



Code of Conduct

Preface

“Do the right thing.” Those affiliated with St. Lawrence NYSARC are expected to apply those words to how we serve the individuals in our programs. Yes, it’s about dedicating us to full inclusion and integration of people with intellectual and developmental disabilities. But it’s also about doing the right thing more generally-following the law, acting honorably, and treating each other with respect.

The St. Lawrence NYSARC’s Code of Conduct is one of the ways we put “doing the right thing” into practice. It’s built around the recognition that everything we do in connection with our work at St. Lawrence NYSARC will be, and should be measured against the highest possible standards of ethical business conduct. Trust and mutual respect among employees and individuals who receive our services are the foundation of our success and they are something we need to earn every day.

So, read this Code. It is meant to be followed both in its spirit and letter, always bearing in mind that all of us affiliated with St. Lawrence NYSARC have a personal responsibility to incorporate and encourage others to incorporate the principles of the Code in our work. This is not a detailed or all inclusive list of what to do in every aspect of your work, but rather a roadmap to help people with special needs live self-directed, meaningful lives in their communities. If you ever have a question or think that another individual or our Agency as a whole may be falling short of our commitment, don’t be silent. It is your responsibility to report your concerns.

Who must follow our Code?

We expect our employees and Board members to know and follow the Code. Failure to do so can result in disciplinary action, including termination of employment. While the Code is written specifically for employees and Board members, we expect St. Lawrence NYSARC contractors, consultants, vendors and individuals who receive our services to follow the Code in connection with their work for us. Failure to do so could result in termination of their relationship with St. Lawrence NYSARC.

What if I have a Code-Related Question or Concern?

If you have a question or concern, don’t just keep it to yourself. You can contact your Supervisor, Manager, Director, Administrator or Corporate Compliance Officer. If you want to remain anonymous, you can report a suspected violation or concern through the Compliance Helpline.

No Retaliation

St. Lawrence NYSARC prohibits retaliation against any employee who reports or participates in an investigation of a possible violation of the Code. If you believe you have been retaliated against, please contact the Corporate Compliance Officer.

I. The Individuals we serve

Regarding services provided to the individuals in our programs, our Code of Conduct includes provisions not just from the St. Lawrence NYSARC Code of Conduct, but also from the following:

- **Code of Conduct for Custodians of People with Special Needs** developed by the New York State Justice Center which requires that their Code be read and signed by anyone who will have regular and substantial contact with any person receiving services or supports from facilities or providers covered under the Protection of People with Special Needs Act.
- **Code of Ethics for Direct Support Professionals (DSP)** developed by the National Alliance for Direct Support Professionals (NADSP) which guides DSPs through the ethical dilemmas they face daily and encourages the highest professional ideals.
- You must abide by the following provisions:

Justice Center	Direct Support Professional	St. Lawrence NYSARC
<p>Person Centered Approach My primary duty is to the people who receive supports and services from this organization. I acknowledge that each person of suitable age must have the opportunity to direct his or her own life, honoring, where consistent with agency policy, their right to assume risk in a safe manner, and recognizing each person's potential for lifelong learning and growth. I understand that my job will require flexibility, creativity and commitment. Whenever consistent with agency policy, I will work to support the individual's preferences and interests.</p>	<p>Person Centered Supports As a DSP, my first allegiance is to the person I support; all other activities and functions I perform will follow this allegiance. <i>Furthermore, as a DSP, I will:</i></p> <ul style="list-style-type: none"> • Commit to person-centered supports as best practice. • Focus first on the person and understand that my role in direct supports will require flexibility, creativity and commitment. • Recognize that each person is capable of directing their own life. • Honor those who cannot speak by seeking other ways of understanding them. • Recognize that the unique culture, social network, circumstances, personality, preferences, needs and gifts of each person I support must be the primary guides for the selection, structure, and use of supports for that person. • Advocate with the person I support and others when the demands of the system override the needs of those I support, or when individual preferences, needs or gifts are neglected for any reason. 	<p>As an employee of St. Lawrence NYSARC, I will treat all individuals respectfully and appropriately. I will recognize that individuals over the age of 18 are adults and interact with them on that level.</p>
<p>Physical, Emotional and Personal Well-Being I will promote the physical, emotional and personal well-being of any person who receives services and supports from this organization, including their protection from abuse and neglect and reducing their risk of harm to others and themselves.</p>	<p>Promoting Physical and Emotional Well-Being As a DSP, I am responsible for supporting the emotional, physical and personal well-being of the individuals receiving support. I will encourage growth and recognize the autonomy of the individuals receiving support while being attentive and energetic in reducing their risk of harm.</p>	<p>As an employee of St. Lawrence NYSARC, I will not engage in any action constituting abuse, mistreatment or neglect as defined in Part 624 of the Commissioner's Regulations. I understand that St. Lawrence NYSARC does not tolerate abuse in any form. I will respect safety rules and make a timely and accurate report of an</p>

