets of the Organization's work. All affected individuals are required to support

the Organization's commitment to a safe and professional work environment and to demonstrate appropriate behavior in the workplace.

Examples of Prohibited conduct (but not limited to): Conversations about another affected individual's race, sex, age, religion, national origin, color, marital status, disability, or other protected characteristics; considering someone's race, color, religion, gender, sexual orientation, national origin, age, disability, or other protected characteristic in making decisions about hiring, placement, assignment of duties, training, promotion, termination, compensation, benefits and other work terms; any form of unwelcome sexual advance, request for sexual favors or other verbal or physical conduct of a sexual or sex-based nature; providing differential care based on the participant's race, religion, payer source, etc.



Kulanu Code of Conduct Employee Attestation

I acknowledge that I have read and understand Kulanu's Code of Conduct. I agree to abide by its provisions. I will complete all required training courses on ethics and compliance topics. I understand the disciplinary action policies with regard to individuals who violate laws, regulations, standards, operating policies, the Code of Conduct or the Corporate Compliance Plan.

I understand that I have an obligation to report actual or suspected misconduct that may violate the Code of Conduct or Compliance Plan. I will forward all reports to my up line or the Corporate Compliance Officer. I will cooperate in internal and external audits and investigations by fully and truthfully providing information and by preserving all materials that might be relevant.

I understand that I may remain anonymous in any report filed with the Corporate Compliance Officer. If I am directly implicated in a compliance investigation and if my presence compromises the conduct of an investigation, Kulanu is obligated to remove me from my position while the investigation is in process. In the event of an investigation by federal or state authorities, I may be required to serve as a witness, and in this case, I may no longer maintain anonymity.

Kulanu maintains a strict policy of non-retaliation against those who report misconduct. Kulanu will not tolerate any kind of retaliation against anyone who raises concerns about a violation of the law, the code or agency policy in good faith.

Name

Signature

Date