Catholic Charities Code of Conduct

Revised 8/25/2026

CATHOLIC CHARITIES
OF THE DIOCESE OF ALBANY

CODE OF CONDUCT

Approved by the Board of Trustees of Catholic Charities of the Diocese of Albany (CCDA)

Compliance-related requests or reports of concerns can be made to:

Compliance & HIPAA Privacy Officer:
Marissa Agosto
Phone: 518-453-6650
Email: Marissa.agosto@ccrcda.org

Ethics Help Line:
Phone: 1-866-662-1875
Email: Compliance@ccrcda.org

Chief Executive Officer (CEO):
Sister Betsy Van Deusen, CSJ
Phone: 518-453-6650

Our Mission

The mission of Catholic Charities is the foundation of the Corporate Compliance Program. The CCDA Corporate Compliance Plan and this Code of Conduct are part of CCDA Compliance Program.

Our Mission Statement

Catholic Charities, a ministry of the Diocese of Albany, is committed to active witness on behalf of the Scriptural values of mercy and justice.

Catholic Charities recognizes human need at all stages of life, responds to all persons regardless of race, creed or lifestyle, with special emphasis on the economically poor and vulnerable.

Catholic Charities serves and empowers persons in need, advocates for a just society, calls forth and collaborates with women and men of good will in fulfillment of its mission.

Principles and Values

The Church's social teaching is a rich treasure of wisdom about building a just society and living lives of holiness amidst the challenges of modern society. Catholic Charities' principles and values, outlined below, are rooted in these teachings.

Principles

Human Dignity: Catholic Charities affirms that each person is made in the image of God and has inherent dignity. Each person must be respected from conception to natural death. Each person is endowed with rights and duties. Catholic Charities affirms that each person served and engaged with our work will be held in great esteem and with great respect.

Common Good: Catholic Charities affirms that there is a universal destination of all created things that all persons have the right to access all that they need in order to reach their fulfillment and that all persons have the concurrent obligation to work for the rights of others as well.

Subsidiarity: Catholic Charities affirms that decisions should be made at the lowest possible level, should involve those who are capable of participation in decision-making, and who will be impacted by those decisions, and should empower those who are most in need. Concurrently, we commit to creating and renewing structures and institutions that provide assistance and aid, as required, appropriate and necessary. Catholic Charities, as members of the civic society, affirms that we should actively participate in the public discourse at both the national and local community level, seeking justice

for all, but especially for those who have no voice of their own. We affirm that we should both advocate and serve, advocating both for individuals and for just social structures.

Solidarity with the Poor: Catholic Charities affirms that the most poor and vulnerable persons and families have a special claim to our services and programs. Catholic Charities affirms that our staff and boards should engage those served to have representative voice in decisions impacting policies and programs. Accordingly, we affirm the need to create structures and processes for obtaining appropriate input from stakeholders. Catholic Charities commits to continue to be a voice with poor and vulnerable individuals and families in the public discourse.

Fundamental Values

Truth: Catholic Charities affirms that transparency and accountability will always be pursued in our communication and work. Catholic Charities affirms the truth of the intrinsic dignity and worth of the human person as a social being and will witness to our Catholic identity in fulfilling our roles in Church and in society.

Freedom: Catholic Charities affirms that we will always assist our clients, staff and volunteers to live in socially responsible freedom, to exercise their authentic autonomy in light of objective truth and to actualize their inherent potential as beings created in the image and likeness of God. Catholic Charities will respect and affirm the autonomy of each organization/entity with whom we are in relationship.

Justice: Catholic Charities affirms that it is a matter of justice that all clients have the right to self-actualization and to reach their potential as beings created in the image and likeness of God. Catholic Charities affirms that we will work to achieve greater justice in our communities through our social policy advocacy efforts – locally, nationally and internationally. Catholic Charities affirms that all contracts and agreements and all relationships with stakeholders will be based on norms of justice. Catholic Charities affirms that we will work to expand and maintain excellence in our membership, board, leadership positions and staff. Catholic Charities affirms that we will continue to work to help eradicate racism and prejudice within our own organizations and in society at large.

Love: Catholic Charities affirms that love – caritas – will be the chief identifying characteristic and element of our work and life.

