



CORPORATE COMPLIANCE PROGRAM

CHINESE-AMERICAN PLANNING COUNCIL HOME ATTENDANT PROGRAM



Chinese-American Planning Council
Home Attendant Program
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CHINESE-AMERICAN PLANNING COUNCIL HOME ATTENDANT PROGRAM

INTRODUCTION TO THE CORPORATE COMPLIANCE PROGRAM

COMPLIANCE VISION

Chinese-American Planning Home Attendant Program (CPCHAP) is a leading provider of home health care services throughout New York City. CPCHAP's philosophy includes the provision of quality home care services to a diverse population of individuals residing throughout New York City. We believe patients and consumers should be serviced by an organization that provides compassionate and quality care and whose processes and procedures ensure that staff at all levels operate in a legal and ethical manner.

Our passion to provide the above described services while further ensuring that violations of legal and ethical practices are detected is the focal point of Chinese-American Planning Council Home Attendant Program in creating this Corporate Compliance Program (CCP) and continuously updating and enhancing the procedures that govern the CCP.

We must ensure that all our business practices and operations are carried out in a legal and ethical manner while our quality care is provided with the highest level of integrity. In order to achieve this goal, CPCHAP adheres to the guidelines set forth in this robust Corporate Compliance Program designed to ensure staff at all levels perform their job responsibilities to the letter and spirit of the law. We must all ensure that CPCHAP operates within all guidelines and regulations set forth in our contractual agreements, organizational policies and procedures as well as adherence to Federal, State and Local laws. Many of the procedures contained in the CCP are related to existing policies and procedures contained within the operations of the Company. If there is an inconsistency between the Company policy and this Program, the Corporate Compliance Program will supersede the policy.

All Company employees, at all levels, will be held accountable for understanding the CCP and fully carrying out all responsibilities associated with the Program. The Corporate Compliance Program is a means in which all paraprofessional staff as well as administrative staff at all levels can report situations that may violate Company policy, Federal, State or City law, ethical behavior or health care regulations. All employees are expected and required to report any of the above situations as soon as they are made aware of the situation.

PURPOSE AND OVERVIEW

Chinese-American Planning Council Home Attendant Program is committed to ensuring that its business operations function in accordance with all Federal, State, City laws and regulations governing the provision of home health care services. To that end, our Corporate Compliance Program offers a means for all employees to know what is expected of them and how to function in their position while maintaining the highest level of integrity during the performance of all business transactions and ensuring the highest level of care and safety to our clients and consumers as possible. Every employee is an important player on our team who is dedicated to providing high quality services. Any employee who does not adhere to this Corporate Compliance Program will be disciplined up to and including possible termination from their employment.

The Corporate Compliance Program illustrates to all Company employees that their actions on the job should always adhere to the requirements set forth in this Program and that their actions off the job should always be legal, ethical and of the highest integrity. Failure to perform your job duties in accordance with this compliance program, within the guidelines of the agency's policies and procedures as well as not behaving in a legal and ethical manner off the job will result in disciplinary action up to and including termination.

This Program's standards cannot describe every situation that employees may come across, but ethical behavior should be a driving force for all transactions initiated by the Company and employee activities. Ethical behavior includes sound judgement, honesty and a high level of integrity while avoiding illegal actions. The Company and its employees must ensure that the individuals or companies that the organization does business with also conduct their business transactions in a manner that is consistent with CPCHAP's Corporate Compliance Program. If any employee is unsure of how to handle or has questions regarding a perceived ethical situation, he or she should consult an immediate supervisor, Corporate Compliance Officer or any member of the Corporate Compliance Committee, which is described in detail below.

Finally, this Corporate Compliance Program puts forth guidelines contained in federal and state laws such as the Civil False Claims Act and the Deficit Reduction Act that helps to detect and prevent fraud, waste and abuse. This Program provides a means in which to report any unethical behavior or potential violations of the Corporate Compliance Program aimed at adhering to the False Claims Act while detecting fraud, waste and abuse.

