

# Circare

## Code of Conduct

(version 8.21.2019)



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## Purpose of the Code of Conduct

Circare is committed to conducting business in accordance with applicable laws, rules, regulations, and professional standards, and with honesty, fairness, and integrity. It is expected that each member of the Circare workforce — agency, state, contract, and temporary employees, Board of Directors, interns, volunteers, vendors, contractors, and consultants — will perform their duties in good faith, in a manner that he or she reasonably believes to be in the best interest of Circare and the people served by the agency, and with the same care that a reasonably prudent person in the same position would use under similar circumstances.

None of this happens successfully, however, without the highest standards of ethics and integrity. Everyone in the Circare workforce plays an important role in upholding these standards.

Circare's Code of Conduct has been developed to help you understand and meet these standards. Please take a moment to read it. This is the commitment we all make as we work in support of our mission, vision, and core values.

Thank you for the part you play in assuring Circare continues to be an agency of which we can all be proud.

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## Mission, Vision, & Core Values

### Mission

To act as a catalyst for developing partnerships, fostering hope, inspiring creativity, and promoting dreams.

### Vision

Circare programs are designed to help individuals and families, who have encountered certain obstacles, develop the resources and supports to live a satisfying, naturally interdependent life. Services are available to adults and children living in Onondaga County.

### Core Values

- Evidence based practices have been a cornerstone of the Circare service philosophy since our inception.
- We remain committed to recovery oriented services for adults and person centered planning approaches.
- Family strengths models for serving children and families, including wraparound as an evidence based practice is the foundation of care management for children and their families.
- System change and services improvement through a focus on outcomes that are meaningful to people.
- Improving healthcare through technology.

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## Commitment to Stakeholders

**To the individuals we serve:** We are committed to providing the highest quality of care, in a caring and compassionate manner and conscious of unique individual needs.

**To the individuals, families and communities we serve:** We are committed to understanding the unique needs of the individuals we serve and to provide quality services.

**To our workforce:** We are committed to a work setting which is safe, which treats all individuals with fairness, dignity and respect, which affords all individuals an opportunity to grow, to develop professionally, and to work in a team environment where all ideas are welcome and considered.

**To our third party payers:** We are committed to working with our payers in a way that demonstrates our commitment to our contractual obligations and reflects our

shared concern for delivering quality services in efficiently and effectively. We encourage our payers to adopt their own set of ethical principles that recognize their obligations to the individuals we serve, as well as the need for fairness between providers and payers.

**To our regulators:** We are committed to creating an environment in which compliance with applicable laws, rules, regulations, and standards is woven into the fabric of Circare's culture. We accept responsibility to self-govern and monitor adherence to regulatory and governmental requirements and our Compliance Program.

**To our vendors, contractors, and consultants:** We are committed to fair competition among existing and prospective vendors and contractors. We encourage our vendors, contractors, and consultants to adopt their own set of standards and ethical practices.

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## Compliance Matters: Know What's Right. Do What's Right. Speak Up.

**Compliance Begins with You.** Healthcare compliance means making sure we follow the rules in our everyday work activities. In order to achieve this important goal, the agency needs everyone's commitment to:

- (1) avoid situations that are improper or that even give the appearance of being improper; and
- (2) report any activities that may violate the Circare Compliance Program.

As a member of the Circare workforce you are required to report compliance issues, concerns, or violations of which you become aware, even if you only suspect that a problem exists or has occurred. Failure to report is itself a violation of the Compliance Program.

**Compliance Program.** The Compliance Program is led by the Compliance Officer and Circare management. Our goal is to prevent and detect situations in which our behaviors do not follow applicable laws, rules, regulations and standards. We do this by:

- ▶ training and educating our workforce,
- ▶ identifying and monitoring high-risk areas,
- ▶ maintaining anonymous and confidential ways to report concerns,
- ▶ responding promptly to compliance issues, concerns and violations,
- ▶ protecting individuals who report compliance issues, concerns, or violations in good faith, and
- ▶ taking corrective action when the rules are not followed.

