

CORPORATE COMPLIANCE PLAN CCP

OVERVIEW

The L.A.D.D., Inc. Corporate Compliance Plan (simply referred to as the CCP) establishes standards and policies that clearly communicate appropriate ethical and legal behavior to help prevent fraud, abuse and other unethical practices; and to ensure all employees are striving to meet the highest standards of ethical conduct. The CCP also exists to provide a process for the people we serve, guardians, employees, personnel from other agencies, and community members to discuss or file complaints, grievances, violations, or problems with this organization or its employees, including Management, and to receive careful consideration and a prompt resolution.

The CCP is a document to help employees recognize and respond to some of the more sensitive and often problematic matters involved in conduct and ethics; specify, where possible, actions and inactions that are contrary to and that conflict with the duties and responsibilities; and guide employees in conducting themselves and their affairs in a manner that reflects standards of behavior and professionalism as required by L.A.D.D. Inc.

Additional guidance on matters of conduct is provided in the Employee Code of Conduct Handbook on specific policies, procedures, and directives disseminated by L.A.D.D., Inc. Management. All employees of L.A.D.D., Inc. are expected to follow an ethical practice which means working and providing care in a way that is honest, legal and respectful of others; and reflects the Mission, Vision and Values of L.A.D.D., Inc. This is a requirement for employment.

In order to provide the highest level of services and adhere to the L.A.D.D., Inc. Mission, Vision and Values; employees are expected to be honest and act with integrity. Standing in Truth is a core competency for all L.A.D.D., Inc. employees and Good Moral Character is a job essential requirement to remain employed and written in the job descriptions. Employees are expected to provide high quality care to vulnerable adults and children. In so doing, they must be honest, speak the truth, act and speak with integrity and positive intent. The people we serve rely on employees for their physical and emotional well being. To provide quality care, employees must be honest, and ethical. They must act with kindness and compassion, communicate with positive intent, and immediately correct and report any wrong doing. Employees who observe or are aware of violations of L.A.D.D., Inc. policies or procedures must report them to Management and/or the Corporate Compliance Officer immediately. Employees are required to keep the people we serve safe at all times.

L.A.D.D., Inc. is a non-profit corporation dedicated to making the difference in people's lives. L.A.D.D., Inc. must act ethically when establishing expectations of behavior, character, and conduct; and maintain the distinction between right and wrong, moral duty, and obligation to the community. L.A.D.D., Inc. is accountable for achieving results through improved quality of life.

L.A.D.D., Inc. standards for excellence are based on honesty, integrity, fairness, respect, trust, responsibility, and accountability in operations, governance, human resources, financial management, community supports and fundraising.

The CCP is based on the seven fundamental elements of an effective compliance program. It also contains policies and procedures related to compliance and conduct that it is important for employees to follow. In order to organize and simplify the CCP each element represents a section as follows;

- I. Designating a corporate compliance officer and compliance committee.
- II. Implementing written policies, procedures and standards of conduct.
- III. Conducting effective training and education.
- IV. Developing effective lines of communication.
- V. Conducting internal monitoring and auditing.
- VI. Enforcing standards through well-publicized disciplinary guidelines.
- VII. Responding promptly to detected offenses and undertaking corrective action.

SECTION I - Designating a Compliance Officer and a Compliance Committee

The Corporate Compliance Officer (CCO) is responsible for the supervision of the CCP, all related auditing and monitoring, policies and procedures and investigations. The CCO must be knowledgeable in all applicable standards and engage in ongoing training and education to prevent improper conduct, illegal activities or unethical behavior. The CCO has a direct reporting responsibility to the Board of Directors and the CEO so there is no actual or perceived conflict in investigating and reporting issues. The CCO has a job description and responsibilities specific to their position at LADD which includes;

- Provides ongoing training in compliance related matters, HIPAA/HITECH, DRA, FCA including Fraud, Waste and Abuse and Whistleblowers to all employees.
- Collaborates with other departments to direct compliance issues to appropriate departments for investigation and resolution.
- Responds to alleged violations of rules, regulations, policies, procedures, and Standards of Conduct by evaluating or recommending the initiation of investigative procedures. Develops and oversees a system for uniform handling of such violations.
- Acts as an independent review to ensure that compliance Issues/concerns within the organization are being appropriately evaluated, investigated and resolved.
- Monitors the performance of the Compliance Program and relates activities on a continuing basis, taking appropriate steps to improve its effectiveness.
- Insure confidentiality of all financial, services and personnel related issues.

LADD maintains a robust reporting mechanism for compliance issues and strives to make the CCO easily accessible to all stakeholders. Contact information for questions or filing a complaint is available;

- On the LADD Website
- Available in all Programs
- Included in online training initial and annually
- Included in the Service Information Packets

Complaints may be made openly or anonymously to the CCO and will not result in retaliation by LADD or its employees. Contact information for the CCO is routinely provided and includes email, toll free phone number, fax, or in person meetings. All stakeholders, including employees of LADD must immediately report to the CCO, any suspicion of fraud, waste, or abuse in connection with the business of LADD.

LADD maintains a Compliance Committee/Steering Committee that consists of individuals within the corporation who are in a position to affect the culture of the organization, knowledgeable in the operation of the organization and possess a diverse background/area of specialty. The CCO is the chairperson of the committee and utilizes the committee's expertise to assist with implementation of the CCP. The Committee serves as a resource to the CCO to assist with;

- Communicating the corporation's practices
- Assessing the corporation's risk
- Developing policy and procedure
- Taking corrective action

In addition, the role of the entire team of leadership at LADD is to establish and maintain a culture of compliance and ethical conduct. L.A.D.D., Inc. employees in Management and leadership positions are expected to:

- Serve as examples by modeling the expected behaviors.
- Create a culture of gentleness in the workplace, which promotes and reinforces ethical behavior, legal practice, and the organization's mission/core values.
- Insure that those they supervise have information and are educated regarding applicable laws, regulations, and policies and legal requirements pertinent to their function.
- Inform all staff they supervise that strict compliance with policies and regulation is a condition of employment and violation will result in disciplinary action up to and including separation.
- Make available the resources necessary to resolve ethical dilemmas.

- Encourage the reporting and discussion of concerns related to legal and ethical practice; insure adequate follow up to concerns.
- Insure that business practices do not compromise ethical behavior or our core values.
- Members of Management must instruct employees regarding compliance and monitor for compliance. Failure to do so may result in disciplinary action, up to and including separation from employment.

SECTION II – Implementing Policies, Procedures and Standards of Conduct

L.A.D.D., Inc. Employee Code of Conduct Handbook, the L.A.D.D., Inc. Directory and Management Manual contain several policies and procedures that provide standards and guidance for business operations. They are designed to help employees understand their rights and responsibilities, to work more efficiently and to behave and provide care in an ethical way. These resources are readily accessible on line for employees.

The purpose of L.A.D.D., Inc. policies related to the CCP is to establish principles of ethical behavior and identify areas with the potential to negatively impact L.A.D.D., Inc. Policies will also provide a method for reporting and documenting appropriate resolution of conflicts or ethics violations. It is the expectation that all L.A.D.D., Inc. employees complete their job in an ethical manner with the best interest of L.A.D.D., Inc. in mind at all times.

HIPAA SECURITY AND SAFEGUARD POLICY

It is the policy of L.A.D.D., Inc. to protect the privacy and confidentiality of protected health information for the people we support and the employees of L.A.D.D., Inc. The following safeguards/security measures have been implemented to ensure this privacy protection.

STANDARDS AND DEFINITIONS

- All L.A.D.D., Inc. Communication, Documentation, Storage Systems and Data Systems are considered to be part of the HIPAA Security and Safeguard Policy which include but are not limited to these medium/modes:
 - Telephone
 - Cell phones whether it be a L.A.D.D., Inc. device or a personal device,
 - Email
 - Text
 - Recording devices
 - Voice mail
 - Facsimiles
 - L.A.D.D., Inc. databases
 - Computers/laptops/tablets whether it be a L.A.D.D., Inc. device or a personal device that are used to access,
 - Internet
 - World Wide Web
 - Web based data systems
 - L.A.D.D. Inc. work products
 - Protected Health Information in paper and electronic formats,
 - Confidential employee information in paper and electronic formats
 - Any function related to employment with L.A.D.D., Inc. and result in the production or receipt of information, documentation or messages created, sent, received, accessed, or stored collectively constitute company records and property and therefore the following expectations must be followed by all employees at all times;
- Email and any usage of L.A.D.D., Inc. computers are not to be used in any way to harass, defame or humiliate. Electronic communications may not contain content that a reasonable person would consider to be defamatory, offensive, harassing, disruptive, or derogatory, including but not limited to sexual comments or images, racial or ethnic slurs, or other comments or images that would offend someone on the basis of race, gender, national origin, political beliefs, disability, sexual orientation, pornography, religious or political beliefs, national origin or disability. Employees who receive any emails via company

computers or from other employees with this content must report the matter to Corporate Compliance immediately.