CATHOLIC CHARITIES' COMMITMENT TO ETHICAL BEHAVIOR AND COMPLIANCE

As a person with a direct interest, involvement or partnership with CCDA, we expect you to have a commitment to ethical behaviors within this system of services. For this purpose we are providing you with this Code of Conduct, which was designed to offer all employees, members of the Board of Trustees, members of the Local Agency Boards of Directors, contractors, agents and other affected individuals with general direction when confronted with an ethical question. As needed, this Code of Conduct may make reference to other resources that more specifically outline expectations. Throughout this Code of Conduct, all stakeholders will be referred to as "Members" and the contents should be

considered by each member as it pertains to their role in the system of CCDA.

Ethical behavior is defined as decisions, choices and actions of a member or group within the organization that reflect the CCDA mission, the principles of Catholic Social Teaching, the Ethical and Religious Directives for Catholic Health Care Services issued by the United States Conference of Catholic Bishops, and that are in compliance with internal standards and procedures as well as Federal, State, and Local laws.

CCDA expects that every member:

- Commits themselves to ethical behavior;
- Receives,understands and acknowledges CCDA's Corporate Compliance Plan and Code of Conduct; and
- Participates in training on the Corporate Compliance Plan and the Code of Conduct upon beginning their relationship with CCDA and annually thereafter.

In order to uphold our commitment to Corporate Compliance and to the Code of Conduct, every member is responsible for:

- Completing required training;
- Understanding and performing all duties;
- Following the Code of Conduct, abiding by all CCDA standards and procedures as well as federal, state, and local laws, as well as contractual requirements and regulations.
- Being alert to any situation that could violate our standards, procedures or ethical conduct; and
- Reporting suspected violations, issues or concerns.

The members of CCDA have developed a set of guiding principles and related conduct that reflect who CCDA is and how every member of CCDA interacts with individuals served and with each other, as well as with the community at large.

CCDA is responsible for providing a safe and secure workplace and strives to ensure that all individuals associated with Catholic Charities are treated in a respectful and fair manner. Every member is expected to adhere to this Code of Conduct. Violations of the expected behavior may result in disciplinary action, or other corrective actions, up to and including termination of employment for employees. For contractors, subcontractor, agents and other affected individuals, violations of this Code of conduct may result in disciplinary action or other sanctions as outlined in the contract/agreement. For Agency Boards and Trustees, violations of this Code of Conduct may result in disciplinary action as outlined in CCDA bylaws.

This Code of Conduct and the CCDA Corporate Compliance Plan are designed to meet the requirements of various compliance laws and regulations including:

- NYS Medicaid Provider Compliance Programs: 18NYCRR Section 521.1 and Section 521.3
- Federal False Claims Act: 31 USC Sections 3729 – 3733
- NYS False Claims Act: NY State Finance Law, Article 13, Sections 187 – 194
- Deficit Reduction Act of 2005, Federal False Claims Obligation: 42 USC Section 1396a(a)(68)

GUIDING PRINCIPLES FOR ETHICAL BEHAVIOR

Provide quality services to those we are privileged to serve

CCDA responds to the needs of all persons who seek help regardless of race, creed, or lifestyle. High quality services reflect a person-centered approach which assists and empowers individuals to help themselves. This is done through member behaviors that protect those we serve as well as the members. These behaviors include, but are not limited to:

- Assisting and empowering individuals to support themselves to the extent they are capable;
- Embracing and respecting differences; by recognizing and respecting individual differences among our clients and community members.
- Using active listening skills;
- Advocating for the individuals served;
- Maintaining competency in the profession through learning and ongoing communication with others;
- Maintaining certification and credentials, where required;
- Full disclosure of exclusion from state and/or federal health care programs, including Medicaid and Medicare;
- Being conscious about personal values and how they influence professional decisions;
- Using best practices for service delivery;
- Maintaining boundaries;
- Actively participating in measuring and monitoring personal and program compliance and quality; and
- Preventing and reporting suspected child or vulnerable adult abuse, according to CCDA and oversight Agency guidance.

