

CODE OF ETHICS AND CORPORATE COMPLIANCE PLAN

The Chief Executive Officer, Board of Directors and staff of Achieve Services Inc. are responsible for fulfilling the mission and philosophy of the organization. It is the purpose of the organization to serve people with developmental disabilities in a manner that promotes the best interests and welfare of each person served. As an agency we are committed to professional ethics that support the values of the delivery of our services. These core values are: *Enrichment, Empowerment, Innovation and Integrity*. These standards and values are intended to guide our decisions, behaviors and relationships in the delivery of service to adults with developmental disabilities. In addition to the mission and values statement, the organization is committed to a policy of affirmative action and the following code of ethical behavior. These standards apply to all employees and the Board of Directors for Achieve Services Inc.

I. **RELATIONSHIPS WITH PARTICIPANTS**

All staff are committed to serving the individual needs of program participants, always placing the participants' interests above individual self-interest. Staff will uphold the rights of persons served, and treat them with dignity and respect at all times. Staff will maintain appropriate boundaries between their personal and professional life. Staff must demonstrate objectivity, integrity, respect and best practices in the delivery of service to our participants. Employees should be aware of their personal beliefs, values, needs, limitations, and the possible effects they may have on their work. Employees must be sensitive to real and perceived differences in power between themselves and others, to avoid the misuse of their influence. Staff will encourage participants to take part in Achieve activities to the best of their abilities within the scope of their individual program plan and available service delivery.

II. **PROFESSIONAL RELATIONSHIPS**

Staff will act professionally at all times, by upholding the highest standards of integrity, honesty, confidentiality, and fairness. Staff will use the same standards of professionalism with people in the community, colleagues, and people from other organizations and agencies, all of whom are working cooperatively for the benefit of the people being served. Personal and professional conflicts in the work place are to be resolved quickly, and constructively. Staff will not use a professional relationship to further their personal religious, financial, political or business interests, (for example: staff who have personal businesses outside of Achieve may sell to agency staff, but may not sell to participants at Achieve.) Staff who have personal businesses will not conduct personal business while on company time. In addition, Achieve is a non-discriminatory work place, which supports cultural diversity.

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III. **COMPETENCE**

Staff will participate in and promote employee educational and professional standards. Staff will abide by all laws and agency policies, including MN Vulnerable Adults Law, Data Privacy, and MN Rule 245D, and other areas specified in Achieve's Policies and Procedures.

IV. **BUSINESS/FINANCIAL/MARKETING PRACTICES**

Sound business practices will be followed at all times. The staff will not use confidential information or position to advance their personal, financial or private interests. The Chief Executive Officer will ensure that all products and services are marketed in a manner that does not negatively affect persons served, or exploit their disabilities in any way.

V. **VIOLATIONS**

Alleged or suspected violations of this code of ethics by a staff member will be referred to the appropriate supervisor. The supervisor will investigate the allegation. Achieve's CEO will be fully informed of any allegation being investigated. If the allegation is verified, the CEO and supervisor will administer disciplinary action as warranted. As the result of any investigation, the involved staff member(s) may be required to complete training on existing policies and procedures, or new protocols or procedures. All violations will be reviewed by Achieve's Internal Review Committee. Staff will have the opportunity to appeal any disciplinary action as a result of an ethical violation.

VI. **CORPORATE COMPLIANCE**

Corporate compliance is the sum of all policies, procedures, audits, prevention strategies, and corrective actions, reporting systems and staff training efforts that are developed and implemented at Achieve Services to prevent and detect any illegal or unethical activity and/or fraud, waste and abuse.

Achieve's Corporate Compliance Plan consists of the following components:

- a. Policies and procedures that are reasonably capable of reducing the prospect of criminal conduct. Examples of such policies include Financial Policies, Rights, Health and Safety, Legal Requirements, Data Privacy and Maltreatment of Vulnerable Adults.
- b. Dedicated staff assigned to monitor and enforce the Corporate Compliance Plan.
- c. Staff training which effectively communicates corporate compliance requirements to all levels of staff. New employees receive a comprehensive orientation, which includes a review of Achieve's policies and procedures. Training is also conducted with all employees of applicable policies annually.

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- d. Ongoing internal billing audits to insure that all billings are occurring and being billed accurately. In addition, an outside accountant reviews all income and expenditures monthly and an independent auditing firm conducts a complete audit annually.
- e. Ongoing Monitoring to ensure that the agency's Corporate Compliance Plan and the policies and procedures defined herein are being followed on a day-to-day basis.
- f. A "Whistle Blower" Policy for reporting suspicious activities so that employees can report these activities without fear of retaliation.
- g. Consistent enforcement and discipline for violators of the organization's Corporate Compliance Plan that would apply to all employees of the organization.
- h. Response and prevention initiatives to ensure that, after an offense has been detected, the organization must take all reasonable steps to respond appropriately to the offense and make modifications to prevent similar offenses from re-occurring.

VII. **Written compliance standards and procedures:**

- a. Achieve Services Code of Ethics applicable to all staff members.
- b. Internal Review Committee where participants can have policy and procedure issues reviewed.
- c. Participant Involvement Committee that gives participants a voice in policies and procedures.
- d. Monthly audit of billing to monitor billing activities for accuracy and compliance.
- e. Employee screening is done on all new employees including a criminal background study.
- f. Employee performance evaluations are done annually. Any issues related to agency policies and procedures are included in the evaluation process.
- g. The CEO of Achieve Services is designated as the Corporate Compliance Officer and as such is responsible for investigating all reports of waste, fraud, illegal activity, or other violation of Achieve's policies or procedures.

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- h. Quality assurance and zero tolerance of waste, fraud and illegal activity is the goal of the Corporate Compliance Plan. The plan requires monitoring of its implementation and regular reporting by the CEO to the Achieve Board of Directors.

Revised by action of the Achieve Board of Directors on: June 10, 2010

Approved by the Achieve Board of Directors on February 10, 2010, October 13, 2011, November 8, 2012, October 10, 2013, October 9, 2014, November 12, 2015, November 10, 2016; September 13, 2017, November 8, 2018, October 10, 2019