- The L.A.D.D., Inc. electronic communications systems are to be used to conduct company business. Employees may not use the electronic communications systems for political causes; football pools or other sorts of gambling; illegal activities; seeking/inquiring about job opportunities outside of the organizations; non-work purposes; solicitations or advertisements for unrelated work purposes; or creating, possessing, uploading, downloading, accessing, transmitting, or distributing materials of a sexual nature. Employee communications need to align with the organization's MVV.
- Employees may not use L.A.D.D., Inc.'s electronic communications systems to post non-work related information, opinions, or comments to Internet discussion groups, Social Networking sites and other such forums. Employees are prohibited from passing off their views as representing those of L.A.D.D., Inc. Again, while at work; employees must follow the corporate values as required in the core competencies of their job description.
- There should be no expectation of privacy in anything accessed, created, stored, sent or received on the company's computer and data systems.
- Any computer activity during work hours or on L.A.D.D., Inc. computers, systems or network, including messages, may be viewed by L.A.D.D., Inc. without prior notice.
- Computers cannot be used for the transmission or viewing of profanity, adult related material, sexually explicit or otherwise offensive material.
- Virus protection is maintained by the IT/QA Department. No other forms of virus protection software are to be used or downloaded with out approval from the IT/QA Department.
- All transmissions of confidential information must be encrypted as specified by the HIPAA Security Rule.
- Employees must maintain a log-on password and screensaver password on all computers. Passwords must contain a combination of upper and lower case letters, numbers and functions. Ex: 1L#dd\$
- Employees should keep in mind that emails, texting or other forms of business communication must be communicated with a positive intent and must communicate appropriately and professionally.
- Only work related information or work products should be sent through email.
- Social Networking sites are subject to the HIPAA confidentiality standards regardless of time of use.
- Emails that go outside of the L.A.D.D., Inc. Citrix that contain any identifying information regarding a person served, such as full name or a description that would make them easily identified must be encrypted and only sent for the purpose of Treatment, Payment or Health Care Operations. The sender of this type of email should contact the agency where the information is being sent to see if they have a secure email system set up prior to sending this type of information or use L.A.D.D., Inc. encryption system.
- Electronic communications must be positive, motivating and fit the Mission, Vision and Values of L.A.D.D., Inc.
- Employees cannot download or add any programs to company computers without IT/QA Department approval. Removable storage devices are not to be used.
- Data backup must occur regularly according to the Technology Plan for all data with backup's stored offsite.
- Any portable device such as a laptop, tablet, cell phones with data access abilities, etc. will be password protected to insure no violations of confidentiality occur. Passwords must contain a combination of upper and lower case letters, numbers and functions. Ex: 1L#dd\$ Employees are never to give out their passwords or log in information.
- Although employees are expected to use passwords to access some of the electronic communications systems, such communications are not private and security cannot be guaranteed. In surfing the Internet and World Wide Web, employees should remember that all connections and sites visited may be monitored and recorded. Employees should assume that any communications – whether business-related or personal – that they create, send, receive, or store on their company's electronic communications systems may be read or heard by someone other than the intended recipient. In particular, highly confidential or sensitive information should not be sent through e-mail, the Internet, or the World Wide Web unless encrypted or password protected.

Employees may not upload, download, or otherwise transmit copyrighted, trademarked, or patented material, trade secrets; or other confidential, private, or proprietary information or materials in violation of any legal constraints. Employees may not upload, download or otherwise transmit any illegal information or materials. Employees may not use L.A.D.D., Inc.'s electronic communications systems to gain unauthorized access to remote computers or other systems or to damage, alter, or disrupt such computers or systems in any way, nor may employees, without authorization, use someone else's code or password or disclose someone else's code or password, including their own. Employees may not enable unauthorized third parties to have access to or use L.A.D.D., Inc. Electronic communications systems, nor may employees otherwise jeopardize the security of L.A.D.D., Inc.'s electronic communications systems.

Employees must use the utmost care in creating electronic communications. Even when a message has been deleted, it still exists on a back-up system, can be recreated, printed out, or may have been forwarded to someone else without its creator's knowledge. As with paper records proper care should be taken in creating electronic records, which may someday have to be produced in connection with legal and/or business needs. Paper documents created and received by an employee, it is each employee's responsibility to insure that those electronic messages that should be retained are in fact saved. Those messages that need not be retained should be deleted.

Any files downloaded from the Internet and any computer disks received from non-L.A.D.D., Inc. sources must be scanned with virus detection software before installation and execution. The intentional introduction of viruses, attempts to breach system security, or other malicious tampering with any of your employer's electronic systems including the L.A.D.D., Inc. databases and website are expressly prohibited and employees may face criminal prosecution.

All information accessed by employees either in electronic or written format will be done on a need to know basis. Unauthorized access to information not needed to complete job responsibilities is prohibited.

L.A.D.D., Inc. employees may be using electronic systems/databases in conjunction with contract agencies; and therefore, will be required to follow additional security standards (such as no printing of materials) set by those agencies in addition to all of the above rules.

L.A.D.D., Inc. reserves the right to monitor, access, retrieve, read, and disclose to law enforcement officials, contract agencies or other third parties all messages created, sent, received, or stored on the electronic communications systems without prior notice to the originators and recipients of such messages. Authorized employees may monitor the electronic communications of employees to determine whether there have been any violations of law, breaches of confidentiality or security, communications harmful to the business interests of L.A.D.D., Inc., or any violations of this policy and any other company policy and communication sent via L.A.D.D., Inc. computers or cell phones is the property of the corporation. There should be no expectation of privacy in anything created, stored, sent or received on the company's computer system.

PROCEDURE

Employees of L.A.D.D., Inc. are required to do the following:

1. To protect the privacy of the people's individual records:
 - a. Sign-out individual records when removing from the home, including the following information:
 1. Name of record leaving the home
 2. Date
 3. Employee Signature
 4. Destination
 5. Employee must sign again when record is returned and in place in the program.
 - b. While out of the program, employees must secure the record(s) at all times. This includes whether the record is on their person or locked in their vehicle as required. Employees must ensure that no information is visible at any time including through windows. This policy will be strictly enforced.

- c. Employees must take steps to ensure people who do not have a need to know or have permission to see information regarding the individuals we support do not have access to any individual records, information, etc.
 - d. When employees leave the program, they are responsible for securing the premises by locking all doors.
 - e. Records are to be secured in the programs at all times. Records must be secure in a manner that they are not readily recognized or available. Unauthorized persons cannot not have access therefore records are not to be left unattended.
2. Carrying confidential records:
 - a. Lock records in trunk, when possible.
 - b. If records have to be left in vehicle for a short amount of time insure vehicle is locked and records are out of sight.
 - c. Records must not be left in vehicle for an extended period of time, i.e. overnight.
 3. Any devices, whether it be a L.A.D.D., Inc. device or a personal device, containing confidential material (i.e. Laptops, Cell Phones with data access abilities, Tablets, Day-Runners, Planners, etc.) must be kept secure at all times and must be password protected. **The storage of confidential material on removable storage devices is prohibited.** All devices must be set to contain the approved L.A.D.D., Inc. confidentiality statement at the bottom of any business related communications.
 4. Verification of Identification:
 - a. Employees must ask for identification to verify the authority of anyone requesting entry into the program.
 - b. Employees must ask for identification to verify the authority of anyone requesting information regarding the person or program.
 - c. Employees must make reasonable attempts during phone conversations to verify the caller. Attempts could include obtaining the person's contact information, hanging up the phone and verifying the accuracy and authority or providing the contact information to a member of management so they may contact the individual.
 5. Faxing: Employees should make reasonable attempts to verify fax numbers prior to faxing confidential and private information.
 - a. Employees need to periodically call to verify the intended recipient receives the faxes.
 - b. Management will keep fax machines in a reasonably secure location.
 - c. Employees will use required L.A.D.D., Inc. cover sheet when faxing.
 6. With prior consent of the person receiving services or their legal representative a photograph of a person supported may be taken for the purposes of providing services to the person, determining the identity of the person or for education and training. The photograph, which includes still or can be video images, of the people supported may be taken with a program camera as long as that camera is kept locked and secured while not in use. The photograph is maintained in the person's record until discharge or until the purpose for which the photograph was taken no longer exists. In addition, some L.A.D.D., Inc. publications such as brochures, newsletters and reports or the L.A.D.D., Inc. website may include photographs of the people supported. This may only be done when a specific signed consent agreeing to the use of the photograph from the person or their legal representative has been obtained. Photographs of a person supported may be taken for purely personal or social purposes and shall be maintained as the person's private property not L.A.D.D., Inc. property.
 7. Video surveillance that includes recording of images is prohibited in keeping with the Michigan Mental Health Code MCL 330.1724.
 8. All L.A.D.D., Inc. office space is to remain locked while not in operation and all confidential information is to be locked in a secured location within the office. Individual workstations are to be maintained with all confidential information secured and computers logged off. Confidential information that is no longer in use or subject to destruction will be shredded by an approved contractor or at the point of production.
 9. All IT assets are secured per the Technology Plan to include use of mobile device security software, email encryption software and the use of an approved IT asset destruction contractor.
 10. Suspected violations of this policy can be reported to the Corporate Compliance Officer via the anonymous hotline, by email to corporatcompliance@laddinc.net or by submitting a Confidential Complaint. Reports may result in an investigation, assessment and notification to affected individual.

CELL PHONE POLICY

The purpose of the Cell Phone Policy is to provide guidance so employees understand their responsibility in meeting the needs of the people we support at all times and do not receive/respond to extensive personal non-emergency calls, texting, accessing applications or accessing the internet while at work using their cell phone.

Telephones are in the programs for the personal use of the people who reside there and for daily operations. Cell phones are in the vehicles for emergency purposes. A means of communication must be available at all time in the programs and vehicles. It is the job responsibility of all employees to ensure the needs of the people we serve are met at all times and the personal use of cell phones must not interfere with this responsibility.