**Who Makes the Rules?** Healthcare compliance programs are mandated by both federal and state laws. In the early 1990s, the federal government began a massive campaign to prevent, detect, and correct fraud and abuse in billing. You are likely aware that the Health Insurance Portability and Accountability Act (HIPAA) sets standards for the privacy and security of client data. HIPAA also created the Health Care Fraud and Abuse Control Program, a far-reaching government program to combat fraud and abuse in healthcare. Other laws have been passed that have increased federal and state governments' efforts to address concerns about improper activity in federal healthcare programs, including the Federal Deficit Reduction Act (2005), the Fraud Enforcement Recovery Act (2009), and the Health Care Reform Laws (2010). Healthcare

regulations are enforced at the federal level by the Office of the Inspector General in the Department of Health and Human Services, and at the state level by the Office of the Medicaid Inspector General.

### What Are Fraud and Abuse?

**Fraud** means intentionally misrepresenting facts, knowing that the deception could result in some unauthorized benefit — usually payment from a healthcare program such as Medicare, Medicaid, or a private insurer.

**Abuse** involves actions that are inconsistent with accepted sound medical, business, or fiscal practices. Abuse directly or indirectly results in unnecessary costs or improper payments.

Both fraud and abuse carry significant penalties. An individual and/or healthcare provider can be found guilty of fraud or abuse if they knew *or should have known* something was wrong.

**What Are the Penalties?** If Circare or you are found guilty of violating compliance regulations, we and you could be subject to:

- ▶ financial penalties ranging up to \$21,563 per improper claim;
- ▶ exclusion from participation in Medicare/Medicaid and other federal healthcare programs;
- ▶ criminal penalties including imprisonment; and/or
- ▶ government oversight of a mandatory compliance plan.

**Self-Monitoring.** Appropriate individuals in key management positions are responsible for developing and implementing self-monitoring policies and procedures within specific departments/programs. The Compliance Officer is responsible for auditing self-monitoring processes.

**Internal Audits.** Internal audits help to review key agency activities to make sure they are effective. Internal audits provide useful feedback to management, staff, and the Board of Directors about how well we are identifying and controlling risk.

Self-monitoring and internal audits serve two distinct but complementary functions, both aimed at helping Circare be the best it can be.

## Speak Up: How to Report a Concern

Reports can be made verbally, by any written communication, or by telephone. When making a report of a compliance issue, concern, or violation, it is important that you provide us with as much information as possible.

Please tell us:

- ▶ **who** is involved,
- ▶ **what** the involved parties are doing,
- ▶ **when** the improper acts occurred or are occurring,
- ▶ **where** they occurred or are occurring,
- ▶ **why** you think they are occurring, and
- ▶ **how** you have come to know about the problem.

### **EthicsPoint: 844.241.6860 -or- [circare.ethicspoint.com](http://circare.ethicspoint.com)**

If you are not comfortable raising an issue in your program/department, or if you have raised a concern and feel that it has not been addressed, you can call EthicsPoint or visit the EthicsPoint website. You can report anonymously — without identifying yourself — when you make a report to EthicsPoint. EthicsPoint is confidential and available 24 hours a day, every day of the year.

**We Respect Your Confidentiality.** The identities of reporters who request confidentiality and those who report via EthicsPoint will be kept confidential within the compliance reporting structure. At times the agency may be required to disclose a reporter’s identity when a matter is turned over to law enforcement.

**You Are Protected from Intimidation and Retaliation.** You may be worried that others will know you came forward and may retaliate against you. However, Circare wants its workforce to be able to speak openly about how work is conducted. Therefore, Circare prohibits Intimidation of and retaliation against any individual who participates in good faith in the Compliance Program. Specific areas of protection include, but are not limited to, seeking compliance advice, reporting a compliance issue, concern or violation, participating in a compliance investigation, self-evaluation, audit, or corrective action, and reporting to appropriate officials as allowed by New York State Labor Law §§ 740 and 741. Members of Circare’s workforce who are found to have engaged in intimidation or retaliation will be subject to disciplinary action up to and including termination from the workforce. If you report a compliance issue, concern, or violation in good faith, you will be protected from intimidation and retaliation.

**You Don’t Have to Give Your Name.** If you decide to report a concern anonymously (that is, without giving your name) via EthicsPoint, please be sure to provide as many details as possible. Without details, it is often difficult to investigate. Even if you chose to report a concern anonymously, we still need to know who, what, when, where, why, and how.