	<p><i>Furthermore, as a DSP, I will:</i></p> <ul style="list-style-type: none"> • Develop a respectful relationship with the people I support that is based on mutual trust and maintains professional boundaries. • Understand and respect the values of the people I support and facilitate their expression of choices related to those values. • Assist the people I support to prevent illness, avoid unnecessary risk, and understand their options and possible consequences that relate to their physical health, safety, and emotional well-being. • Partner with each person and their support network to identify areas of risk and create safeguards specific to these concerns. • Challenge other support team members, such as doctors, nurses, therapists, coworkers, and family members, to recognize and support the rights of people to make informed decisions even when these decisions involve personal risk. • Be vigilant in identifying and reporting any situation in which the people I support are at risk of abuse, neglect, exploitation or harm. • Address challenging behaviors proactively and respectfully. If aversive or deprivation intervention techniques are included in an approved support plan, I will work diligently to find alternatives and pursue the elimination of these techniques from the person's plan. 	<p>accident or injury. I will follow plans in place for protection of health and safety and follow recommendations of clinical service providers including behavior support staff.</p>
<p><i>Integrity, Responsibility and Professional Competency</i> I will reinforce the values of this organization when it does not compromise the well-being of any person who receives services and supports. I will maintain my skills and competency through continued learning, including all training provided by this organization. I will actively seek advice and guidance of others whenever I am uncertain about an appropriate course of action. I will not misrepresent my professional qualifications or affiliations. I will demonstrate</p>	<p><i>Integrity and Responsibility</i> As a DSP, I will support the mission of vitality of my profession to assist people in leading self-directed lives to foster a spirit of partnership with the people I support, other professionals, and the community.</p> <p><i>Furthermore, as a DSP, I will:</i></p> <ul style="list-style-type: none"> • Be aware of my own values and how they influence my professional decisions. • Maintain competency in my profession through learning and ongoing collaboration with others. • Assume responsibility and accountability for my decisions and actions. • Advance my knowledge and skills 	<p>As an employee of St. Lawrence NYSARC, I will not engage in any act contrary to the St. Lawrence NYSARC Code of Conduct including acts of omissions involving staff or individuals. I will follow Agency policies and procedures regarding provision of supports and services. I agree to communicate professionally with other service providers, the individual's support network and the general public.</p>