POLICIES GOVERNING THIS CORPORATE COMPLIANCE PROGRAM

- All employees are expected to successfully function in their position within the Company while adhering to the requirements set forth in this Corporate Compliance Program.
- All employees are charged with the responsibility of ensuring they report any violation or perceived violation of the Corporate Compliance Program.
- No employee is to present fraudulent documentation of any kind. The submission of any information known to be false or inaccurate is considered fraud and will not be tolerated. The submission of known false information will result in a full investigation and can result in termination.
- It is the policy of CPCHAP to encourage all employees to report any violation or perceived violation because we want to know about the violation so we can correct the violation and put additional measures in place to reduce the risk of a similar violation occurring in the future.
- Any employee who reports a violation will not be disciplined or retaliated against due to the reporting of the violation and will be protected against any reprisal in accordance with Whistleblower's Protection Act.
- CPCHAP will periodically conduct self-evaluations to determine risk factors and put processes in place, as may be needed to lower or eliminate the risk.
- Train and educate all employees, executives and Board members to this Corporate Compliance Program upon hire/appointment and annually thereafter.
- Employees must conduct themselves in a legal and ethical manner both on the job and off the job.
- Applicants will be screened to ensure they possess the appropriate credentials for their respective job function as applicable.
- Applicants will be screened through a database that will provide CPCHAP with any and all instances in which the potential employee was arrested.

REPORTING RESPONSIBILITIES and METHODS

It is the responsibility of all staff at all levels to report a violation or perceived violation of this Corporate Compliance Program. The individual wishing to report a violation is free to call the Company's Corporate Compliance Officer, our Confidential Corporate Compliance telephone hotline or any member of the Corporate Compliance Committee as listed below.

John Sullivan, Chief Operating Officer/Corporate Compliance Officer – (212) 219-8100 Extension 111

Confidential Hotline – (844) 479-8663 or at <http://cpchap.ethicspoint.com>

Sheridan Chu, Board Member – (646) 206-8138

Charles Do, Board Member – (502) 608-5992

Wayne Ho, Chief Executive Officer (CEO) - (212) 941-0920 Extension 143

Ling Ma, Chief Program Officer (CPO) – (212) 219-8100 Extension 129

John Sullivan, Chief Operating Officer (COO)/Corporate Compliance Officer (CCO) – (212) 219-8100 Extension 111

Alan Gerson, Legal Counsel – (212) 941-0920 Ext. 158

Elaine Ouyang, Paralegal – (212) 941-0920

Please note that our Confidential Hotline is an independent Company not connected with CPCHAP and is staffed with live operators who will record each perceived violation that is reported. When reporting a violation, it is recommended and preferred that a caller provide contact information but the caller may report a violation anonymously if they so desire. If anonymity is the preference, please provide as many details and facts as possible because anonymity will result in an inability to contact the caller for additional information or questions that may arise during the investigation. Written reports of each call received will be confidentially forwarded to the Corporate Compliance Officer who will follow-up and appropriately address each call received. All reports of a violation will be kept as confidential as possible. **No one will be disciplined or punished in any way for appropriately using the confidential hotline. Please remember this hotline is only to be used for Corporate Compliance issues and not general complaints that should be addressed by your immediate Supervisor or other appropriate administrative staff.**

If the perceived violation involves the Corporate Compliance Officer either directly or indirectly, the reporter should contact the CEO directly at the telephone number listed above.

CORPORATE COMPLIANCE OFFICER

The Board of Directors of Chinese-American Planning Council Home Attendant Program has voted to designate its Chief Operating Officer as the organization's Corporate Compliance Officer (CCO) at their May 15, 2018 Board meeting. The CCO reports directly to the Chief Executive Officer and has access to all members of the Corporate Compliance Committee as well as the Board of Directors. General duties of the Corporate Compliance Officer are as follows, but not limited to:

- Oversees and administers the Corporate Compliance Program.
- Ensures that all reported violations are recorded, investigated and appropriately addressed.
- The Corporate Compliance Officer will oversee and/or participate in any disciplinary matters that result from any employee's suspected or actual violation of the Corporate Compliance Program.
- The Corporate Compliance Officer will also keep abreast of any changes and enhancements that need to be implemented into CPCHAP's business operations for continued compliance.
- Ensure that periodic audits occur within departments that may involve proper credentialing of certain employees, billing for services and payments to employees as well as ensuring new/existing employees, physicians and vendors are screened through CPCHAP staff reviewing Exclusion Lists. These audits are designed to further reduce the possibility of systemic issues that may compromise the integrity of the Company operations.
- In consultation with Department Head, determine appropriate remediation to address identified systemic problems detected through periodic internal audits and any disciplinary action needed to be taken against employees responsible for the systemic problem.
- Corporate Compliance Officer will follow-up on each Exclusion List match to ensure appropriate follow-up is conducted and the Corporate Compliance Committee is notified of the Exclusion List match.
- Report any and all findings and issues related to the Corporate Compliance Program to the Corporate Compliance Committee.
- Ensures those providing the training on CPCHAP's Corporate Compliance Program emphasizes and stresses to all employees the importance of reporting any and all instances in which they feel the Program has been violated while they also understand the non-retaliation policy and its strict enforcement.

