

The Arc Jefferson - St. Lawrence New York POLICY AND PROCEDURE	POLICY #: 502G (formerly 509A)	REVISION #/DATE: #1, 02/2022; #2 02/2023
BOARD APPROVAL DATE: 3/25/2021	DATE ISSUED:	EFFECTIVE DATE: 1/1/2019
TITLE: Corporate Compliance Plan Reporting Compliance Concerns		PAGE: Page 1 of 2

## Corporate Compliance Plan Summary

### Element 1 Reporting Compliance Concerns (Methods to Report)

#### Governing Laws & Regulations

- Section 715-B New York Not-for-Profit Corporation Law (NPCL)
- Section 740 of the New York Labor Law
- Section 363-D of New York Social Services Law
- Title 18 Part 521 of New York Codes, Rules, and Regulations

1. **Policy:** Strict adherence to The Arc Jefferson - St. Lawrence’s Corporate Compliance Plan and Code of Conduct is vital. The Arc Jefferson - St. Lawrence requires all persons who are affected by our risk areas including employees, the CEO, other senior administrators, managers, contractors, agents, subcontractors, independent contractors, the governing body, corporate officers, and people supported (hereafter referred to as “affected individuals) to promptly report any known or suspected violation(s) of the Corporate Compliance Plan, Code of Conduct, policies and procedures or any of the federal, state, or local statute, laws, rules or regulations, executive order, or any judicial or any administrative decision by which The Arc Jefferson - St. Lawrence is governed. This policy governs the procedure to be used by affected individuals to report compliance concerns and seeks to ensure that The Arc Jefferson - St. Lawrence provides an environment that encourages individuals to report any suspected violations without fear of retaliation or retribution. Former employees are also covered under the protection from retaliation/intimidation section of this document and Policy #502H, Whistleblower/Anti-Retaliation/Non-Intimidation.
  
2. **Scope:** This policy applies to all persons who are affected by our risk areas including employees, the CEO, other senior administrators, managers, contractors, agents, subcontractors, independent contractors, the governing body, corporate officers, and people supported (hereafter referred to as “affected individuals) of The Arc Jefferson - St. Lawrence. The policy is distributed to all affected individuals who provide substantial services to The Arc Jefferson - St. Lawrence. Distribution is satisfied through posting of this policy to The Arc Jefferson - St. Lawrence’s website or at the corporate offices in a conspicuous location available to all affected individuals. The Board oversees implementation of and compliance with this policy.
  
3. **Procedure:**
  - A) **Duty to Report**
    - Affected individuals are required to report any known or suspected violations of the Corporate Compliance Plan, Code of Conduct, policies and procedures or any of the laws, rules, or regulations by which The Arc Jefferson - St. Lawrence is governed to their supervisor, manager, the Corporate Compliance Officer, or through The Arc Jefferson - St. Lawrence’s Compliance/Ethics Helpline.
  
  - B) **Reporting through The Arc Jefferson - St. Lawrence’s Compliance/Ethics Helpline**
    - Affected individuals may report their compliance concerns confidentially to the Compliance/Ethics Helpline. The Compliance/Ethics Helpline telephone number is

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315-379-0340. Callers to the Compliance/Ethics Helpline may make reports anonymously. No caller will be required to disclose their identity and no attempt will be made to trace the source of the call or identity of the caller when the caller requests anonymity. The Compliance/Ethics Helpline is untraceable.

- If a caller has revealed their identity, confidentiality will be maintained to the extent practicable and allowed by law. Callers should be aware, however, that it may not be possible to preserve anonymity if they identify themselves, provide other information that identifies them, the investigation reveals their identity, or they inform people that they have called the Compliance/Ethics Helpline. Callers should also be aware that The Arc Jefferson - St. Lawrence is legally required to report certain types of crimes or potential crimes and infractions to external governmental agencies.
- The Compliance/Ethics Helpline telephone number shall be visibly posted in a manner consistent with employee notification in locations frequented by The Arc Jefferson - St. Lawrence affected individuals.

### **C) Additional Methods of Reporting**

- Affected individuals may report their compliance concerns confidentially via The Arc Jefferson - St. Lawrence website by clicking on “About,” “Corporate Compliance,” and “Confidential Communication Form.” Users of the website communication form may make reports anonymously. No user will be required to disclose their identity and no attempt will be made to trace the source of the user or identity of the caller when the caller requests anonymity.
- Affected individuals may report their compliance concerns to any member of the Corporate Compliance Department by telephone, email, or in person. Notification information shall be visibly posted in locations frequented by The Arc Jefferson - St. Lawrence employees, directors, officers, and volunteers.

### **D) Tracking/Investigation of Reports (see Policy #508A)**