Create a professional workplace

CCDA is committed to creating a professional work place where all people are treated with respect. CCDA and its members welcome all people and work to engender respect within the Catholic Charities organization. CCDA and its members will treat others with respect and without regard to their race, sex, age, religion, national origin, color, marital status, disability, sexual orientation, military status, citizenship, gender identity, gender expression or other protected categories, under the NYS Article 15 Human Rights Law Section 296.

CCDA does not tolerate any type of harassment or discrimination. The organization is committed to providing a safe and healthy work environment. CCDA expects that all members will adhere to all applicable standards.

Foster a culture of open communication

The organization is committed to promoting a culture where all members and clients communicate clearly and honestly. As part of this commitment, clients will be given a clear explanation of the services they will receive.

CCDA encourages all members to openly address questions and issues regarding ethical behavior and other aspects of their

work by seeking guidance from a supervisor, Agency Executive Director or the system wide Compliance & HIPAA Privacy Officer. Issues and concerns regarding members, clients and/or service delivery will be addressed in a constructive manner.

Protect confidential information

CCDA values the protection of confidential information of the individuals served as well as its members and Agency information.

Conduct that helps to protect confidential information includes, but is not limited to:

- Respecting the privacy of all individuals served;
- Maintaining the confidentiality of program and Agency information;
- Following Agency and program guidance for sharing documentation and disclosure of confidential information;
- Following technology use policy and guidance to protect and secure electronic data;
- Fully complying with federal and state regulatory and statutory requirements regarding privacy, confidentiality and security of client and member personal and health information; and
- Following CCDA Confidentiality Standard and Procedure, and where applicable, the CCDA HIPAA Handbook.

Document truthfully and keep accurate records

Members are expected to record and report all client, organizational and financial information fully, accurately and honestly. The organization will maintain and dispose of records in accordance with CCDA Record Retention and Destruction Standard and Procedure and applicable contractual and regulatory requirements.

Use organization's assets properly and prevent theft

In order to ensure that CCDA can fulfill its mission, it is of highest importance that assets are used in the best way possible and that Agency operations are conducted in the most effective and efficient way. All members have a responsibility to the Agency and individuals we serve to work towards maximizing Agency assets and eliminating misuse and theft of Agency assets.

Members of the Board of Trustees and local Agency Board Members are responsible for fulfilling their due diligence responsibility regarding fiscal oversight. Agency Executive Directors and other management members are responsible for establishing and adhering to fiscal protocols that create systems of checks and balances. Employees, contractors, subcontractors and other affected individuals are responsible for operating within the established standards and procedures and for eliminating wasteful use of assets.

Conduct that protects CCDA's assets includes, but is not limited to:

- Establishing checks and balances to minimize possible errors in regard to billing and fiscal transactions; and
- Correctly documenting member-related expenses (e.g., time worked, mileage, time studies).

Conduct that is prohibited includes, but is not limited to, unauthorized use of:

- An Agency vehicle;
- Agency assets, including but not limited to:
    - Office supplies and equipment
    - Food from a residence or food pantry;
- Property, services or funds that belong to an individual served by an Agency of CCDA; and
- An Agency credit card.

Conflicts of interest

Conflict of Interest is defined in the CCDA Conflict of Interest Standard and Procedure as: Any situation in which financial or other personal considerations may compromise or appear to compromise (1) a member's business judgment; (2) delivery of services; or (3) ability of a member to do their job. An actual or potential conflict of interest occurs when a member is in a position to influence a decision that may result in a personal gain for that member or for a relative as a result of business dealings. Relative is defined as any person who is related by blood or marriage, or whose relations with the member are similar to that of persons who are related by blood or marriage.

All members of CCDA are expected to follow the expectations outlined in the CCDA Conflict of Interest Standard and Procedure.

Ensure ethical business practices

All members are expected to comply with ethical business practices when doing business with providers, contractors and competitors and in providing services. Members are prohibited from soliciting or accepting money, gifts, gratuities, free trips, honoraria, personal property or any other item of value or personal benefit or favors of any kind from providers, contractors, producers, vendors, accounts or from people we serve or their families in return for services. The receipt of token gifts of appreciation from families or individuals served having a nominal value not exceeding $25 is permitted as long as the gift is not a condition of receiving services.