CPCHAP wants all employees to freely report any perceived violations in accordance with any of the above methods without fear of retaliation, reprisal or disciplinary action because we want to know about alleged violations and CPCHAP adheres to all laws regarding non-retaliation and reprisal as described in the Whistleblower Protection Act. Therefore, no employee who reports a violation will be subjected to reprisal or retaliation of any kind by any employee. If any retaliation is discovered, the individual responsible for the retaliation will be terminated from employment.

CORPORATE COMPLIANCE COMMITTEE

The Corporate Compliance Program includes a committee known as the Corporate Compliance Committee, who is approved by the Board of Directors to oversee the Corporate Compliance Program. Currently, the Committee members, as specifically stated above, are two Board Members, Chief Executive Officer, Chief Program Officer, Chief Operating Officer/Corporate Compliance Officer, and the Company's legal counsel as well as a Paralegal from CPC's legal department .

The Corporate Compliance Committee will meet on a quarterly basis to review all Corporate Compliance issues reported during the prior quarter. The meeting must have a quorum of at least four members to be considered a valid meeting in which the Committee can exercise actions necessary for overseeing the Corporate Compliance Program. Presence at the meeting can be in person or via a telephone conference call. The Corporate Compliance Officer will lead the meeting by creating an agenda and providing appropriate documentation related to each of the compliance issues reported during the prior quarter. Minutes will be taken and maintained by the CCO in a confidential manner. The committee will decide if each compliance issue was fully and appropriately addressed or if further action is warranted. The Committee is also able to receive written or verbal alleged violations of the Program, decides on all actions to be taken when a conflict of interest is presented. The Corporate Compliance Committee will be informed by the Corporate Compliance Officer of any new compliance initiatives and policies and processes that may need to be enhanced to ensure on-going compliance within CPCHAP's Corporate Compliance Program and its business operations. The Committee will ensure that CPCHAP completes the annual self-certification required to be done by the CCO each December in accordance with the mandate set by New York State Office of the Medicaid Inspector General (OMIG).

EMPLOYEE RESPONSIBILITIES AND STANDARDS OF CONDUCT

- All employees of the Company must use sound judgement and the highest level of integrity in initiating business transactions and maintaining business relationships.
- All employees must avoid situations that are contrary to CPCHAP's philosophy and the content of its Corporate Compliance Program.
- Employees shall not offer, solicit, pay or accept anything of value in exchange for referrals. This applies to offering or receiving any money, gifts, free or discounted items or services or other arrangements with the intent to induce referrals.
- Employees may not use CPCHAP-owned materials, equipment, and facilities for their own personal use unless authorized to do so by a member of the management team.
- No employee may make a statement on behalf of management or the Company unless specifically authorized to do so in advance. CPCHAP's name is not to be used to promote, support, advance or oppose any program, policy, statement, matter or interest without prior authorization from management.
- Employees may not realize personal gain from employment with the Company other than the salary and benefits paid by CPCHAP. Unethical or questionable practices for additional personal gain, of any kind, will not be tolerated. Employees engaging in such actions will be subject to disciplinary action up to and including termination.
- Employees will not misuse or steal the personal property of the patients they service. An employee wrongfully taking property from a patient will be terminated immediately. The Company may, in its sole discretion, refer the matter to the police for criminal prosecution.
- No solicitations of any kind are permitted on Company premises.
- Employees involved in financial transactions must ensure they are handled honestly and recorded accurately. All disbursements of funds and all receipts of monies must be properly and promptly recorded. No unrecorded or general funds may be established. No false or artificial statements or entries may be made in Company books or records.
- In accordance with the Whistleblower's Protection Act, no employee will be retaliated against or be the victim of any retribution for reporting a violation perceived violation of this Corporate Compliance Program.

- Any individual who knows of a violation and does not report it, will be disciplined up to and including termination.
- Any employee found to be participating, encouraging or facilitating behavior contrary to this compliance program will be disciplined up to and including termination.
- CPCHAP will not tolerate discrimination based on gender, race color, creed, national origin, sexual orientation, age, handicap, disability or veteran's status. Employees will be immediately terminated if found to discriminate.
- CPCHAP will not tolerate any type of harassment in the workplace by any employee. Incidents of this nature will be immediately forwarded to the Corporate Compliance Officer for further review and action.

