

Topic: Code of Conduct	Department: Entire agency
Original effective date: 1/8/07	Last revision date: 6/24/25
Owner: VP for Quality and Compliance	Frequency of reviews: Annual
Internal/Regulatory Reference(s) (all that apply): Social Security Act 1902(a)(68)	
Related documents/Links: Code of Conduct	

Policy: It is the policy of The Arc of Monroe (“The Arc”) that business, administrative and support functions promote personal and organizational outcomes; and implement sound fiscal practices.

Additional Information: The Arc is committed to and has an obligation to comply with all applicable federal and state standards. The Arc’s Code of Conduct is designed to assist staff in understanding the agency’s expectations around behavior as an employee. A current copy can be found in its entirety in the employee handbook. A copy is also attached. Conduct contrary to the expectations in any compliance policy or the agency’s Code of Conduct shall be considered a violation of the compliance program and related policies and procedures.

For the purposes of this policy, “staff” includes employees (including the CEO and senior management).

Procedure	
Task:	Responsible party:
General Guidelines:	
1. New staff are trained on The Code of Conduct during new hire orientation.	Education and Professional Development
2. Staff must review The Code of Conduct each year. They are required to follow it at all times. Questions about The Code of Conduct should be directed to the Chief HR Officer.	Staff
3. Within 3 months of joining the Board, new Board members will get a copy of the Board’s Code of Ethics and confidentiality agreement as part of Board orientation. They will get these each year they are on the Board.	Board leadership and administrative support
4. Agency staff and Board members will sign that they received it, understand it and agree to follow it.	Board members and agency staff
Manager Responsibilities:	
1. Managers have a responsibility to act as role models and establish the tone and expectation within their programs and teams for compliance with laws, rules, regulations, agency policy including the agency’s Code of Conduct.	Managers
Human Resources:	
1. Human Resources is responsible for developing, revising and maintaining the agency’s Code of Conduct, with the support of the compliance function.	HR

VP for Quality and Compliance:	
1. The VP for Quality and Compliance acts as the agency's Compliance Officer, as required by NYS law.	VP for Quality and Compliance
2. Has primary responsibility for administering the agency's compliance program, and related policies and procedures.	VP for Quality and Compliance
3. Acts as a resource for agency staff, management, leadership and the Board for issues related to corporate compliance.	VP for Quality and Compliance

Document revision record:

Revision Date	Release Date	Reason for change	Approver
5/13/08	5/13/08	Reason for changes not documented	P Dancer
7/14/09	7/14/09	Reason for changes not documented	P Dancer
5/25/11	5/25/11	Removed specific reference to the employee handbook.	P Dancer
5/22/12	5/22/12	Added annual review of the code of conduct for all staff; Removed reference to independent contractors	P Dancer
3/20/13	3/20/13	Added formal policy statement at the top	P Dancer
7/29/15	7/29/15	Reason for changes not documented	P Dancer
4/25/17	4/25/17	Reason for changes not documented	P Dancer
11/9/18	11/9/18	Reason for changes not documented	P Dancer
10/15/19	10/15/19	Transitioned to new procedural format	P Dancer
5/28/21	6/8/21	Fleshed out information and added discrete sections for managers, HR and the VPQC	ICC
7/21/22	8/8/22	Added that conduct contrary to the compliance plan is a violation of the compliance plan; defined "staff" for the purposes of this policy	ICC
2/10/23	3/16/23	Added phrase stating our commitment and obligation to comply with applicable federal and state standards	ICC
6/29/23	6/29/23	Typos and formatting corrected	ICC
5/17/24	6/26/24	Minor word changes and corrected typos	ICC
6/24/25	6/24/25	Spelled out Code of Conduct and CHRO as person to contact with questions on the code of conduct	ICC