### Avenues for reporting compliance issues, concerns, or violations or seeking clarification about the Compliance Program

<b>Any Supervisor</b>	<b>Circare Compliance Officer</b> Richard Hughes 315.472.7363 x286	<b>Circare Executive Director</b> Scott Ebner 315.472.7363 x145	<b>Circare Board of Directors</b> President Stacey Keefe 315.415.9091	<b>EthicsPoint</b> 844.241.6860 <a href="http://circare.ethicspoint.com">circare.ethicspoint.com</a> <i>Anonymous &amp; Confidential</i>
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*The New York State Office of the Medicaid Inspector General (OMIG) also maintains a hotline for reporting fraud, waste, and abuse: 1.877.873.7283. Reports of fraud, waste, or abuse may also be filed electronically at the OMIG website: [www.omig.ny.gov](http://www.omig.ny.gov)*

## Meeting the Challenge of a Regulated Environment

Healthcare is one of the most heavily regulated sectors of the U.S. economy. We are committed to following the many laws and regulations that affect our daily work. These laws and regulations address a wide range of activities. They affect how we deliver and document client care and how we bill for services. They also require that members of the workforce have the proper credentials and licenses to perform their jobs. We must also provide documentation of our work to outside agencies that conduct audits and inspections.

### **We Cooperate with Regulatory Site Visits and Reviews.**

Any of these agencies may conduct on-site visits or ask us for documentation. Often, we do not know when the agencies are going to come on-site or ask for documents. Staff from regulatory agencies may visit you at work or ask for information by phone or mail. When this happens, you should immediately notify the appropriate program or department supervisor. Staff in those areas will coordinate responses or designate others who will. Talk with your supervisor if you are not sure where to direct the request.

Our responses to regulatory agencies must be truthful and open; you should never lie or make misleading statements during a site visit or review. You should never hide, destroy, or alter any documents during an inspection or audit by one of these agencies. Violations can subject

Circare and those involved in the violation to significant fines as well as criminal penalties.

If you are presented with a subpoena or search warrant, contact the Executive Director immediately.

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## How We Care for Our Clients

Our belief in the importance of providing the highest quality care is central to our mission. It is what drives our commitment to clients' rights, clients' privacy, and access to care.

**We Respect Our Clients Rights.** We are committed to treating all of our clients with dignity and respect. This means recognizing that each client has his or her own personal values, beliefs, and choices. Respect for clients' rights includes involving clients and their support systems in decisions about their care. Obtaining proper consent for and recognizing the rights of those designated by our clients to make decisions on their behalf are also things we do to protect clients' rights.

**We Seek to Do Better, Always.** Our commitment to excellence in care includes a dedication to ensuring that clients are safe. We continuously work to improve the quality of care we provide.

**We Learn from Our Mistakes.** When mistakes happen or nearly happen, we want to learn from them. We believe open discussion of the issues that affect safety will lead to creative solutions that help to prevent problems in the future.

**We Protect the Privacy of Our Clients' Health Information.** Our privacy policies are designed to ensure that access to client information is provided only to those who have a right to this information. You should access client health

information only when you need this information to perform your job.

- ▶ Client information should only be shared with individuals or organizations that are authorized to have it.
- ▶ Always follow procedures when faxing, mailing, or e-mailing data outside of Circare. This helps to keep client information secure and safe.
- ▶ You should not talk about clients in public areas where private information may be overheard by others.
- ▶ Never share passwords, and always log off computer applications that contain client or other sensitive information.

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### Report Improper Disclosure of Protected Health Information

<b>Circare Privacy Officer</b> Danielle Tongue 315.472.7363 X231	<b>EthicsPoint</b> 844.241.6860 <a href="mailto:circare.ethicspoint.com">circare.ethicspoint.com</a> <i>Anonymous &amp; Confidential</i>
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**We Accept Only Limited Gifts from Clients.** Many clients are grateful for the care and service that we provide. Some want to express their appreciation by offering us gifts. Although we respect and appreciate clients' gratitude, gift-giving can be misinterpreted. It is sometimes allowable to accept a modest gift, but valuable gifts or gifts in cash may never be accepted.

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## How We Treat Our Workforce

Our workforce is our greatest asset. We recognize that every individual makes an important contribution to our mission and to our success. All members of our workforce must be treated respectfully and professionally, at all times. We seek to foster each individual's professional development. Our recruitment and talent management activities are focused on individual performance and merit.