STANDARDS OF THE CORPORATE COMPLIANCE PROGRAM

Chinese-American Planning Council Home Attendant Program fully complies with the laws and regulations governing its operations. In order to achieve this goal, all employees must function within the requirements of their job responsibilities including adhering to this Program as well as policies issued by CPCHAP and all federal, state and local laws.

Any known violation of law, regulation, or other regulatory requirement of the Company's operations, must be reported to the Corporate Compliance Officer, our confidential hotline or a member of the Corporate Compliance Committee. This applies to all employees or customers, vendors, contractors or any entity whose improper actions may affect the continued successful operation of CPCHAP.

Any employee who is arrested or convicted of any violation of any local, state or federal criminal law can, in the sole discretion of CPCHAP be dismissed from employment. In addition, no person may be employed by CPCHAP if that person has been excluded from participation in the Medicaid or other federal health funding programs. It is the obligation of all employees to inform the Corporate Compliance Officer or any member of the Corporate Compliance Committee that they are aware of an employee who has been excluded or entity that does business with CPCHAP. If a person is excluded while employed by CPCHAP, he or she will be dismissed from employment. CPCHAP will contact any recipient's contract and request a termination of our services if the patient/consumer or any individual or entity providing services related to the receipt of Medicaid reimbursed home care is found to be on any Medicaid exclusion listing.

The Company must ensure accuracy in submitting bills to any payor, whether governmental, insurance company or any other payor. Claims reimbursed directly under the Medicaid program will be scrutinized to ensure there is no circumstance suggesting there may have been an overpayment. If any circumstance of an overpayment exists, CPCHAP will promptly look further into this circumstance to resolve the concern. If an overpayment is detected, CPCHAP will follow mandated standards of notification and repayment within 60 calendar days of discovery.

Over payments are of a special concern as they can create areas of risk such as:

- Billing for services not actually performed
- Billing for services not medically necessary
- Duplicate billing
- False cost reports
- Any credit balance due to failing to appropriately refund for any duplicate billing payment received
- Knowingly bill for inadequate or substandard care
- Insufficient documentation that services were performed
- Billing for services by improperly credentialed individuals
- False dating or forged signatures on any document
- Improper patient solicitation
- Discriminatory admission, discharge or abandonment of patient violating laws, regulations and statutes.

Company policy as well as federal and state laws require that all reports, records and other documents be prepared carefully and accurately, and that they truly reflect the actual services performed, and the hours and dates actually worked. This especially applies to conducting nursing visits, supervising paraprofessional staff, the care provided to patients, and office and field employee's time records. This is particularly important for the manual/electronic duty sheets/task activity report completed and submitted because the duty sheet/task activity report documents the care rendered to the patient and serves as the basis for billing for those services. Duty sheets/task activity reports should accurately describe the work done and the actual hours each employee worked during each and every assignment.

Any and all manual time records used by CPCHAP must be completed and signed only by the individual who performed the services and the individual who received the service. The employee's or Personal Assistant's signature on any time record means that the duty/time sheet honestly reflects the hours worked and for patients the care performed. No false record may be made of patient or consumer services received, nursing visits or the supervision of the Company's HHA, PCA and nursing staff. False information on any document can endanger the Company's ability to continue to provide services under that contact and possibly make Medicaid reimbursement unavailable. Under the False Claims Act, any individual who intentionally submits a duty sheet or other time record that falsely reflects the hours worked or services performed can be prosecuted and suffer severe consequences. Such actions may be punished under federal, state and local law. The same is true if an aide or field nurse signs and submits any information that is known to be wrong or without Company approval.

Any employee who intentionally completes and submits a duty sheet, time record or any other documentation which contains false information of any kind can be terminated for violating CPCHAP's policy and the requirements set forth in this Program. The Company also may seek to have the employee prosecuted to the fullest extent of the law. Any employee who becomes aware of any such wrongful practices must immediately report the matter to the Corporate Compliance Officer or a member of the Corporate Compliance Committee.

If an employee unintentionally or carelessly submits a duty sheet that is missing necessary information, contains an error or is otherwise incorrectly completed must submit a corrected duty sheet or must be accompanied with documentation/notes to show how each problem or mistake on the duty sheet was resolved.