Participate, when called upon to do so, in internal and government audits, surveys and investigations

CCDA is committed to continuously reviewing and monitoring program performance and compliance with legal, regulatory and contract requirements. This includes performing regular internal audits and monitoring visits to ensure that services are delivered and billed according to internal and external standards and regulations. CCDA and its members are committed to fully disclosing information requested by government surveyors, auditors and investigators in accordance with any applicable legal guidelines.

Adhere to proper conduct regarding educating the public about CCDA's mission of service to the poor and vulnerable

The organization is committed to educating the public on issues important to CCDA and its mission. This means CCDA may be meeting with and educating legislators, public officials and the general public concerning its mission of service to the poor and vulnerable.

When engaging in educational activities, members will not represent that they are acting or speaking on behalf of CCDA without prior approval from the Agency's leadership.

Adhere to proper conduct related to political participation

As a 501(c)(3) organization, CCDA's primary role is to provide services and support to those in need. To maintain this status, neither CCDA nor its members may engage in any substantial lobbying activities.

CCDA is not allowed to engage in any political campaign activity. Members who engage in such activity must make it clear that they are acting personally and not as a representative of CCDA and are prohibited from undertaking such activities at times during which they are being paid by CCDA or using any CCDA assets (paper, printers, etc.) to support such activities.

Seek guidance and communicate concerns

CCDA values each member's commitment to CCDA's mission and the Code of Conduct and expects all members to conduct themselves ethically and responsibly. If members are unclear whether their or their fellow members' decisions or actions are consistent with CCDA's mission, ethical behavior, the CCDA Code of Conduct, or other expectations outlined by CCDA, members should seek guidance and advice from their supervisor, Agency Executive Director or other appropriate CCDA members. Members are encouraged to apply the principle of: "If in doubt, seek guidance."

If a member becomes aware of or suspects behavior that is improper or unethical, the member is required to immediately communicate their concerns so that necessary steps can be taken. Members are encouraged to discuss their concerns with their supervisor or Agency Executive Director. If these options are not available for any reason, the Ethics Help Line is also available to voice concerns about potential unethical, illegal and unsafe actions. Reports can be made anonymously, if desired, by the member, following phone-provided guidance to hide the phone number prior to calling. Members may also communicate concerns to the Compliance & HIPAA Privacy Officer directly, either by phone, in writing, through email or by asking to meet in person.

All members are responsible to refuse to engage in illegal or unethical behaviors and to report ethical concerns, compliance violations and concerns of fraud, waste or abuse of Agency and government resources to the Compliance Officer.
It is not the responsibility of the member to determine if the reported concern constitutes an occurrence of unethical, illegal and/or unsafe behavior; it is simply the member's responsibility to communicate the concerns.

All persons communicating concerns are assured that such reports will be treated confidentially to the extent possible. This information will only be shared on a need to know basis or when required by law.

CCDA has a whistleblower policy in place, prohibiting CCDA members from any retaliation or intimidation of those who report concerns or participate in compliance audit/investigation efforts, including those who report concerns to government entities. CCDA will take no adverse action against persons making

such reports in good faith, persons participating in compliance audit/investigation and persons reporting compliance concerns to appropriate government entities. Reports of retaliatory actions will be thoroughly investigated and members engaging in intimidation or retaliation may be subject to disciplinary action or sanction.

Members are required to report compliance concerns. If information or knowledge of improper or unethical activities is withheld, it is a violation of this Code of Conduct. If such a violation is discovered, involved members may be subject to disciplinary action or sanction.

Contact the Ethics Helpline by:

Phone: 866-662-1875

Email: Compliance@ccrcda.org

The phone allows for anonymous reporting. Please refer to your phone provider's guidance if you want your phone number hidden/not displayed in your phone message.

ACKNOWLEDGEMENT OF RECEIPT OF
CATHOLIC CHARITIES CODE OF CONDUCT

As an employee or member of Catholic Charities of the Diocese of Albany, my signature below is acknowledgement that I have received and read the Code of Conduct, and I agree to abide by the standards, procedures and provisions described therein.

Name (Please Print): _____

Signature: _____

Date: _____