**We Expect the Best from You.** We expect everyone at Circare to behave in a professional and cooperative manner while at work or involved in Circare business. Holding everyone to this high standard helps us to provide the best possible care to our clients. It also helps us to protect the

rights, health, and safety of fellow members of our workforce and visitors.

**We Are Committed to Equal Opportunity.** It is Circare's policy to provide equal opportunity to all members of its workforce and applicants for employment. This means we do not discriminate based on a person's race, color, creed, religion, gender, age, national origin, marital status, citizenship status, disability, veteran status, sexual orientation, gender identity, predisposing genetic characteristics, domestic violence victim status, or any other legally protected status..

**We Do Not Tolerate Harassment or Discrimination in the Workplace.** We are committed to a work environment in which all individuals are treated with respect and dignity. Everyone has the right to work in a professional atmosphere free from harassment and discrimination. Work relationships among members of the workforce and between members of the workforce and persons outside of Circare should be businesslike and free of harassment and discrimination. If you feel you are being harassed or discriminated against in the workplace, you should report the behavior.

**Avenues for Reporting**

<p><b>Circare</b>  <b>Director of Human Resources</b>          Laurie Ludlow          315.472.7363          x101</p>	<p><b>EthicsPoint</b>          844.241.6860  <a href="http://circare.ethicspoint.com">circare.ethicspoint.com</a>  <i>Anonymous &amp;          Confidential</i></p>
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**We Conduct Background Checks.** Circare will use due care not to include individuals in its workforce who are considered excluded or otherwise ineligible to work in federal or state healthcare programs.

Circare uses a service to check government databases and confirm whether proposed members of its direct workforce — agency, state, contract, and temporary employees, Board of Directors, interns, and volunteers — have been excluded. We do this because our policies prohibit us from including individuals in our workforce who have been excluded. Circare will also comply with requirements set forth under state law with respect to background checks and appropriate screening activities as those requirements apply to the agency’s workforce.

Circare also uses a service to check government databases on a monthly basis to ensure that current members of its direct workforce have not been excluded. A member of Circare’s direct workforce who becomes excluded while working for or on behalf of Circare is subject to immediate termination from the workforce.

As a member of the Circare workforce, you must tell us if:

- ▶ you become excluded from any federal or state healthcare program (e.g., Medicare or Medicaid),
- ▶ a license or certification you hold and is required by the agency, by a regulatory authority, or by law to provide or bill for a service lapses, is suspended, or revoked, or
- ▶ you are convicted of a crime that negatively impacts the quality of client care, interferes with your ability to

perform your job duties, and/or negatively impacts the agency.

**We Work Together to Ensure Everyone’s Health and Safety.** We follow all health and safety policies and procedures in order to maintain a physical environment free of hazard. This also reduces the risk of injury to clients, our workforce, and visitors, and it protects Circare property. Circare follows all federal, state, and city safety and environmental protection regulations. In order to protect our workforce and our clients, we also provide special training in:

- ▶ handling and storing hazardous materials,
- ▶ disposing of hazardous wastes,
- ▶ fire prevention, and
- ▶ response to accidents and emergencies.

It is important that everyone exercise good judgment and act to prevent accidents and injury.

**We Are a Drug-Free Workplace.** Circare prohibits the unauthorized manufacture, possession, use, sale, and distribution of drugs in the workplace. Circare also prohibits workforce members from being under the influence of alcohol, any illegal drug, or any non-prescribed controlled substance while at work or conducting business as a representative of Circare. Members of Circare’s direct workforce with substance abuse problems can find help through Circare’s Employee Assistance Program. If you or another member of the workforce shows signs or symptoms of illness or impairment, you should notify your supervisor, Human Resources, or make a report via EthicsPoint.

**We Are a Violence-Free Workplace.** We do not tolerate any aggression or violence on Circare premises or by anyone working with or on behalf of Circare. If you see someone being violent or threatening, you must report it immediately to a supervisor or someone in a higher position of authority. This includes someone who is being disruptive or aggressive.

**Circare Resources Are for Circare Business.** Circare’s resources are to be used for Circare business purposes only. These resources include time, materials, supplies, equipment, and information. As a general rule, the personal use of Circare resources is prohibited. You should report known or suspected misuse or theft of Circare resources to a supervisor, the Compliance Officer, or make a report via EthicsPoint.