PRIVACY AND CONFIDENTIALITY

All staff at CPCHAP shall maintain the confidentiality of patient's and consumer's protected health information as required by Company policies and procedures and applicable law, including but not limited to the Health Insurance Portability and Accountability Act (HIPAA). Staff should not access patient or consumer information unless they have a need to access the information because of their job duties.

Disclosure of confidential patient, consumer or family information to any other person or entity not involved in the care or payment arrangements or on the evaluation of the quality of the care afforded by the Company is not permitted without the written consent of the patient, consumer or family. Employees must maintain the confidentiality of documents and use discretion in patient or consumer-related discussions around other people. Documents with sensitive patient or consumer information should be handled carefully during work hours and must be properly secured at the end of the business day (both paper and computer). Computer terminals containing confidential information should not be left unattended or on at the end of the business day. Employees must immediately notify their supervisor of any unapproved disclosure of confidential information because the Company must take further action under the law.

To the extent feasible and allowed by law, staff shall maintain the confidentiality of communications and records containing confidential information concerning co-workers, communications and records relating to Company confidential financial or business operations, trade secrets, branding strategies.

Any employee who releases or divulges patient or consumer information or Company confidential information

may be subject to immediate termination. Depending on the circumstances, the individual may be subject to civil and/or criminal sanctions. Any Company employee who becomes aware of unauthorized disclosure of information must report their awareness immediately to the Corporate Compliance Officer or a member of the Corporate Compliance Committee.

GOVERNMENT BUSINESS

Government-funded programs have strict requirements and is a significant part of CPCHAP's business revenue. The Company must provide financial information about its costs and revenue to governmental entities, which may affect the government's rate setting methodology for reimbursement of expenses. Therefore, all Company financial documents or information pertaining to cost and expenses must be carefully and accurately prepared. Duty sheets must never knowingly contain any false, misleading or inaccurate information or misrepresentations. These duty sheets are open to auditing by government officials and must be reviewed for absolute accuracy.

Certain employees are required by law to have certain credentials, or be accredited or certified as trained to perform personal care. The Company will take appropriate steps to validate such credentials to ensure billing for services is justified and appropriate.

The intentional submission of false or misleading information to government-funded programs such as Medicaid, is a serious crime under both federal and state law. Such wrongful actions expose the person or persons actually involved to arrest and criminal prosecution. Intentionally submitting false information by an employee(s) can also result in CPCHAP not being able to continue providing Medicaid services under a government contract. If this event were to happen, CPCHAP would suffer extremely harsh consequences up to and including termination of its business. Therefore, all personnel will strictly comply with all government rules and regulations, and all financial documents related to costs and expenses submitted to governmental entities will be accurate and complete. All employees will report errors observed immediately to their supervisor and or the Corporate Compliance Officer.

CPCHAP is also committed to ensuring that all procurement processes it is involved with under government contracts, will be carried out with the highest level of integrity. CPCHAP will not involve itself in any form of collusion regarding rate setting with other governmental contractors and will follow the procurement process to the letter of the law as established by the government agency.

UTILIZATION OF SUPPLIERS AND SUBCONTRACTORS

CPCHAP will utilize suppliers of goods and services strictly based on price, quality of service rendered and how each vendor is able to meet the Company needs. All relationships with vendors and subcontractors will be professional and best serve the needs of CPCHAP and not the needs of the vendor or any internal/external individuals. When procuring office equipment or supplies exceeding \$5,000.00 the Company will secure multiple bids to determine fair and competitive prices and will choose the vendor or supplier based on price and the ability of the vendor to meet CPCHAP's needs. Any vendor or supplier found to be creating undue pressure on an employee to secure the sale should be reported to the Corporate Compliance Officer. CPCHAP will not tolerate excessive pressure from any vendor or supplier hoping to gain the approval for the sale of the goods or service.

CONFLICT OF INTEREST

A conflict of interest is any business, financial, or personal activity that may negatively affect an employee's job performance and carrying out their job responsibilities. A conflict of interest can occur when a person or organization is involved in multiple interests, financial interest, or one that could possibly lessen the motivation of the individual in performing their job responsibilities for CPCHAP. A conflict of interest could present an opportunity for an employee's personal gain over and above the normal benefits associated with the individual's employment with CPCHAP. Conflicts of interest will also include any member of the employee's family who may have a financial or personal interest in any company that CPCHAP does business with. While family members can be employed by CPCHAP simultaneously, one family member cannot supervise another family member.