<p>model behavior to all, including persons receiving services and supports.</p>	<p>through ongoing professional development and lifelong learning.</p> <ul style="list-style-type: none"> • Seek advice and guidance on ethical issues from others as needed to inform decision-making. • Recognize the importance of modeling valued behaviors to co-workers, people I support, and the community at-large. • Practice responsible work habits. 	
<p>Personal Health Information and Confidentiality I understand that persons served by my organization have the right to privacy and confidentiality with respect to their personal health information and I will protect this information from unauthorized use or disclosure, except as required or permitted by law, rule, or regulation.</p>	<p>Confidentiality As a DSP, I will safeguard and respect the confidentiality and privacy of the people I support. <i>Furthermore, as a DSP, I will:</i></p> <ul style="list-style-type: none"> • Seek information directly from those I support regarding their wishes in how, when and with whom privileged information should be shared. • Recognize that confidentiality agreements are subject to federal and state laws and regulations, as well as agency policies. • Recognize that it may be necessary to disclose confidential information in order to prevent serious or imminent harm to the person I support or others. • Seek out qualified guidance to help clarify situations where the correct course of action is unclear to me. 	<p>As an employee of St. Lawrence NYSARC, I will comply with all applicable laws and regulations regarding personal privacy and confidentiality of personal information. I will make and maintain any records required by my job promptly, truthfully, completely and accurately.</p>
<p>Non-Discrimination I will not discriminate against people receiving services and supports or colleagues based on race, religion, national origin, sex, age, sexual orientation, economic condition or disability.</p>	<p>Justice, Fairness and Equity As a DSP, I will promote and practice justice, fairness, and equity for the people I support and the community as a whole. I will affirm the human rights, civil rights and responsibilities of the people I support. <i>Furthermore, as a DSP, I will:</i></p> <ul style="list-style-type: none"> • Assist the people I support to access opportunities and resources in the community that are available to everyone. • Facilitate the expression and understanding of rights and responsibilities with the people I support. • Understand the guardianship or other legal representation of the people I support, and work in partnership with legal representatives to assure that the person's preferences and interests are honored. 	<p>As an employee of St. Lawrence NYSARC, I will recognize and actively implement protections for each individual's civil, legal and human rights</p>
<p>Respect, Dignity and Choice I will respect the dignity and individuality of any person who</p>	<p>Respect As a DSP, I will respect the human dignity and uniqueness of the people I</p>	<p>As an employee of St. Lawrence NYSARC, I will recognize the dignity of the individuals I serve and treat</p>

<p>receives services and supports from this organization and honor their choices and preferences whenever possible and consistent with agency policy. I will help people receiving supports and services use the opportunities and resources available to all in the community, whenever possible and consistent with agency policy.</p>	<p>support. I will recognize each person I support as valuable and promote their value within communities. <i>Furthermore, as a DSP, I will:</i></p> <ul style="list-style-type: none"> • Seek to understand the people I support today in the context of their personal history, their social and family networks, and their hopes and dreams for the future. • Recognize and respect the cultural context (such as gender, disability, religion, sexual orientation, ethnicity, socio-economic class) of the person supported and his/her social network. • Honor the choices, preferences, abilities and opinions of the people I support. • Protect the privacy of the people I support. • Interact with the people I support in a manner that is respectful to them. • Provide opportunities for the people I support to be viewed and treated with respect and embraced as integral, contributing members of their communities. • Promote the use of language that is respectful, sensitive and contemporary. • Practice positive intention and transparency in my interactions. 	<p>them with courtesy. I will respect the personal privacy and private property rights of the individuals I serve</p>
<p>Relationships I will help people who receive services and supports from this organization maintain or develop healthy relationships with family and friends. I will support them in making informed choices about safely expressing their sexuality and other preferences, whenever possible and consistent with agency policy.</p>	<p>Relationships As a DSP, I will assist the people I support to develop and maintain relationships. <i>Furthermore, as a DSP, I will:</i></p> <ul style="list-style-type: none"> • Advocate with the people I support when they do not have opportunities to build and maintain relationships. • Recognize the importance of maintaining reciprocal relationships and proactively facilitate relationships between the people I support, their family and friends. • Assure that people have the opportunity to make informed choices in safely expressing their sexuality. • Separate my personal beliefs and expectations regarding relationships (including sexual relationships) from those of the people I support. If I am unable to separate my own beliefs and preferences in a given situation, I will remove myself from the situation and seek the assistance of a qualified coworker. 	<p>As an employee of St. Lawrence NYSARC, I will not allow any unauthorized visitors to have access to any of the premises of St. Lawrence NYSARC.</p>