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## How We Work With Industry

Our work with industry provides many benefits to society. It helps to transform the healthcare delivery system and improves client care. We are committed to these relationships because they offer positive benefits. However, we are also committed to ensuring that these relationships do not compromise our clinical judgment or influence business activities.

**We Actively Manage Conflicts of Interest.** Circare encourages its workforce to participate in activities outside of the agency that:

- ▶ further our mission, and
- ▶ provide productive collaborations.

At the same time, these activities can create conflicts of interest that may compromise — or appear to compromise — our work.

We require our workforce to disclose those outside activities that may create conflicts of interests in order to safeguard the integrity and objectivity of our:

- ▶ clinical judgment, and
- ▶ business decision-making.

**We Conduct Exclusion Screening.** We will verify that entities and businesses that provide and/or perform a service for the agency have not been the subject of adverse governmental actions and/or excluded from federal or state healthcare programs.

**We Limit Our Acceptance of Business Courtesies.** In general, our workforce may not accept gifts or other business courtesies from industry. This rule is important because we do not want our relationships with industry to influence our purchasing decisions or our clinical objectivity. We do permit industry to participate in Circare events if the focus of these events is the educational and clinical work being done.

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## How We Conduct Business

We conduct our business with all outside organizations ethically and legally. We comply with all federal and state regulations. We always conduct our business in support of our mission. We regularly monitor and audit our business practices to ensure compliance with both internal and external standards and best practices.

**We Bill Accurately.** Our billing policies follow all federal and state regulations and private payer rules. We bill only for medically necessary services that have been provided and documented in clients' records. Accurate and timely billing supports client care and strengthens our clients' trust in us. We have programs to detect inaccuracies, and we correct any errors in a timely fashion. We do not misrepresent information provided for reimbursement, whether on claims or in other forms, in order to get around the billing rules.

**We Make Contracting and Purchasing Decisions Fairly.** We are committed to fair competition among prospective suppliers. We choose our vendors, contractors, and consultants based on objective criteria. These criteria include:

- ▶ quality,
- ▶ technical standards,
- ▶ price,
- ▶ ability to meet schedules, and
- ▶ the quality of service and support.

Members of the workforce who make purchasing decisions maintain the highest ethical standards when they negotiate, award contracts, and administer purchasing activities. All such decisions are made in ways that best serve our clinical mission. Circare will not knowingly enter into contracts with vendors, contractors, or consultants, who have been excluded from participation in any government healthcare programs.

**Our Financial Reporting Is Accurate and Complete.** We are accurate and complete when documenting and reporting our financial records. Our financial information conforms to generally accepted accounting principles. We manage outside vendors, contractors, and consultants to protect our financial integrity. We are careful to ensure that all transactions are correctly authorized and properly recorded. These activities help to maintain the accountability of Circare's assets.

**We Are Accurate, Truthful, and Candid in Our Development and Fundraising Activities.** We are committed to following all rules and regulations governing charitable fundraising.

**Our Marketing and Advertising Are Truthful and Accurate.** Our marketing practices are conducted with truth, accuracy, fairness, and a commitment to safeguarding the privacy of

our clients and the integrity of the agency. Our marketing activities are designed to:

- ▶ educate the public,
- ▶ provide information to the community,
- ▶ increase awareness of our services, and
- ▶ recruit new members to our workforce.

We are honest and truthful about our services, capabilities, and healthcare outcomes in our marketing and advertising activities and materials. We do not make guarantees or promises about services or results.

**We Do Not Make Endorsements.** Circare and its workforce do not express support for or endorse products or commercial ventures. This includes vendors with whom we do business. Requests or proposals to use Circare's name, logo, or likeness for an endorsement must be reviewed and approved by the Executive Director.

**We Observe Antitrust Laws.** Antitrust laws are designed to preserve fair market competition. Antitrust laws do this by limiting the information that may be shared among and used by competitors. Circare's competitors include other healthcare organizations that offer similar services in the same markets used by Circare. Antitrust laws prohibit sharing information among competitors that might result in:

- ▶ price fixing,
- ▶ allocation of markets among competitors, or
- ▶ boycotting of other entities and suppliers.

Contact the Executive Director if you have questions about what information can be shared with other organizations.

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## Rules of Conduct

We believe that certain rules of conduct must be observed to promote a positive and ethical work environment and pledge to abide by applicable laws, rules, regulations, standards, and Circare policies and procedures, including, but not limited to those related to the Compliance Program.