When a conflict of interest or the perception of a conflict exists, the employee must report this conflict or perceived conflict to the Corporate Compliance Officer who will discuss the conflict issue with the Corporate Compliance Committee for a final determination on the action to be taken.

BRIBES AND KICKBACKS

A bribe or kickback is when payment is made with the intent of influencing or gaining something from a company or a person. Bribes and kickbacks also involve the intentional acceptance of payments, products or services for the purpose of soliciting additional business that would otherwise not be realized. Bribes and kickbacks are illegal and considered to be fraud. CPCHAP is committed to complying with all laws and regulations governing bribes and kickbacks. Examples of a bribe in the home health care industry may be:

- Paying money or giving a gift of more than a nominal amount to an employee of another company with the intent of receiving a benefit (such as new referrals of patients) that would not necessarily have been received without the giving of the money or gift.
- The giving of a gift to a vendor or supplier so as to receive discounted goods or other benefits not associated with the business transaction such as tickets to local events or other entertainment.

CPCHAP trains its employees to understand these actions and to report what may seem to be any form of a bribe or kickback to the Corporate Compliance Officer or member of the Corporate Compliance Committee.

FALSE CLAIMS

When a person knowingly presents or causes a claim to be presented for approval and payment that contains inaccurate or wrong information. Knowingly is a key factor in determining a false claim, which is considered fraudulent. Examples of a false claim may be:

- Submitting a claim for services which, knowingly contains false information contained in the claim
- Submitting a claim for services provided by an employee who does not have proper credentials for the service provided.
- Submitting a claim for services that were not requested through a Doctor's order or request.
- Submitting a claim for service hours that were in excess of the actual hours provided.
- Submitting a claim for services that were never provided

Submitting false claims has severe penalties and is considered fraud, which is the intentional deception or misrepresentation of fact that can result in gaining resources that would not be gained if the information on the claim was accurate. Therefore, all employees who submit claims and billings must be very careful and accurate in all filings to avoid any violation of the False Claims Act. If any employee has any question regarding the filing of a claim, they should not file the claim and contact the Corporate Compliance Officer or a member of the Corporate Compliance Committee to receive further direction regarding the submission of the claim.

Any employee who is aware of a violation of the Corporate Compliance Program including bribes, kickbacks or false claims must, under the requirements of the CCP, report that which is known to them. Any person reporting a violation will not receive any disciplinary action or retaliation from CPCHAP because reporting illegal actions or unethical behavior is the foundation on which this Corporate Compliance Program is built. In addition, CPCHAP will not violate any regulations of the Whistle Blowers Protection Act, which forbids any type of retaliation or reprisal against employees for reporting fraud, waste and abuse.

MAINTENANCE OF FUNDS

No monies received will go unrecorded and will be maintained in appropriate bank accounts maintained by CPCHAP. All monies received are subject to being audited by Certified Public Accountants as well as governmental agencies. No payment is to be made to any officer, or employee of the Company other than their regular reimbursement for their position including benefits and bonuses if applicable. Improper payments may include, but is not limited to, political contributions to government officials, political or commercial bribery. Illegal or improper payments does not include political contributions as provided by law.

GENERALLY ACCEPTED ACCOUNTING PRINCIPLES (GAAP)

CPCHAP complies with all generally accepted accounting principles by ensuring no false or misleading entries are made in its books and records. No Company funds will be established or deposited into any personal or non-corporate account since all funds received by CPCHAP must be available to be accounted for throughout any audit process conducted by a Certified Public Accountant or governmental agency.

GIFTS

Employees of CPCHAP will not give/accept any gifts to/from employees of any governmental agency. Federal, State and City agencies have regulations relating to the acceptance of gifts by their employees from entities that they do business with. In order to ensure adherence to these regulations, no gifts are to be given or accepted by governmental agency employees.

In addition, no gifts are to be given or accepted by suppliers or vendors the Company does business with except for items of a token value such as promotional products produced by the supplier such as, but not limited to, pens calendars, calculators etc. The acceptance of gifts carrying a larger value can be misinterpreted as a means by which the vendor is looking for special treatment from the person who received the gift. This gift giving is especially prevalent during the holidays. We should discourage all vendors from sending gifts to any employee, but if it does happen, rather than insult the vendor, who is giving the gift in the spirit of the season, needs to be informed that you did not keep the gift but shared it with all staff. Finally, gift giving by a subordinate to a supervisor within the Company is not allowed. Although the intention of the gift may be without any ulterior motive, it can, correctly or incorrectly, be perceived as a means of favorable treatment. Any gift presented to any employee by a paraprofessional field staff person is to be immediately reported to the Corporate Compliance Officer by the employee who received the gift.

