

**Warm Haven has established a Corporate Compliance Plan which consists of the following key elements:**

- A Code of Conduct which outlines standards of behavior for employees, volunteers, consultants, vendors, board members, and other agents. The Code of Conduct provides guidance on legal and regulatory requirements, and ethical matters such as conflicts of interest. Whistleblower policies and protections are also addressed.
- Where authorized, screening of employees, volunteers, interns, contractors, board members, and vendors to ensure that none of these individuals or entities have been convicted of fraud or barred from participating in a Medicaid/Medicare program.
- Ongoing training and education of employees on the Corporate Compliance Plan and Code of Conduct.
- Availability of established channels for reporting suspected violations, including anonymous means of doing so through the outsourced 24/7 In-Touch Helpline.
- Protocols for investigation, follow-up, and correction of fraud and other Code of Conduct violations.
- Discipline of employees who violate Code of Conduct standards, or who fail to report known violations, and corrective action to rectify problem areas and prevent future violations.
- Continuous assessment of risks that might result in loss of revenue, non-compliance, or unethical behavior.
- Reviews of agency and Board of Trustees processes, practices, and procedures.
- Methods for voiding or repaying over-payments to the Office of the Medicaid Inspector General and a method for self-disclosing overpayments that are significant, that indicate fraud or abuse, or that indicate systemic problems.

Warm Haven requires that employees comply with all policies and procedures outlined in the Warm Haven Corporate Compliance Plan and Code of Conduct. Employees must also adhere to all applicable federal, state, and local laws, rules, regulations, and professional guidelines. Violation of these policies, laws, and regulations may result in corrective action up to and including termination of employment and referral to legal and/or oversight authorities.

Employees and those acting on behalf of (including board members) are required to disclose any actual or potential conflicts of interest and to seek guidance on how to handle such situations. A conflict of interest is any situation in which financial or other personal considerations may compromise or appear to compromise: (1) professional judgment; (2) the delivery of service; or (3) the individual's ability to act in the best interest of interests Warm Haven and its stakeholders. An actual or potential conflict of interest occurs when an individual is in a position to influence a decision that may result in a personal gain for that individual at the expense of the best interest of Warm Haven and/or the participants and families served by Warm Haven. Employees are expected to use professional judgment and act in an honest and ethical manner both professionally and personally.

Warm Haven employees may not accept significant gifts and gratuities from outside entities (families, vendors, etc.), although small, inexpensive tokens of appreciation are permitted. Business dealings with outside entities should not result in unusual gain for any involved party. This includes bribes, special fringe benefits, and unusual price breaks.

Warm Haven materials, products, designs, plans, ideas, and data are the intellectual property of Warm Haven and should never be released to an outside entity or individual except through normal established standard protocols with appropriate prior authorization. Any improper transfer of material or disclosure of information, even though it may not be apparent that an employee has personally gained by such action, is prohibited.

All employees, including supervisors and managers, are responsible for reporting misconduct, including actual or potential violations of law, regulation, policies and procedures, problems and concerns regarding questionable service provision, documentation, accounting, internal accounting controls, or auditing matters. Failure to report a known violation may result in appropriate disciplinary action up to and including termination.

Anyone with knowledge of a potential violation of law, regulation, policy or procedures has a duty to report that information. The In-Touch compliance helpline, (984)352-0102, has been set up so that employees who wish to do so can anonymously report problems, violations, and concerns or seek clarification of compliance related issues. Callers will have their confidentiality fully protected by the law. No attempt will be made to identify a caller who requests anonymity. Any violation of this policy may result in sanctions and penalties. Determinations as to the limit of confidentiality under the law will be made in consultation with legal counsel.

The compliance hotline is accessible 24 hours a day, 365 days a year. Individuals may also call or send email to [hello@warmhavenhome.org](mailto:hello@warmhavenhome.org)

Fraud can also be reported directly to the Office of the Medicaid Inspector General.

Employees and other individuals cannot exempt themselves from the consequences of their own misconduct by reporting the issue, although self-reporting may be considered in determining the appropriate course of action.

Supervisors, managers and other employees are prohibited from engaging in retaliation, retribution or any form of harassment against an employee for reporting a compliance related concern. Any supervisor, manager or employee who conducts or condones retribution, retaliation or harassment in any way will be subject to discipline, up to and including termination.

Warm Haven prohibits the termination, threatening, or otherwise harming of any employee or other individual based on the reporting of compliance or ethics concerns or participation in an investigation of violations. Individuals who bring organizational problems or criminal conduct to their supervisors, administrators, or the Compliance Officer are entitled to protection and remedies.

Failure to comply with the policies and procedures outlined in the Warm Haven Compliance Plan and Code of Conduct may result in corrective action up to and including termination of employment and referral to legal authorities.