	<ul style="list-style-type: none"> Refrain from expressing negative views, harsh judgments, and stereotyping of people. 	
<p>Self- Determination I will help people receiving supports and services realize their rights and responsibilities, and, as consistent with agency policy, make informed decisions and understand their options related to their physical health and emotional well-being.</p>	<p>Self- Determination As a DSP, I will assist the people I support to direct the course of their own lives. <i>Furthermore, as a DSP, I will:</i></p> <ul style="list-style-type: none"> Support the rights of individuals to lead self-directed lives, working in partnership with other members of the person’s support network. Promote self-determination in physical, intellectual, emotional, social and spiritual pursuits. Honor a person’s right to assume risk in an informed manner. Recognize that each individual has potential for lifelong learning and growth. Celebrate, accept and learn from life’s rich experiences with people through triumphs and failures. 	<p>As an employee of St. Lawrence NYSARC I will recognize the opportunity for lifelong learning and development at home, at work and in the community</p>
<p>Advocacy I will advocate for justice, inclusion and community participation with, or on behalf of, any person who receives services and supports from this organization, as consistent with agency policy. I will promote justice, fairness and equality, and respect their human, civil and legal rights.</p>	<p>Advocacy As a DSP, I will advocate with the people I support for justice, inclusion and full community participation. <i>Furthermore, as a DSP, I will:</i></p> <ul style="list-style-type: none"> Support people to speak for themselves in all matters, and offer my assistance when needed. Represent the best interests of people who cannot speak for themselves by partnering with the individual and their support team to gather information and find alternative means of expression. Advocate for laws, regulations, policies, and procedures that promote justice and inclusion for all people with disabilities. Promote human, legal, and civil rights for all people and help those I encounter to understand these rights. Seek additional advocacy services when those that I provide are not sufficient. Seek out qualified guidance when I am unsure of the appropriate course of action in my advocacy efforts. Recognize that those who victimize people with disabilities must be held accountable. 	<p>As an employee of St. Lawrence NYSARC, I will understand that individuals who use programs and services of St. Lawrence NYSARC will have equal access to all aspects of the programs and services recommended in their Individualized Service Plan.</p>
<p>Reporting Requirement As a mandated reporter, I acknowledge my legal obligation</p>		

<p>to report all allegations of reportable incidents immediately upon discovery to the Justice Center’s Vulnerable Persons’ Central Register by calling 1-855-373-2122</p>		
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II. Respect Each Other

St. Lawrence NYARC is committed to a work environment where employees have the opportunity to reach their fullest potential. Each employee is expected to do his or her utmost to create a respectful workplace culture that is free of harassment, intimidation, bias and unlawful discrimination of any kind.

1. Equal Opportunity Employment *[Refer to Agency Manual Section 4.1.1]*

Employment is based on individual merit and qualifications directly related to professional competence. St. Lawrence NYSARC prohibits unlawful discrimination or harassment of any kind, including discrimination or harassment on the basis of race, color, religion, veteran status, national origin, ancestry, pregnancy status, sex, gender identity or expression, age, marital status, mental or physical disability, medical condition, sexual orientation or any other characteristics protected by law. We also make all reasonable accommodations to meet our obligations under laws protecting the rights of the disabled.

2. Positive Environment *[Refer to Agency Manual Section 7.1.1]*

If you feel you have been verbally, physically or visually harassed by anyone at St. Lawrence NYSARC, you should immediately report the incident to your supervisor, Human Resources or both. Any complaints will be investigated with appropriate action taken

3. Drugs and Alcohol *[Refer to Agency Manual Section 7.2.14]*

Our position on substance abuse is simple: It is incompatible with the health and safety of our employees and we don’t permit it. Employees may not use, possess, distribute, sell or consume alcohol, illegal drugs or other illegal substances while at the premises of St. Lawrence NYSARC or anywhere else while at work for the agency. No one is to report to work while under the influence of alcohol, illegal drugs or substances or any prescribed medication that impairs ability to perform scheduled work. If a manager has reasonable suspicion to believe that an employee’s use of drugs and/or alcohol may adversely affect the employee’s job performance or the safety of the employee or others in the workplace, the manager may request an alcohol and/or drug screening. A reasonable suspicion may be based on objective symptoms such as the employee’s appearance, behavior or speech.

4. Smoking *[Refer to Agency Manual Section 7.1.2]*

Smoking is prohibited inside any buildings or vehicles owned or used by St. Lawrence NYSARC. There are specified outdoor areas where smoking and use of substances that contain tobacco products are permitted.

5. **Safe Workplace** *[Refer to Agency Manual Section 7.2.13]*

We are committed to a violence-free work environment and we will not tolerate any level of violence or the threat of violence in the workplace. Under no circumstances should anyone bring a weapon to work.