STANDARDS AND DEFINITIONS

- An employee's primary duty while on shift is the safety and well being of the people served. Cell/Telephone calls, texting or use of any other communication devices must not interfere with this duty.
- If at any time, communication devices do interfere with an employee's primary duty; use will be restricted by Management. This may include excessive calls, texting, etc.
- **Devices for taking pictures of people served and/or capturing any information is prohibited by employees to insure HIPAA Compliance.**
- Employees must keep personal calls to a minimum. Personal calls must not exceed 3 minutes or interfere with the safety and well being of the people supported. Long distance calls are prohibited. Home telephone numbers or cell phone numbers should never be given out except to current employees of L.A.D.D., Inc. and if listed at your work location.
- Numerous interruptions at work and/or over use of cell phones may result in Management prohibiting the cell phone at the work location.
- Excessive phone/electronic device usage or phone calls over 3 minutes are considered a violation of the rights of the people supported and disciplinary action up to and including separation from employment may occur. All Employees are required to follow the standards of telephone usage which gives a time limit of up to 3 minutes, and this includes use of their own personal cell phone for talking, texting, emailing and/or internet. Excessive 3 minute use is prohibited.
- If at any time the care of the people we serve is being negatively affected, Management will not allow employees to bring their cell phones into the work place.
- If an employee is experiencing a situation in which s/he feels the need to have a cell phone at work due to medical or other issues; the employee needs to contact the Human Resource Department for review and approval for use.
- No calls, texting, or emailing are to occur while driving a vehicle. When necessary 911 calls must be made once the vehicle is safely on the side of the road.

Employees have permission to make local calls or receive calls of up to 3 minutes at their work location. Any calls resulting in an additional phone bill charge will be the responsibility of the employee to pay. Lengthy calls or numerous calls while on shift negatively effects the care of the people we support; and therefore is prohibited. This includes employees' own personal cell phones. ****Note – Use the Home/Program land line if able to make an emergency call so the 911 system can automatically track the location of the call to dispatch emergency personnel more readily.**

SOCIAL MEDIA POLICY

Social media communications must align with the L.A.D.D., Inc. Mission, Vision and Values. The L.A.D.D., Inc. Social Media Policy establishes enforceable guidelines for employees to conduct social media engagement in both official and unofficial capacities that promotes a safe environment for sharing subject matter expertise, assisting stakeholders in the event of a crisis such as a disaster or emergency situation and protection from violation of applicable regulations or laws.

Furthermore, this policy sets forth a framework for employees to make responsible decisions about their use of social media in or outside of work so that employee's performance and L.A.D.D., Inc. business interests are not negatively affected. At the same time it is understood that L.A.D.D., Inc. fully respects the legal rights of our employees including their rights under the National Labor Relations Board to engage in concerted and protected activities. If at any point this policy or parts thereof are determined to interfere with the legal rights of our employees then the rights of the employee will take precedence over the policy.

STANDARDS AND DEFINITIONS

Social Media – includes but is not limited to, all means of communicating or posting information or content of any sort on the Internet, including the following forums: blogs, podcasts, discussion boards, on-line collaborative information and publishing systems that are accessible to internal and external audiences (i.e., wikis), RSS feeds, video sharing, personal websites, and social networks such as but not limited to Facebook, Twitter, and Instagram as well as all other social media forms.

PROCEDURE:

L.A.D.D. Inc. recognizes the use of various online communities and the need to outline the expectations and responsibilities of employees' use of social media networks and internet-based communications. Such communications may include, but are not limited to accessing, using, posting, publishing, or monitoring online sites, forums, blogs, wikis, or video logs (e.g., Facebook, Twitter, LinkedIn, MySpace, YouTube, blogs, media sites and other similar online venues). The purpose of this policy is not to restrict an employee's protected activities under Section 7 of the National Labor Relations Act. It is to follow and uphold our organization's MVV.

1. While it is each individual's decision whether or not to use social media networks, employees should always be aware that their behavior and opinions may reflect on L.A.D.D., Inc.
2. Social media networking and internet-based communications by employees should be consistent with applicable laws and L.A.D.D., Inc. policy.
3. **Employees shall not publish, discuss or reference confidential information about any person receiving services including health information or information otherwise protected by HIPAA. This includes a person's name, photographs, diagnostic testing results and images, case information, or any information that may lead a reasonable person to be able to identify a person supported.**
4. Employee communications on social media networks or online communications should not contain information that identifies a person served identity or condition.
5. Employees shall respect the privacy rights of other employees, person's supported, contract agency and people in the community of L.A.D.D., Inc. by refraining from writing about or sharing information that may be considered a breach of privacy or confidentiality. Employees shall not publish, post, or discuss other people's personal information.
6. Employees have a right to their personal privacy. They have the right to keep their personal opinions, beliefs, thoughts and emotions private. Employees are prohibited from sharing anything via social media channels that could violate another employee's right to personal privacy.
7. Employee communications must not contain L.A.D.D., Inc. confidential, proprietary or trade secret information. This includes information about trademarks, sales, financial information, number of employees, salaries, person supported information and data, L.A.D.D., Inc. strategy and financial information, information provided to L.A.D.D., Inc. by third parties, or any other information that has not been publicly released by L.A.D.D., Inc. These are examples only and do not cover the full range of information that may be considered confidential and proprietary. Employees should refrain from using L.A.D.D., Inc.' name and/or logo or trademarks when using social media networks or online communications.
8. Each individual employee, professional, volunteer or other associate of L.A.D.D., Inc. or its affiliates is personally responsible for his or her content on social media networks and other online communications.
9. Any communications should reflect an individual's personal point of view and not the viewpoint of L.A.D.D.
10. Employees shall not represent, claim or imply that they are speaking for, or representing on behalf of L.A.D.D., Inc. The content should be clear that such communications are the individual's personal opinions and do not reflect the opinion of L.A.D.D., Inc. or its affiliated entities.
11. If employees, professionals, volunteers or other individuals associated with L.A.D.D., Inc. acknowledge their relationship with L.A.D.D., Inc. in an online community, they shall include disclaimers in their online

communications advising that they are not speaking officially on behalf of L.A.D.D., Inc.

12. Employees are solely responsible and liable for the content they post or publish and L.A.D.D., Inc. shall not be liable for any errors, omissions, losses or damages claimed or incurred due to any content posted or published by an employee. We encourage employees to use the L.A.D.D. Mission, Vision, and Values to help guide them in their actions and words.
13. Content or information posted or published remains available for indefinite periods of time.
14. Before posting or publishing, content should be considered carefully and caution should be exercised. Employees should exercise good judgment and strive to be accurate, fair and responsible when using social media networks and should be respectful and professional to fellow employees, supervisors, and L.A.D.D., Inc. Following the L.A.D.D. Mission, Vision, and Values will help you to communicate in a positive, open, effective manner.
15. Employees and others associated with L.A.D.D., Inc. may not post or publish disparaging material that is libelous, slanderous, or defamatory which identifies L.A.D.D., Inc., administrators, managers, supervisors, employees, or people supported/families, which is false and damages their reputation.
16. Employees need to be aware of their relationship to L.A.D.D., Inc. in all social media disclosures. Nothing gains more notice in social media channels than honesty or dishonesty. Employees who have a vested interest in something they are discussing, should acknowledge that relationship and point it out, so long as they can do so without forfeiting their legal rights to engage in concerted or protected activities related to their employment.
17. Employees are encouraged to use L.A.D.D., Inc.'s numerous options to employees to ask questions, make comments/give feedback and suggestions for improvements in the most efficient and effective manor via Corporate Compliance, Quality Assurance, and/or contacting Directors instead of posting information via electronic communications. Solutions to employment problems can be addressed using L.A.D.D., Inc. options whereas electronic postings offer no solutions.
18. Employees shall not access, use, post, publish, or monitor any social media network or online communication forum while at work at L.A.D.D., Inc., whether through personal communications devices, such as laptops, cell phones, smart phones, PDAs, or other similar devices, or while on L.A.D.D., Inc. computers, unless expressly authorized to do so for L.A.D.D., Inc. purposes.
19. Employees shall not download, install or use social media network software on L.A.D.D., Inc. computers.
20. Employees are responsible for understanding and being aware of the L.A.D.D., Inc. policy on harassment and violence at the workplace found in the Handbook/Code of Conduct and how those policies affect an employee's use of social media.
21. Employees may be disciplined, up to and including termination, by L.A.D.D., Inc. for communications, commentary, or images that violate this policy.
22. As evidenced by FEMA's adoption, social media tools are becoming increasingly important in local and incidental crisis and emergency management communications. Nevertheless, even in times of crisis, disaster or emergency, only employees with the authority to speak on behalf of L.A.D.D., Inc. are permitted to do so.
23. L.A.D.D., Inc. reserves the right to monitor, restrict, block, suspend, terminate, delete or discontinue access to any work-related social media network sites without notice and at its sole discretion.
24. Suspected violations of this policy can be reported to the Corporate Compliance Officer via the anonymous hotline, by email to corporatecompliance@laddinc.net or by submitting a Confidential Complaint.

TRADEMARK /LOGO USE POLICY

The L.A.D.D., Inc. Trademark/Logo use Policy describes the logo in clear terms, defines general classes of acceptable and prohibited use. The policy does not define every imaginable use of the logo, but does provide a clear path to seek approval for variations of the standard logo.