Gift giving among staff does have some exceptions, which are if the gift giving is a clear expression of a family relationship or personal friendship rather than the position of the employee within the Company. Celebrations of a birthday, leaving employment of CPCHAP or showers are some examples of when gift giving is acceptable under this Compliance Program. Any gifts received by staff that are above a token value (\$15.00) must be immediately reported to the Corporate Compliance Officer who will investigate the reason for the gift giving and determine an appropriate resolution.

PERSONAL ACTIVITIES OFF THE JOB

When employees are not functioning within their job responsibilities, their conduct needs to be one that does not discredit CPCHAP or negatively reflect on CPCHAP. In order to ensure the integrity of the Company, disciplinary or other corrective action will be taken if an employee's conduct or comments outside of job activities discredits the Company or reflects a poor image of the Company or any of its employees. Comments made by the employee that creates general negativity by the general public or when outside activities adversely affect job performance, the employee will be disciplined up to and including termination, depending on the individual circumstances.

One outside activity that may adversely affect job performance is taking on the responsibilities of a second job. Being employed in a second job can lessen the efficiency, alertness or productivity normally provided to one employer. Employees who take on a second job may be placed in a position of conflict if the second employment is with a company that performs substantially similar services and the employee begins conducting job responsibilities in accordance with policies of the other employer. Second employment jobs for full time employees should be disclosed to the Corporate Compliance Officer who will inform the Corporate Compliance Committee for a final determination.

CPCHAP prefers employees of the Company not to hold positions outside of CPCHAP, but understands there may be exceptions that are necessary for part-time nurses, HHA and PCA staff. These part-time employees may work for second companies as long as their work schedule does not interfere with the schedule established at CPCHAP.

In no event should work schedules overlap whereby the employee is submitting time records that indicate he or she worked at both jobs simultaneously. Full-time employees may not take on outside employment with any competitor of the Company or a company that seeks a business relationship with CPCHAP as this can create a conflict of interest or a perceived conflict of interest.

CPCHAP supports employees' involvement in community activities and professional organizations. When these interests are pursued in a responsible manner it reflects favorably upon the employee and CPCHAP. If it could be construed that the employee's affiliation with the Company might be used to confer an unfair advantage on the other organization or the employee would personally profit from his or her affiliation with the Company, a conflict is presumed and the employee should consult with, and obtain advance approval from the Corporate Compliance Officer who will discuss with the Corporate Compliance Committee.

CPCHAP should not contribute to political candidates or political parties. This is especially sensitive based on the significant business that is conducted with New York City governmental contracting agencies. Individuals may participate in political activities individually and should not leave any impression that their support is from the Company's standpoint. Any involvement that CPCHAP may have in political activities must be approved by the CEO and a Board Member. Employees of CPCHAP should not use Company funds or facilities, including office equipment and supplies, to support any political activities of a candidate or party.

TRAINING AND EDUCATION

The Corporate Compliance Officer is charged with the responsibility to ensure that all new hires including executives and Board members receive training in CPCHAP's Corporate Compliance Program during orientation or within 30 days of their employment/appointment date. It is the policy of the organization to have each new hire sign an acknowledgement form attesting to the fact that they received a copy of CPCHAP's Corporate Compliance Program and initial training in the Program. In addition, the Corporate Compliance Officer will ensure that Corporate Compliance training is provided to all employees including executives and Board members on an annual basis. Each employee, executive and Board member attesting to the fact that they received annual training in CPCHAP's Corporate Compliance Program.

Initial Corporate Compliance Program Training Acknowledgement

I hereby acknowledge that I have received and reviewed Chinese-American Planning Council Home Attendant Program's Corporate Compliance Program. Upon my review, I was given an opportunity to ask questions and understand that I can ask any additional questions I may have in the future by contacting the Corporate Compliance Officer through the means outlined in the Program.

I agree to comply with all regulation, policies and principles contained in the Program and further understand that disciplinary actions will be initiated against me if I violate any policy, requirement or principle contained in this Program.

Name (Please Print)

Signature

Date

Last 4 digits of SS#