III. Avoid Conflicts of Interest

In working at St. Lawrence NYSARC, we have an obligation to always do what's best for the Agency and the individuals we serve. If you are ever in a situation in which competing loyalties could cause you to pursue a personal benefit for you, your friends or your family at the expense of St. Lawrence NYSARC, you may be faced with a conflict of interest. All of us should avoid conflicts of interest and circumstances that reasonably present the appearance of a conflict.

When faced with a potential conflict of interest, ask yourself:

- Would this activity create an incentive for me, or be perceived by others to create an incentive for me to benefit myself, my friends or my family or an associated business at the expense of St. Lawrence NYSARC?
- Would this activity harm my reputation, negatively impact my ability to do my job at St. Lawrence NYSARC or potentially harm St. Lawrence NYSARC?
- Would this activity embarrass St. Lawrence NYSARC or me if it showed up on the front page of a newspaper?

If the answer to any of these is yes, the relationship or situation is likely to create a conflict of interest and you should avoid it.

Below are some areas where conflicts of interest often arise:

- Outside employment, advisory roles, or starting your own business
- Business opportunities found through work
- Friends and relatives; co-worker relationships
- Accepting gifts, entertainment and other business courtesies

In any of these situations, the rule is the same-if you are entering into a situation that creates a conflict of interest, don't! If you are in a situation that may create a conflict of interest or the appearance of a conflict of interest, review the situation with your manager and the Corporate Compliance Officer.

IV. Preserve Confidentiality *[Refer to Agency Manual Section 7.1.3 & 7.2.10]*

St. Lawrence NYSARC's "confidential information" includes protected health information as well as information that is privy to those who are affiliated with the agency. It is important to check with your supervisor before releasing or making copies of any information which might be protected health information which is HIPAA protected.

Confidential information also includes any photos or digital images of any of our individuals who receive services. Photo images must be taken with Agency cameras, never with personal cameras or cell phones. Release of these images requires written consent by the individual or responsible person.

Remember that confidential information can be verbal so be mindful of who is within hearing distance when speaking to co-workers or on phone conversations when out in public. Personal cell phones are not to be used when you are providing services to individuals. Additionally posting anything work related on a social networking site is prohibited. [\[Refer to Agency Manual Section 7.2.1\]](#)

V. Protect SLNYSARC's Assets

St. Lawrence NYSARC has a well-earned reputation for generosity with our employee benefits and transparency within the Agency. Our ability to continue these practices depends on how well we conserve Agency resources and protect Agency assets and information.

St. Lawrence NYSARC provides the tools and equipment needed to do your jobs effectively, but counts on you to be responsible and not wasteful with the supplies and tools provided for you. St. Lawrence NYSARC's communication system (which includes both our network and the hardware that uses it like computers and mobile devices) is a critical aspect of the Agency's property. Be sure to follow all security policies. If you have any reason to believe that our network security has been violated, for example, you lose your laptop or cell phone or think that your network password may have been compromised-please report promptly to the IT Security Officer.

Any and all property of St. Lawrence NYSARC should be respected and cared for as if it were your own.

VI. Ensure Financial Integrity and Responsibility

Financial integrity and fiscal responsibility are core aspects of professionalism. This is more than accurate reporting of our financials, though that is certainly important. Any money we spend on behalf of St. Lawrence NYSARC is not ours; it belongs to the Agency. Each person at St. Lawrence NYSARC has a role in making sure that money is appropriately spent, our financial records are complete and accurate and internal controls are honored.

No one may use a St. Lawrence NYSARC credit card to make a purchase in the Agency's name without being duly authorized.

If you're unsure about whether you should spend money or submit an expense for reimbursement, check with your manager. Managers are responsible for money spent and expenses incurred and should carefully review any purchases before approving.

If your job requires financial recording of transactions for program petty cash or consumer funds, make sure that you're fully familiar with all of the St. Lawrence NYSARC policies that apply. Immediately report to your manager or supervisor any transactions that you think are not being recorded correctly.

VII. Obey the Law

St. Lawrence NYSARC takes its responsibilities to comply with laws and regulations very seriously and each of us is expected to comply with applicable legal requirements and prohibitions. While it's impossible for anyone to know all aspects of every applicable law, you should understand the major laws and regulations that apply to your work. Take advantage of Corporate Compliance and Human Resources to assist you here.