STANDARDS AND DEFINITIONS

- The L.A.D.D., Inc. logo can not be modified, used in an inappropriate manner or altered/used for reasons other than official L.A.D.D., Inc. business without the express written permission of L.A.D.D., Inc. Administration. This includes the use of altered logo on letterhead, clothing, websites, promotional materials or any other items.

- This L.A.D.D., Inc. Logo will help to strengthen the L.A.D.D., Inc. name and image through a consistent branding, a distinctive Logo used throughout all of our events, publications, and activities.
- The basic L.A.D.D., Inc. logo consists of two parts: the graphic element and the text element



We Value P.E.O.P.L.E.

- Proper use of the logo will incorporate both the graphic and text elements. It is understood, however, that certain uses of the logo preclude the inclusion of the text element. For example, use of the logo on a pin or badge, or on the spine of a book may necessitate the use of the graphic element alone. Wherever possible, however, the graphic and text elements should be used together.

PROCEDURE

Committees and projects of the L.A.D.D., Inc. organization are free to use the L.A.D.D. Inc. logo, provided the following guidelines are considered:

1. The logo and text should be used together, as defined, whenever possible.
2. The typeface shall not be altered or replaced with another.
3. The proportions of logo and text shall be retained any exceptions must be approved by Administration. It is understood that certain design opportunities necessitate the use of the logo without the text.
4. Decoration of the logo is acceptable as long as the basic logo remains clearly visible.
5. If a design is to include the L.A.D.D., Inc. logo then the design must be submitted to Administration for written approval prior to printing.
6. If requesting the L.A.D.D., Inc. logo to be used on a clothing item, then approval must also be sought for payment.
7. For clothing items the left chest is always only used for L.A.D.D., Inc. logo although the L.A.D.D., Inc. logo can be in other areas.
8. The people who receive support services from L.A.D.D., Inc., can have shirts that have positive sayings on them, but not the L.A.D.D., Inc. logo. This is, due to the fact this may draw unnecessary attention or stigma to them.

Prohibited Uses

Examples of prohibited use include, but are not limited to, the following:

1. Personal use of the L.A.D.D., Inc. logo in social networking sites such as Facebook, LinkedIn etc.
2. Any implication of endorsement by the organization or its activities;
3. Commercial uses (placement of the logo on product packaging);
4. An individual's use of the logo for purposes other than acknowledging membership or participation in our activities;
5. Combination of the organizations logo with another logo unless list of donators, etc.

L.A.D.D., Inc. reserves the right to take appropriate action in the event of a breach of this policy.

GOOD MORAL CHARACTER

DEFINITIONS

Good Moral Character - "Good moral character" means that term as defined in and determined under 1974 PA 381, MCL 338.41 to 338.47. It refers to a personal history of honesty, fairness, and respect for the rights of others and for state and federal law.

PROCEDURE

1. At the time of application each potential employee / volunteer will sign a Release of Information.
2. The Human Resources Department will at a minimum check three references and more as needed.
3. After the Conditional Job Offer has been signed by the potential employee, the Human Resource Department will complete a Drug Screening and Criminal History Background Check that meets contract requirements; these may include the DHS Child Abuse Registry, OIG, FBI fingerprinting , Motor Vehicle Report and ICHAT, etc.
4. If there is a criminal record and the potential employee indicated “no” on their application and/or the Denial of Existence of Criminal History the person will not be retained due failure to demonstrate honesty and integrity.
5. If potential employee has any adverse records that were correctly reflected on the application, then Administration will review the charges and or citations along with references to determine good moral character and suitability for the position.
6. At anytime during application process if unsatisfactory information is discovered then the Conditional Job Offer may be withdrawn in compliance with Fair Credit Reporting Act (FCRA). The Human Resources Department must discuss this information with the CEO if warranted prior to taking action.
7. All employees must continuously maintain Good Moral Character to remain employed. Therefore, all employees must report any criminal convictions, pending convictions and/or changes in Driver’s License status as outlined in their Employee Code of Conduct Handbook.
8. Criminal history reviews will be done annually or upon notification of the potential for an adverse finding on the criminal history check. If any adverse findings, then the following must occur:
 - a. Administration will review the record along with the individual’s personnel file/history and a separation consideration as to the continued employment of the employee will be made to the CEO. Each case will be handled on an individual basis to insure compliance with contracting requirements. The Michigan Workforce Background Check Legal Guide will be used as guidance for best practice.
 - b. Administration may ask the employee for additional documentation to establish conformity with the Good Moral Character definition. Such documentation could include; court documentation related to the illegal act, additional letters of reference assuring Good Moral Character, a statement from the employee detailing the incident, a statement obtained by Administration by stakeholders who have first hand knowledge of the employees work history/relationship with the people served, information regarding success of rehabilitation and personal letter from the employee detailing their rehabilitation. The CEO will review the additional material.
9. If it is determined that the employee no longer meets Good Moral Character, then the employee will be separated from employment.

CONFLICT OF INTEREST CODE OF ETHICS POLICY

It is the policy of L.A.D.D., Inc. to promote a positive public image that aligns with the Mission, Vision and Values of the company. All activities will be transparent and conducted in a manner that is free of perceived, potential or actual conflicts or ethical violations. Should such conflicts or violations arise a reporting mechanism as well as a system of documenting appropriate resolution will be followed.

STANDARDS AND DEFINITIONS

Principles of ethical behavior are found in the Values of the company and are carried over into the Core Competencies of every job description. Ethical behavior is demonstrated in many ways such as;

- Stand in Truth – Work and communicate with honesty, integrity and openness; having a willingness to improve qualities in self and the organization; and seeing all people as equal.
- Remain compassionate – Demonstrate kindness in action towards others, promote self confidence and self esteem and appreciate differences in people.
- Take responsibility – taking ownership for the decisions we make or fail to make, the actions we take or fail to take, and the consequences that result.

- Give respect – it is our duty to show a high regard for ourselves, others, and the resources entrusted to us. Resources entrusted to us may include people, money, reputation and the safety of others.
- Remain honest – it is critical to understand the truth and act in a truthful manner both in our communications and in our conduct. Our conduct must be free from competing self interest, prejudice, and favoritism.

A conflict of interest exists if circumstances would lead a reasonable person to question whether motivations are aligned with L.A.D.D., Inc.'s best interests. It is important to understand that a conflict of interest can occur;

- When an employee or their relative is in a position to benefit personally, directly or indirectly, from his or her relationship with a person or entity conducting business with L.A.D.D., Inc. the potential for a conflict exists; and therefore, must be scrutinized. All employees have an obligation to avoid conflict, or the appearance of conflict, between their personal interests and the interests of L.A.D.D., Inc. and not allow their impartiality to be questioned. Administrative review and/or Board review must review potential conflicts.

Conflicts are typically characterized as;

- Ethical – a decision is made or action is taken that is contrary to company policy and puts the company at risk or serves to undermine the integrity of company.
- Legal – a decision is made or action is taken that violates a law, regulatory standard, contract or agreement and puts the company at risk for possible criminal or civil penalties.
- Financial – a decision is made or action is taken that involves financial gain or risk at the expense of the company, jeopardizes financial solvency of the company or unduly impacts a contract or agreement.

Overview of areas where conflict or ethics violations can occur;

- Kickbacks and Gift Receiving for Personal Gain – Employees must be cautious of gifts that may be given with the intent to influence care or services provided and accepting such gifts have the potential to create conflicts of interest. Employees provide high quality services at all times.
- Loans – Borrowing or loaning cash or objects of value including company property can create a situation of inequality where repayment, reimbursement or recompense is conditional with one party having power over the other as part of the transaction.
- Political Activities – Activities completed as an individual and on personal time must clearly make a distinction that during these activities the individual is not a representative of L.A.D.D., Inc. and is not using L.A.D.D., Inc. materials, equipment or locations for their activities.
- Recreation and community activities – Participation in events and activities must be at the request or agreement of the person supported and/or their family. Since use of the person's and the company's funds are involved and the potential for involvement in activities and expenditures that benefit a L.A.D.D., Inc. employee over the person supported or the company are a possibility activities should be well thought, planned and approved.
- Paying a person receiving supports to do work – First and foremost involve issues of recipient rights if the person is not legally employed. Possible ethical concerns and conflicts can arise depending on the type of work, number of hours work is performed, the rate of pay and working conditions. All of these areas present substantial risk to the company and individuals and should be well thought out, planned and approved.
- Harassment and workplace violence – When situations are considered to be harassing or threatening in nature or make the working environment uncomfortable they should be reported immediately. Once reported the situation must be addressed immediately, according to policy. Failure to act can result in allegations of conflict of interest and ethical concerns. These issues must be reported to the Human Resource Department immediately and preferably within 10 days from the event.
- Promotions – Must be made in compliance with company policy which states candidates are selected based on their skills and experience and are the best matched for the needs of the company. Failure to do so can result in allegations of conflict of interest and ethical concerns.
- Solicitation – Distribution of written material such as pamphlets, booklets, newsletters and handbills that have the potential to shape opinion, promote or discourage a position present the possibility of undue influence; and therefore, not allowed.