As individuals working for and on behalf of Circare, each member of the Circare direct workforce has the added responsibility to follow specific rules of conduct, as described below:

- To work collaboratively, cooperatively, and respectfully with all members of the Circare workforce and Board of Directors to provide the highest quality of services.
- To respect the role of the Board of Directors and management and to fully implement their decisions.
- To refrain from actively or passively subverting the attainment of the agency's legitimate and ethical objectives.
- To represent Circare positively in the community at large.
- To refrain from engaging in or supporting any activity that would discredit Circare.
- To perform one's duties in accordance with relevant laws, rules, regulations, standards, and policies.
- To represent the interests of all clients served and not favor special interests inside or outside Circare.
- To work in accordance with applicable laws, rules, regulations, standards, and Circare policies and procedures.
- To refrain from violating any criminal or civil law or regulation.
- To seek training and assistance in areas that would strengthen one's ability to fulfill responsibilities to clients and the agency.
- To conduct all business activities in a financially responsible manner.
- To conserve resources of the agency by not engaging in wasteful behavior.
- To complete tasks in a timely manner and meet expectations for the consistent quality of work that Circare strives to achieve.
- To document the delivery of services honestly and correctly and to bill accurately for the exact and medically necessary services that were actually provided.
- To report and record all information honestly and accurately.
- To preserve the integrity, completeness and accuracy of all financial and other information and records of the agency.
- To treat confidentially all information related to Circare and its clients, unless legally obligated to do otherwise.
- To refrain from using or appearing to use confidential information acquired in the course of one's work for or on behalf of Circare for unethical or illegal advantage either personally or through third parties.
- To respect the privacy of clients, members of the Circare workforce, and the Board of Directors.
- To report to the Compliance Officer any affiliations (personal, family, friend, or other) with organizations/persons that may benefit financially from business agreements/purchases (including service



dollars) made by Circare when one's role in the agency provides direct control over or influence over purchase decisions and financial transactions between Circare and other parties. Obtain written approval from the Executive Director when such affiliations exist.

- To refrain from engaging in any activity that would prejudice one's ability or that of others working for or on behalf of Circare to carry out duties ethically.
- To refuse to give or accept any gift, favor, or hospitality that would influence or appear to influence one's actions or the actions of others.
- To refrain from utilizing any asset or resource of the agency in pursuit of personal financial gain.
- To refrain from utilizing one's affiliation with Circare in any manner that could jeopardize the agency's not-for-profit status.
- To seek input from the Corporate Compliance Officer, Executive Director, and/or the President of the Board of Directors if at any time it is unclear as to whether a particular issue should be considered to be a conflict of interest.
- To comply with the Compliance Program.
- To take all steps necessary to avoid participating in, encouraging, directing, facilitating, or permitting either actively or passively any behavior that violates the Compliance Program.
- To report, without hesitation, in good faith, and through an appropriate channel of communication any compliance issue, concern, or violation of which one becomes aware, even if one only suspects that a problem exists or has occurred.
- To consult Circare leadership when questions arise as to the conduct permitted under applicable laws, rules, regulations, standards, and policies, including the Corporate Compliance Program.
- To refrain from intimidating or retaliating against others for seeking compliance advice, reporting a compliance issue concern, or violation, participating in a compliance investigation, self-evaluation, audit, or corrective action, or reporting to appropriate officials as allowed by New York State Labor Law §§ 740 and 741.
- To refrain from intimidating or retaliating against others for reporting a harassment or discrimination concern.
- To comply with all Human Resources policies including the Sexual Harassment Prevention Policy.
- To cooperate fully and honestly in audits and investigations.
- To notify one's program or department supervisor, without hesitation, if a license or certification one holds and is required by the agency, by a regulatory

authority, or by law to provide or bill for a service lapses, is suspended, or revoked.

- To notify the Compliance Officer, without hesitation, if one becomes excluded or otherwise ineligible to work in a federal or state healthcare program.
- To notify Human Resources, without hesitation, if one is convicted of a crime that negatively impacts the quality of client care, interferes with one's ability to perform one's job duties, and/or negatively impacts the agency.

Non-compliance with the Compliance Program, including the Code of Conduct, and/or laws, rules, regulations, standards, and policies applicable to Circare business practices is a violation of the Compliance Program and will result in corrective and/or disciplinary action.