



Title: Code of Ethics and Conduct	
Review date(s): 4.15.2025; 11.14.2025	Approved by: Delphi Rise Board of Directors
Revised date(s): 11.14.2025	Policy Owner: Jennifer Cathy, President and CEO
Approved Date: December 8, 2025	Original Effective Date: April 15, 2025

Purpose

This Code of Ethics and Conduct outlines the principles, values, and expectations that guide the behavior and decisions of all Delphi Rise employees, interns, contractors, Board members, and volunteers (“Covered Persons”). It is intended to promote ethical and lawful conduct in accordance with Delphi Rise’s mission and in compliance with applicable federal and state laws and regulations, including requirements from the New York State Office of the Medicaid Inspector General (OMIG).

Scope

This policy is applicable to all affected individuals, which includes all persons who are affected by the risk areas of Delphi Rise including its employees, the chief executive, other senior administrators, managers, contractors, agents, subcontractors, independent contractors, governing body and corporate officers, collectively referred to herein as “affected individuals.”

Guiding Principles

Delphi Rise is committed to:

- Upholding the dignity, rights, and well-being of the people we serve
- Operating with honesty, integrity, and transparency
- Maintaining full compliance with laws, regulations, and ethical standards
- Promoting an environment of accountability, fairness, and respect

Compliance with Law and Regulations

All Covered Persons must:

- Comply with federal, state, and local laws, including those related to Medicaid, HIPAA, 42 CFR Part 2, and OASAS requirements
- Follow Delphi Rise policies and procedures, including those adopted under our Compliance Program
- Cooperate fully and honestly with internal or external audits, investigations, and reviews
- Immediately report known or suspected violations through appropriate channels

Medicaid Program Integrity

Consistent with OMIG guidelines, Covered Persons shall:

- Accurately and completely document all services rendered
- Submit only truthful and supported claims for reimbursement
- Protect Medicaid beneficiaries from fraud, abuse, or neglect
- Never offer or accept kickbacks or incentives for referrals
- Participate in ongoing compliance training and education

Conflict of Interest



Covered Persons must avoid conflicts of interest that may interfere with professional judgment or organizational integrity. This includes:

- Disclosing any financial interests or relationships that may influence decision-making
- Not using their position at Delphi Rise for personal gain
- Completing an annual Conflict of Interest disclosure and updating it as needed

Confidentiality and Privacy

Covered Persons must:

- Protect the confidentiality of all client and employee information
- Adhere to all applicable privacy laws, including HIPAA and 42 CFR Part 2
- Access confidential information only as necessary for job duties
- Never share confidential information with unauthorized persons

Workplace Conduct and Professionalism

All interactions should be rooted in respect, cultural humility, and integrity. Covered Persons must:

- Treat colleagues, clients, and community partners with dignity and care
- Refrain from any form of discrimination, harassment, or retaliation
- Maintain professional boundaries with clients and their families
- Use organizational resources responsibly and only for official business

Reporting Misconduct

Delphi Rise encourages a culture of openness and accountability. Covered Persons are expected to:

- Report concerns or violations to a supervisor, the Compliance Officer, or via anonymous reporting channels
- Cooperate in investigations
- Understand that retaliation against anyone who makes a good faith report is strictly prohibited

Enforcement and Disciplinary Action

Violations of this Code may result in disciplinary action, up to and including termination, removal from the Board, or termination of contracts. Legal or regulatory violations may also be referred to appropriate authorities.

Acknowledgement and Training

All Covered Persons are required to:

- Receive a copy of this Code upon hire or engagement
- Participate in annual compliance and ethics training
- Sign an acknowledgment form affirming understanding and commitment to this Code

Review

This policy will be reviewed at least annually, or sooner if required due to changes in laws, regulations, payer requirements, or organizational needs. The Compliance Officer, in collaboration with Senior Leadership, is responsible for coordinating the review and ensuring required approvals.