- Sales and fundraisers – Raffles, charity drives, sports pools, cosmetic or jewelry sales, bake sales or the sale of any other item that has the purpose of raising cash or anything of value for the seller can result in unwanted pressure to the buyer where they feel an obligation to purchase or participate creates a situation of inequality; and therefore, must be approved by the Guardian and Administration.
- Outside employment – An employee who has an obligation to another employer creates a situation where the employee may act in the interest of the other employer over L.A.D.D., Inc. Outside employment by salaried on call employees must be reviewed by Administration.
- Supervising the work of someone with whom you have a relationship – Situations where an employee reviews, approves or controls a contractual or business relationship between L.A.D.D., Inc. and someone the employee has a relationship can be a conflict of interest. An employee who supervises reviews, determines compensation or assigns work to a family member can create a conflict. In these circumstances steps must be taken to demonstrate transparency, fairness, impartiality and objectivity. Steps taken need to be approved by the Human Resource Director, Steering Committee and/or CEO/ Board of Directors.

Upon separation from employment increased monitoring of relatives still employed may occur to assist with the mitigation of risk to the organization.

If an employee suspects a violation of this policy it should be reported immediately per the Complaint Reporting Policy. Additional reporting information is also available on the LADD website. The Whistleblowers Policy will be strictly adhered to at all times in the application of this Policy.

CORPORATE GIVING POLICY

In an effort to respond to the needs of our stakeholders and promote a positive public image that aligns with our Mission, Vision and Values; L.A.D.D., Inc. has established a process for the review and approval of requests for funds, gifts and/or donations that will benefit the greater community.

It is the policy of L.A.D.D., Inc. to engage in Corporate Giving that creates opportunities to advocate for the people supported, educate the public regarding L.A.D.D., Inc. and demonstrates our commitment to good corporate citizenship. Due to limited resources decisions will be made that have the potential for the greatest impact and will be on a first come, first served basis.

PROCEDURE

1. Stakeholders can contact a member of Management to request or ask for assistance in completing a Request for a Corporate Donation.
2. The Stakeholder, if needed, with Management assistance, will submit the Request for a Corporate Donation along with any other available information to the Director of Business.
3. The Director of Business will review and confirm the information contained in the Request for a Corporate Donation and submit the information to the CEO for approval.
4. Following a decision by the CEO, the Director of Business will communicate the decision to the person making the request and document accordingly.
5. If the decision has been made to make a donation the Director of Business will coordinate the donation and maintain documentation.

FUND RAISING POLICY

It is the policy of L.A.D.D., Inc. to engage in fund raising activities that create opportunities to benefit the people supported, educate the public regarding L.A.D.D., Inc. and demonstrate our commitment to good corporate citizenship. Strict oversight and accountability will be maintained to ensure all fundraising is completed in compliance with all applicable laws and regulations

PROCEDURES

1. **Prior approval for all fundraising must be obtained.** All Fund Raisers must be with reputable companies/organizations. The CEO must be made aware and authorize any fund raising activities or the intent to solicit funds.
2. All Fund Raisers must have a designated lead/responsible person who is responsible for all aspects of the Fund Raising including the funds collected. The designated lead can be a volunteer or designated by committee as outlined in #3 below.
3. A Fund Raising Committee may be established to aid in the fund raising process.
 - a. Fund Raising Committees will have a designated chair person as agreed upon by the group.
 - b. The Committee's designated chair person will be responsible to insure the appropriate approval and feedback have been obtained for Committee projects prior to moving forward with any fundraising projects.
 - c. Committee responsibilities for the Fund Raiser must be divided up and shared among all committee members equally.
 - d. Minutes for each meeting must be maintained and sent to the QA Department. Minutes shall include each member's participation and responsibilities.
 - e. Minutes will be distributed to all committee members for follow up action as well as to the appropriate Regional Directors.
 - f. Minutes may be shared at Management Trainings, Staff Trainings, through the Posting Boards via email for suggestions, input and implementation.
 - g. All members of the committee will have equal input.
 - h. Accurate financial records will be maintained for accounting purposes. All expenses and income will be accurately documented and checked by more than one committee member and logged on a ledger and documentation reviewed by the Director of Business.
4. At the conclusion of the Fund Raiser the designated lead must submit all monetary donations or fundraising funds to the Finance Department along with a full accounting and ledger of money spent and received. Final totals are reported to Director of Business and Steering/CEO.
5. Funds must be turned in to the Finance Department for deposit as needed if the Fund Raisings is to last multiple days.
6. A Finance Department employee will count the funds with the designated lead and reconcile with the ledger turned in.
7. The Finance Department will prepare and send funds and the ledger to LADD's Financial Institution for tracking and auditing purposes. Funds that have been collected with special instructions per the donor such as designation for use by one specific program will be identified on the ledger. If no specific programs are identified donations will be put into the Company Wide Fund Raising Account.
8. When funds are requested for us from the Fund Raising Account proper receipts must support the use of those funds and are to be turned into our Financial Company for reconciliation.

GIFTS, BEQUESTS AND DONATIONS POLICY

L.A.D.D., Inc. provides supports to vulnerable people; and therefore must insure at all times that care is never influenced or could appear to be influenced by gifts, money or favors. It must be made clear that L.A.D.D., Inc. decisions are made solely for the benefit of the people supported. Therefore, L.A.D.D., Inc. has established standards governing gifts, bequests, and donations to all employees.

It is the policy of L.A.D.D., Inc. to promote a positive public image that aligns with the mission, vision and values of the company. All activities will be transparent and conducted in a manner that is free of perceived, potential or actual conflicts or ethical violations. All gifts, bequests and donations will be reported so that proper approval, tracking and distribution will occur.

STANDARD AND DEFINITIONS

Compensation (of any type) to employees is only made from L.A.D.D., Inc. employer to employee. Therefore, to avoid any appearance of undue influence, protect the integrity of our employees and insure unbiased care of the

people we support, employees are responsible to direct anyone wanting to give a gift to the Corporate Compliance Officer using contact information available at the L.A.D.D., Inc. website.

All gifts, bequests, and donations (referred to collectively as donations) shall be used in strict compliance with the terms stipulated by the donor.

Official acknowledgment of donations will be made through the Business Department and accompanied by an appropriate reference for which the donor may use for tax purposes. If information is available L.A.D.D, Inc. will send a Thank You Note to the person or company who made the donation.

All monetary donations must be made out to L.A.D.D, Inc. and submitted to the Finance Department following the procedure below. Members of Management are not to accept any donations made out directly to the employee or in the form of cash or gift cards.

Under certain conditions and with approval by the CEO a deviation from these standards may be granted upon specific donor requests. Documentation must be completed by the Corporate Compliance Officer noting the request.

PROCEDURES

1. When possible prior approval for all donations must be obtained by a member of Management. If this is not possible due to the timing of the donation then approval must be obtained as soon as possible, after receipt, by a member of Management.
2. Following approval, donations such as merchandise, goods, services or items of value must be reported to the Finance Department. The Finance Department will log the item on the Donation Ledger noting the item donated, date of donation, the donor's name along with address of donor, value, any special instructions and if applicable who the donation is for must all be documented.
3. The Finance Department will notify LADD's Financial Institution of the donation, providing details noted in #2 above.
4. When necessary the member of Management responsible for receiving the donation will coordinate with the Director of Business to secure or store the item/s donated.
5. Following approval, all monetary donations must be submitted to the Finance Department unless special approval by the CEO has been obtained. Monetary donations must be reported to the Finance Department regardless of whether special approval for dispersing was obtained.
6. Finance Department employee will count down the funds with the member of Management responsible for receiving the donation.
7. The Finance Department will log the monetary donation on the Donation Ledger noting the amount donated, date of donation, the donor's name along with address of donor, any special instructions and if applicable who the donation is for must all be documented.
8. The Finance Department will prepare and send funds to LADD's Financial Institution for tracking and auditing purposes. Funds that have been collected with special instructions per the donor such as designation for use by one specific program will be identified. If no specific programs are identified donations will be put into the Company Wide Fund Raising Account. Monetary donations that are designated for specific programs/activities must be tracked by Management and then all receipts from these expenditures need to be turned back into LADD's Financial Institution to support the use of the funds. (i.e. A family donates \$200.00 to have a pizza party the program must turn back in \$200.00 worth of receipts to support use of the donation).

Special donation of Flex Time from one employee to another or company to employee - If an employee makes the decision to donate available flex time to another employee due to a hardship by that employee the Director of Human Resources will coordinate with the Regional Director to review and document the request and approval. The Director of Human Resources will coordinate to ensure documentation is kept in the personnel file of each employee and that time keeping and payroll are appropriately adjusted. The Steering Committee or CEO must approve employer to employee.

WHISTLE BLOWERS POLICY

L.A.D.D., Inc. will adhere to all laws and regulations that apply to the organization. The purpose of this policy is to support the organization's goal of legal compliance in all areas of business operations and service delivery. The support of all employees is necessary to achieving compliance with applicable laws and regulations.

If any employee reasonably believes that a policy, practice, or activity of L.A.D.D., Inc. is in violation of the law, they must follow the Complaint Reporting Policy or otherwise make a report per the reporting mechanisms defined in the CCP. All stakeholders, including employees of LADD must immediately report to the CCO, any suspicion of fraud, waste, or abuse in connection with the business of LADD and may do so without fear of retaliation. Complaints can be made anonymously or employees may disclose their name and allow the disclosure of their names with respect to any such allegations at their discretion by making their wishes known to the CCO. Follow up questions and investigation may not be possible or may be hindered unless the source of the information is identified.

STANDARDS AND DEFINITIONS

Retaliation occurs when an employer takes an **adverse action** against a **covered individual** because he or she engaged in a **protected activity**.

- An employee is protected from retaliation. It is the employee's responsibility to bring the alleged unlawful activity, policy, or practice to the attention of L.A.D.D., Inc. Corporate Compliance and provide L.A.D.D., Inc. with a reasonable opportunity to investigate and correct the alleged unlawful activity. The protection described below is only available to employees that comply with this requirement. Any actions or intentions to 'cover up' or failure to report information related to the issue will be appropriately disciplined.
- L.A.D.D., Inc. will not retaliate against an employee who in good faith, has made a protest or raised a complaint against some practice of L.A.D.D., Inc., or of another individual or entity with whom L.A.D.D., Inc. has a business relationship, on the basis of a reasonable belief that the practice is in violation of law, or a clear mandate of public policy. One of L.A.D.D., Inc.'s core values includes open communication at all levels.
- Additionally, L.A.D.D., Inc. will not retaliate against employees who disclose or threaten to disclose to a supervisor or a public body, any activity, policy, or practice of L.A.D.D., Inc. that the employee reasonably believes is in violation of a law, or a rule, or regulation mandated pursuant to law or is in violation of a clear mandate of public policy concerning the health, safety, welfare, or protection of the environment.
- An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including separation of employment.
- Directors, officers, employees, and volunteers should share their questions, concerns, suggestions or complaints with someone who can address them properly. The Corporate Compliance Officer and/or CEO can be contacted at any time.

CORPORATE RESPONSIBILITY PLAN

L.A.D.D., Inc. is a high quality community resource, for all citizens that will always guarantee ethical principals are met, respect for all people is given and a commitment to creating a corporate culture of personal responsibility and ethical business practices is maintained.

It is the policy of L.A.D.D., Inc. to promote a positive public image that aligns with the mission, vision and values of the company. Company activities will be transparent and conducted in a manner that promotes the principles of inclusion, diversity, human rights and opportunities for all; ensuring the community is better place because L.A.D.D., Inc. is a part of it.

STANDARDS AND DEFINITIONS

- Ensure all stakeholders, including employees understand the requirement to immediately report to the CCO, any suspicion of fraud, waste, or abuse in connection with the business of LADD.

- Ensure all employees are responsible to follow the organization's Mission, Vision, and Values and are trained in this area.
- Ensure that all employees are motivated and involved in the continuous improvement of the organization.
 - Value the training needs of all personnel and prepare an annual training program that includes issues of Corporate Social Responsibility in the training sessions.
 - Provide training to new employees on the commitments to Corporate Responsibility.
- Educate and demonstrate to the community the organization's Mission, Vision, and Values while providing services.
- Promote the use of natural supports from the community for person's receiving services.
- Identify, expand and diversify services that are needed in the community.
- Provide opportunities for community inclusion and integration for the people we support and others.
- Assert Human Rights and Values and to be aware of cultural differences and develop systems and procedures that ensure the promotion, protection, interpretation and application of human rights are interpreted the same across different cultural, ethnic and religious traditions.
 - Human rights are the natural-born rights for every human being, universally. They are not privileges.
 - Encourage inclusiveness and diversity.
 - Provide training in cultural diversity including human rights, moral responsibility, discrimination and standards of conduct and
 - Ensure employment of disabled personnel.
 - Guarantee coherence, equal opportunities and no discrimination.
- Ensure basic health, safety and accident prevention measures are taken.

STANDARDS OF CONDUCT

To establish standards for all L.A.D.D., Inc. employees, which provide for a respectful, safe, efficient and positive environment and are accessible and available so that all employees are fully informed of expectations and their responsibilities.

It is the policy of L.A.D.D., Inc. to set and establish standards for the guidance of all employees regarding expectations for acceptable behavior. The following represents only a partial list of unacceptable behaviors and conduct; a complete list of all possible violations would be impossible to write.

Honesty and integrity are an employment requirement. Infractions will lead to corrective action up to and including separation from employment.

BREACHES OF STANDARDS OF CONDUCT

1. Abuse, mistreatment or neglect of the people we support.
2. Borrowing items or money from the people we support.
3. Violating the boundary between employee and person served in any way. (Including but limited to inappropriate names, touching, etc.)
4. Falsifying documentation for services, employment application, time keeping, personnel, or other company documents or records.
5. Unauthorized possession or use of company or employee property.
6. Gambling, carrying weapons or explosives, alcohol, drugs, or violating criminal laws on company premises.
7. Fighting, throwing things, horseplay, practical jokes or other disorderly conduct which may endanger the well-being of any employee or company operations.
8. Engaging in acts of dishonesty, fraud, waste, abuse, theft or sabotage.
9. Being under the influence or possession of alcohol or illegal substances on company property and during work hours.
10. Using the company vehicle for personal use.
11. Engaging in sexual intercourse or other sexual behavior while on company property.

12. Threatening, intimidating, coercing, using abusive or vulgar language, or interfering with the performance of other employees.
13. Insubordination or refusals to comply with instructions or failure to perform reasonable duties which are assigned.
14. Unauthorized use of company material, time, equipment or property.
15. Damaging or destroying company property through careless or willful acts.
16. Conduct, which the company feels, reflects adversely on the employee or company.
17. Performance which, in the company's opinion, does not meet the requirements of the position.
18. Engaging in such other practices as the company determines may be inconsistent with the ordinary and reasonable rules of conduct necessary to the welfare of the company, its employees or the people we support.
19. Negligence in observing fire prevention and safety rules.
20. Other circumstances for which the company feels that corrective action is warranted.
21. Witnessing or signing legal documents without direction of supervisor.

This list is intended to be representative of the types of activities which may result in corrective action. It is not intended to be comprehensive and does not alter the employment-at-will relationship between employees and the company.

PROCEDURE

There is no progressive discipline policy.

1. Corrective action will be determined on a situational basis and approved by Administration.
2. The Employee Code of Conduct Handbook provides is available to review for employment expectations.
3. L.A.D.D., Inc. Employee Policies and Procedures are available to review for employment expectations.
4. Separations from employment are approved only by the CEO.

SECTION III. Conducting Effective Training and Education

All potential employees receive a copy of the L.A.D.D., Inc. Mission, Vision and Values at the initial interview in an effort to communicate to them the principles that guide the organization and the behavior that is expected if they are to be employed.

During new hire orientation employees are provided with;

- A copy of The Employee Code of Conduct Handbook outline and are trained on how to retrieve and review full policies and procedures.
- A copy of the directory of the CCP is included, on line access and how to review/search information.
- Receive training regarding the CCP and related topics such as the Deficit Reduction Act, Whistleblowers, HIPAA and HITECH.

Annually, all employees receive training regarding the CCP and related topics such as the Deficit Reduction Act, Whistleblowers, HIPAA and HITECH.

When people supported and Guardians begin services with LADD they are provided with a copy of the CCP Directory and on line access.

STAFF TRAINING POLICY

It is the policy of L.A.D.D., Inc. that all staff will receive training necessary for full compliance with contract, accreditation and regulatory standards at the time of hire and ongoing as changes occur. Additional training may be required as a matter of best practice to ensure staff provides high quality services in a compassionate and caring way to the people who we support.

All employees are trained in the Mission, Vision and Values and other applicable areas as necessary for the job responsibilities.

All employees who provide direct supports to people receiving services will complete additional training in contractually approved curriculums as determined by any regulatory agencies. This may include training such as;

- CPR/FA
- PCP
- Crisis Management
- Cultural Competency
- CCP, DRA, HIPAA and HITECH, FCA including Fraud, Waste and Abuse and Whistleblowers.
- MIOSHA

Employees of LADD are trained they must immediately report to the CCO, any suspicion of fraud, waste, or abuse in connection with the business of LADD.

As well as numerous other areas including the specific needs of the people supported. The Corporate Training Matrix identifies the training provided by position within the organization.

QUALITY IMPROVEMENT TRAINING

PROCEDURE

1. Each member of the management team will receive training regarding use and access to the Manager's Manual which contains all company policies, procedures and forms. In addition the Management Manual contains training materials and resources. All materials are arranged to maximize access and ease of use so Management provide training and education to employees.
2. The Management Manual is available via on line access on Citrix.
3. Several Quality Assurance documents, Corporate Compliance documents and training materials are available on line for management, employees, people supported/guardians and other stakeholders.
4. Each member of the Management Team receives training on the policies, procedures and expectations of L.A.D.D., Inc. on a routine basis by PPF (Policy, Procedure, Forms) online training and at staff and management meetings.
5. The minutes of all committees will be available for review.
6. CARF manuals will be available for review by the management.
7. Administrative staff will receive ongoing continuing education training in specialty areas and in turn train the Management Team.
8. Additional trainings will be made available to all management staff.
9. Mandatory team trainings will be held at least annually regionally and corporate wide.
10. Outcome reports will be reviewed by members of management for input on how to improve or maintain quality services.

SECTION IV. Developing Effective Lines of Communication

OPEN DOOR COMMUNICATIONS

L.A.D.D., Inc. makes every effort to promote and preserve the employee and supervisor relationship. Our Core Competencies, which are in every Job Description of every position at L.A.D.D. demonstrate the importance of open communication and L.A.D.D.'s commitment to this practice. It is important that all employees uses their voice and speak up when they see or hear issues and have ideas on ways to improve services!

STANDARDS AND DEFINITIONS

The company's employee relations policies emphasize open-door practices whereby employees are encouraged to deal directly with their immediate supervisor and other members of management regarding complaints or perceived inequitable conditions of employment in an effort to preserve a positive work environment.

Open, honest communication between managers and employees is a day-to-day business practice. Employees may seek counsel, provide or solicit feedback, or raise concerns within the company.

Management holds the responsibility for creating a work environment where employees' input is welcome, advice is freely given, and issues are surfaced early and are candidly shared without the fear of retaliation when this input is shared in good faith. This is the foundation for continuous quality improvement.

PROCEDURE – Using Your Voice

1. Verbal: At any time an employee feels a need to discuss concerns; the employee should contact their immediate manager/supervisor. The Human Resource Dept. is also available to discuss concerns.
2. Written: If the employee would prefer to put their concern in writing, they can email the Human Resource Dept. or may complete a Confidential Employee Complaint Form and follow the complaint procedure.
3. Employees may use a number of methods to make contact and review questions or concerns; these include;
 - Suggestion Box located in the office and online
 - Email to Human Resources, CCO or Director
 - Call to speak with a Director using on call/cell phones posted in L.A.D.D. programs
 - Walk in and/or call any L.A.D.D. office for an appointment
 - During question and answer at training
 - Through course evaluations
 - Complaint Form available online

COMPLAINT REPORTING POLICY

The intent of the L.A.D.D., Inc. Complaint Reporting Policy is ensure LADD adheres to all laws, regulations policies and procedures that apply to or have been adopted by the company, to provide a method of reporting suspected violations and document appropriate corrective action is taken. Management has the obligation to conduct a prompt, thorough, and impartial investigation.

It is the policy of L.A.D.D., Inc. to promote a positive public image that aligns with the mission, vision and values of the company. If any employee or stakeholder reasonably believes that some policy, procedure, best practice, or activity of L.A.D.D., Inc. is not being followed or is in violation of the law, regulation or contract standard a method to report is made available. All reports will be thoroughly investigated, without bias and immediate corrective action will be taken.

STANDARDS AND DEFINITIONS

There are several methods to report suspected violations;

- Complaint Form – the Complaint Form is available on line
- The LADD Directory – contains the Complaint Form. The LADD Directory is located online
- Suggestion Box – located on line and at the offices.
- Email the Corporate Compliance Officer – email address listed on line and on the Emergency Procedure Responsible Person List at corporatecompliance@laddinc.net
- Call the Corporate Compliance Officer – telephone number available on line and listed on the Emergency Procedure Responsible Person List.
- Call the anonymous hotline and leave a message – telephone number available on line; toll free.
- L.A.D.D., Inc. Privacy Practices – telephone number and address for contacting the Corporate Compliance Officer listed.
- Face to face meeting with a member of Management, Human Resource Director and/or Corporate Compliance Officer– unannounced meetings can be accommodated in most circumstances.
- Call a member of Management – Use the Emergency Procedure Responsible Person List to access the correct number to call.
- New Hire and Annual Training – includes contact information for contacting the Corporate Compliance Officer by toll free number phone, fax or email.

LADD is structured with a Corporate Compliance, Quality Assurance Department, Services Department and a Human Resource Department. Depending on the issue more then one department may need to be involved to

resolve. In certain circumstances it is possible to have a complaint from a stakeholder such as person supported, guardian, family member or employee reviewed by an external reviewer, outside of LADD.

The L.A.D.D., Inc. reporting system is designed with confidentiality and anonymity in mind. Every attempt will be made to assist people with reporting while maintaining confidentiality. This is a critical element of a robust reporting mechanism.

In addition, all individual stakeholders such as people supported, guardians and family members are afforded protection against retaliation or barriers to service.

Routine testing of reporting mechanisms will occur to ensure they are functioning correctly and reports are being received by the Corporate Compliance Officer.

People reporting who wish to remain anonymous may be provided with a date/time and/or numerical identifier. This numeric identifier may be used by the caller to identify him/her if additional information becomes available or further questioning is necessary.

All stakeholders, including employees of LADD must immediately report to the CCO, any suspicion of fraud, waste, or abuse in connection with the business of LADD.

Chain of Command (following the Chain of Command below is not a requirement for a compliance issue);

- Managers
- Area Supervisors
- Regional Directors
- Director of Services, Director of Human Resources and Director of Business
- Executive Director
- Chief Executive Officer(CEO) – The Corporate Compliance Officer has a direct reporting responsibility to the CEO and the Board.
- Board of Directors

PROCEDURE

Reported failure to follow company policy, procedure or best practice.

1. If a person becomes aware of a policy, procedure or practice that is not being followed they are expected and encouraged to report (complaint) the problem or situation to Management via one of the methods specified in the Definitions and Standards section of this policy.
2. It is the expectation of Management that complaints will be addressed at the level closest to the issue and therefore in the best position to take immediate action to make corrections.
3. It is the responsibility of the person and Management to follow the chain of command to ensure the report is carried through to the appropriate level of Management for resolution. It is not the intent of this procedure to limit or restrict reporting. The person may choose to report to any level of Management including the Corporate Compliance Officer at their discretion.
4. It maybe deemed necessary to hold a meeting to discuss the complaint to resolve the issue. Any level of Management can facilitate this meeting.
5. If a resolution is not found after discussion with Management or the resolution is unsatisfactory, then the person who filed the complaint should refer the complaint to the next higher level of Management using the Chain of Command specified in the Definitions and Standards section of this policy. At that time the person must provide Management with a written account of the problem or situation. If it is a compliance issue it needs to go directly to the CCO.
6. Management will investigate and review findings as appropriate. A report of progress will be completed within five business days to any written complaint. This process can continue up the Management chain of command. This process should continue through all levels of management until concerns are fully addressed.
7. If all the above steps fail to yield a resolution, a written detailed account of the complaint will be submitted to the Corporate Compliance Officer by the person for review. The Corporate Compliance Officer will complete

an investigation and report on progress within seven business days of the submission of the complaint in writing.

8. Provided a resolution has not been found, the final step in the complaint process is to have the complaint heard by an impartial Grievance Committee. This committee will consist of three or more people made up of one or more Professional Care Technicians or Management within the company. After the Grievance Committee has heard the complaint, a written account of their findings will be given to the person within fourteen business days. Recommendations by the Grievance Committee are advisory only.
9. The Quality Assurance Department and/or CCO will keep copies of all written complaints.

Report of suspected violation of law, regulation or contract standard.

1. If a person suspects a violation of law, regulation or contract standard they are expected and encouraged to report (complaint) the problem or situation to Management via one of the methods specified in the Definitions and Standards section of this policy.
2. It is the expectation of Management that all complaints received that are related to violation of law, regulation or contract standard are immediately reported to the Corporate Compliance Officer.
3. It is the responsibility of the Corporate Compliance Officer and/or Director to complete an investigation within five business days and complete documentation of findings. Investigations may include;
 - Interviews
 - Research of applicable laws, regulations or contract standards
 - Documentation of findings
 - A plan for corrective action
4. If the violation is substantiated the Director and/or Corporate Compliance Officer will review the findings with the Chief Executive Officer and/or Compliance Committee/Steering Committee who may seek legal counsel for guidance and corrective action steps.
5. When applicable full disclosure will be made to the correct governmental or legal authority. A written report of the investigation, findings and corrective action will be included as required.
6. Immediate action will be taken to implement corrective action.
7. The Corporate Compliance Officer will maintain investigation documentation, track data for trend analysis and report annually as part of the Strategic Planning process.

SECTION V. Conducting Internal Monitoring and Auditing

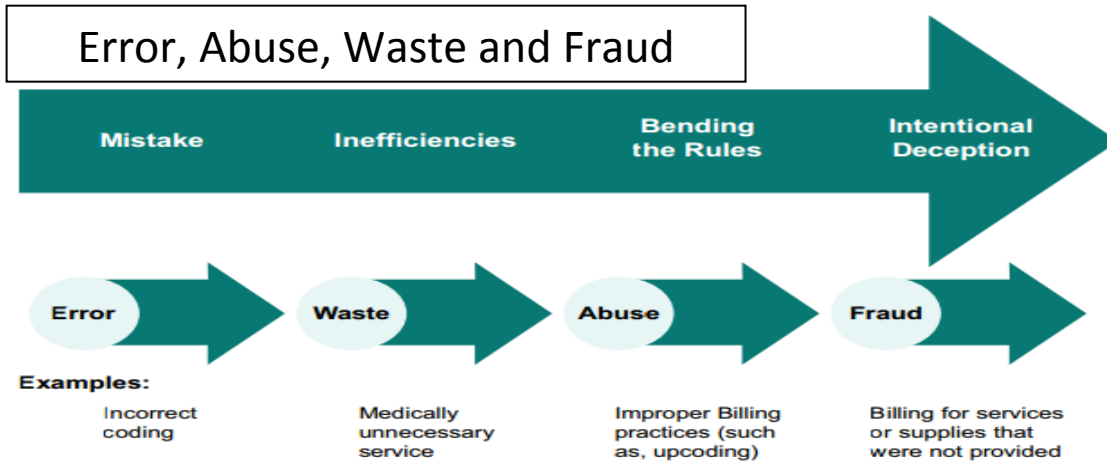
QUALITY ASSURANCE AUDIT POLICY

L.A.D.D., Inc. completes a comprehensive auditing and monitoring program designed to ensure all service provided by L.A.D.D., Inc. maintain the highest quality standards and are in full compliance with all applicable regulations, laws and best practices guidelines.

It is the policy of L.A.D.D., Inc. that audits are completed annually and as needed to verify the quality of services. Audits may include Quality Assurance Audits, Billing Verifications, Personal Allowance, Training Book, Medication, Plan of Correction and Safety/Barrier audits.

STANDARDS AND DEFINITIONS

- Error is making a mistake; being wrong with the belief the action taken was correct. A belief that what is false is true or that what is true is false.
- Waste is the inefficient use of resources. Providing a service in a quantity/quality that would not normally be necessary for the person receiving the service.
- Abuse is a practice that is not consistent with sound financial, business or medical practices and results in an unnecessary cost to the payer.
- Fraud is an intentional deception or misrepresentation by a person with the knowledge the deception could result in unauthorized benefit to him/her or some other person.



PROCEDURES

1. Audits are assigned by the Quality Assurance Supervisor who will give adequate notice of the audit to be completed, the timeframe for completing and the person to complete. An extension of thirty days may be given one time to the Auditor for the month the audit is scheduled, by contacting the Quality Assurance Supervisor. Any extensions requiring additional time must be approved by the Regional Director or the Quality Assurance Supervisor. Unannounced audits may also occur at any time.
2. The Quality Assurance Supervisor will review audit data on a monthly basis and complete reports as requested.
3. A Quality Assurance Team will assist with the process of auditing. The Team will be made up of employees such as Assistant Managers, Coordinators, and long-term Professional Care Technicians. Team members will be selected by the Quality Assurance Supervisor after submitting a letter of interest to the Quality Assurance Department. The Quality Assurance Supervisor will supervise all Team activities and provide ongoing training.
4. Unless otherwise determined the Area Supervisors will complete one full Quality Assurance Audit, annually in each program they supervise at a minimum. The Area Supervisor will review with management in advance the month the audit is due in the program. The purpose of the notification is to coordinate necessary personnel and records are available to complete the audit. A completed Quality Assurance Audit must be turned into the Quality Assurance Supervisor within seven days of completion.
5. Upon completion of the Quality Assurance Audit, a Plan of Correction (POC) is generated. The POC is reviewed by the Manager and the POC is given to the Manager to begin corrections immediately. Each of the areas that need corrections must be documented on the POC and must be completed within 30 days.
6. Once the Manager completes the POC, the Manager and Area Supervisor review for completeness, sign and date. The finished POC is turned into the Quality Assurance Supervisor.
7. Additional Quality Assurance Audits will be assigned by the Quality Assurance Supervisor as needed.
 - Billing Verifications
 - Personal Allowance
 - Training
 - Medications
 - Plan of Correction
 - Safety/Barrier audits
 - Additional Quality Assurance Audits as needed
 - Specialty Targeted Audits
8. Annual Outcome Management Reports will include Quality Assurance Audit data.

Risk Assessment – L.A.D.D., Inc.’s Management team will conduct an annual assessment in the area of Corporate Compliance to identify and monitor high-risk areas for the agency. Identified high-risk areas will be monitored and audited as deemed necessary by L.A.D.D., Inc.’s Steering Committee.

Billing Verification –Employees involved with billing practices and other business/administrative responsibilities are expected to uphold ethical practices and only bill for services identified in the person’s treatment plan, following service provision and as provided. Quarterly documentation verification reviews of a sampling of records of the persons supported to document that dates of services provided coincide with billed episodes of care, determine that the bills accurately reflect the services that were provided, and identify necessary corrective action.

AUDIT: RESPONDING TO AUDIT FINDINGS FROM EXTERNAL MONITORING AGENCIES

L.A.D.D., Inc. will respond to findings delineated in reports resulting from auditing by external regulatory agencies in a timely and thorough manner so that corrective action is completed and communicated within the entire organization and to the external regulatory agency.

It is the policy of the L.A.D.D., Inc. to operate in adherence to federal, state and local regulations or laws pertaining to service provision and funding source.

PROCEDURES

1. Upon receiving an audit report from a regulatory agency, the appropriate L.A.D.D., Inc. Director will review the report and collect information, resources and the appropriate personnel in order to take immediate corrective action and development of a written response to the external regulatory agency.
2. The Director is responsible for assuring the development of a response to each audit finding, by way of a Corrective Action Plan.
3. The Corrective Action Plan will address the following as needed:
 - The individuals affected by the findings.
 - The measures put in place or systematic changes made to insure that the practice does not recur.
 - Identify who will carry out these measures and who is responsible for completion.
 - Target dates for completion.
 - How the corrective action(s) will be monitored and who will do the monitoring.
4. The Corrective Action Plan will be sent to the external regulatory agency by the stated due date by the Director and file a copy in the correct Administrative file.
5. The Director will be responsible to ensure a thorough review of system changes has occurred and that any changes have been updated or incorporated by the appropriate Department.
6. The Director will be responsible for ensuring system changes resulting from the Corrective Action Plan have been communicated throughout L.A.D.D., Inc.

SECTION VI. Enforcing Standards Through Well-Publicized Disciplinary

Guidelines

Personnel receive an Employee Code of Conduct Handbook at the time of hire and training on going in employment policies/procedures that establish issues in which employees will receive disciplinary counseling and/or possible separation from employment. Personnel matters are confidential by nature and as such, most often, violators of the CCP will not have publicized disciplinary action. However, violations of the CCP will be addressed through timely and consistent disciplinary action which could include separation from employment.

All CCP Violations are immediately corrected, including any additional education and training that is necessary for prevention. All employee violations including, CCP violations will be tracked via the Disciplinary Tracking System and monitored for trends by the Human Resources Department. When a trend has been identified as requiring implementation of measures to prevent ongoing violations it will result in education and training of Employees

Company wide. Education and training is primarily addressed during semi or annual training or through in person meeting/trainings in all programs.

The purpose of this approach is to inform employees regarding LADD's efforts to combat fraud, waste, and abuse in the organization; to provide general information regarding the CCP, to describe the remedies and fines for violations that can result from certain types of fraudulent activities; and protections for reporting individuals.

In most cases, remedial actions are designed to improve the performance of L.A.D.D., Inc. employees. Management will identify the exact nature of and need for remedial action in collaboration with Administration and/or CCO.

PROCEDURES

1. Upon investigating what appears to be an action or a situation requiring remedial actions, (as a result of negligence or inadvertence) the CCO/Management will clarify policies, review and revise, if necessary, administrative procedures in order to prevent future errors. If remedial action is deemed necessary, the affected individual(s) will be notified, informed of the concerns regarding their performance, and made aware, if applicable
2. Behaviors that could require remedial actions might include the following:
 - Failure of an individual to understand and carry out required procedures and policies;
 - Inappropriate or improper implementation of the L.A.D.D., Inc. Corporate Compliance Plan;
 - Not reporting when aware of issues;
 - Negligent or malicious behavior.
3. Remedial actions may include:
 - The individual(s) will be required to take part in an educational/training program focused on the problem area and/or
 - The individual(s) may be reassigned, suspended with or without pay, demoted, transferred or subject to other disciplinary action up to and including separation from employment.
 - An employee will be subject to disciplinary action if L.A.D.D., Inc. concludes that the employee knowingly fabricated, exaggerated, or minimized a report of wrongdoing to either injure someone else or to protect him/herself or others.
 - An employee whose report contains admissions of personal wrongdoing will not be guaranteed protection from discipline. L.A.D.D., Inc. generally will give positive weight to self-confession in determining disciplinary action but the extent depends on factors such as whether the employee's conduct was previously known to L.A.D.D., Inc., whether discovery of the conduct was imminent, and whether the confession was complete and truthful and whether the conduct violated people's rights or agency contracts or other regulations.

SECTION VII. Responding Promptly to Detected Offenses and Undertaking Corrective Action

STANDARDS AND DEFINITIONS

- Failure to comply with the L.A.D.D., Inc. Corporate Compliance Plan or the laws and/or regulations applicable to federally funded behavioral health care programs, or any program of training, counseling or remedial action which an employee has been required to undertake pursuant to Section A above, may result in discipline up to and including separation from employment or association with L.A.D.D., Inc.
- In cases of intentional misconduct, repeated violations, or after documented remediation(s) have failed to correct the problem, L.A.D.D., Inc. may initiate corrective or disciplinary actions. The initiation of corrective or disciplinary action by L.A.D.D., Inc. does not preclude or replace any criminal proceedings that may be taken by the appropriate legal authority.
- L.A.D.D., Inc. employees are subject to corrective or disciplinary action under applicable existing L.A.D.D., Inc. personnel policies.

- The use of progressive discipline or the designation of a specific offense as dischargeable does not prohibit L.A.D.D., Inc. from terminating employment for any or no reason, with or without cause, as L.A.D.D., Inc. may deem to be appropriate. L.A.D.D., Inc. may terminate/separate from employment without prior warning or notice as noted in the 'At Will' statement in the Employee Code of Conduct Handbook that all employees review and have available on line. According to the Federal Sentencing Guideline (8A1.2.3.k(5)), L.A.D.D., Inc. provides a reporting system whereby employees and other agents can report, without fear of retribution, suspected criminal conduct by others within the organization.

CLOSING

L.A.D.D., Inc. is committed to all elements of the Corporate Compliance Plan and continuously reviews and revises policies, procedures and practices to remain compliant with all laws, regulations and standards of best practice. L.A.D.D., Inc. is committed to standards for ethical practices concerning staff, Management and all operations of L.A.D.D., Inc. Inclusive in these is the expectation that support services are provided responsibly, fairly and with awareness of the surrounding community and provide services consistent with L.A.D.D., Inc. Mission, Vision and Values.