VIII. Specific Rules Regarding Behavior and Conduct

1. No one shall engage in any action constituting abuse as defined in Part 624 of the Commissioner's Regulations. Abuse is a broad term under these regulations and may include features of physical, sexual, psychological, verbal or neglect components. St. Lawrence NYSARC does not tolerate abuse in any form.
2. All staff must obey and follow any specific orders or directions from an immediate supervisor and act in accordance not only with all applicable laws and regulations but also in the best interests of St. Lawrence NYSARC.
3. All staff of St. Lawrence NYSARC, unless granted leave according to policy, must strictly abide by their scheduled work and break times as well as any standards set for production or quality of work.
4. Unless given specific permission by an Individual Service Plan, no person shall use, possess, distribute, sell, or consume alcohol, illegal drugs or other illegal substances while on the premises of St. Lawrence NYSARC or anywhere else while at work for the Agency.
5. No person shall report to work at any of the premises of St. Lawrence NYSARC while under the influence of alcohol, illegal drugs or substances, or any prescribed medication that impairs that person's ability to perform any of the scheduled work.
6. No person shall possess or keep any legal or illegal weapons including firearms, knives, batons, brass knuckles at or on any of the premises of St. Lawrence NYSARC.
7. No person shall steal, intentionally misuse, or damage any of the property of St. Lawrence NYSARC or of any other person.
8. All persons who keep records for any reason for St. Lawrence NYSARC shall make and maintain all of those records promptly, truthfully, completely, and accurately. No records should ever intentionally convey false information or misrepresent or omit any facts required for a completely accurate recording of an event.
9. No person, contractor, or director of the Agency shall engage in any financial transaction that may be interpreted as a benefit to the staff person or volunteer to the detriment of an Agency consumer.

10. Each person affiliated with St. Lawrence NYSARC shall comply with all applicable laws and regulations regarding personal privacy and confidentiality of personal information. No one shall reveal or discuss any confidential information including protected health information regarding another person who is entitled to expect confidentiality or privacy concerning that information.
11. No person shall smoke or otherwise use a substance that contains tobacco products inside any buildings or vehicles owned or used by St. Lawrence NYSARC. There are specified outdoor areas where smoking and use of substances that contain tobacco products are permitted. Smoking and any other use of substances that contain tobacco products are prohibited elsewhere.
12. No person shall operate any vehicles, machinery, tools or equipment without appropriate training, a valid license, if necessary and permission of a supervisor.
13. No person shall use the credit of the Agency or make any purchases in the Agency's name without being duly authorized.
14. No person shall gamble while on any of the premises of St. Lawrence NYSARC.
15. No person shall solicit contributions, post or remove notices on any bulletin board nor distribute any written or printed materials without prior approval of the Chief Executive Officer/Executive Director of St. Lawrence NYSARC.
16. Unless specified in a job description, no staff person may sleep while working for St. Lawrence NYSARC.
17. No person shall disregard any safety rules or fail to make a timely and accurate report of an accident or an injury.
18. No person shall eat in areas deemed unsanitary by OSHA or at work stations other than at authorized times.
19. No person shall violate applicable traffic laws or parking rules at any premises of St. Lawrence NYSARC or while operating any Agency vehicles on public thoroughfares.
20. No person shall violate applicable program dress rules.
21. No person shall permit any unauthorized visitors to have access to any of the premises of St. Lawrence NYSARC.
22. No person shall engage in any act considered contrary to the governing Ethical Principles of St. Lawrence NYSARC. Acting contrary to the governing Ethical Principles of St. Lawrence NYSARC could include acts or omissions involving staff or Agency consumers.
23. No person shall intentionally misuse leave provisions as provided by Family Medical Leave Act, New York Disability, or Worker's Compensation Law.
24. Unauthorized use of personal electronic devices on Agency property is prohibited. This includes lap top computers, I-pods, tablets and other devices currently available and will include electronic devices not yet in circulation. Considered are those devices capable of photography, voice recordings, internet capability, texting and email.

Note that any violation of these Ethical Principles or rules by a staff person, contractor or other person affiliated with St. Lawrence NYSARC will result in disciplinary action. St. Lawrence NYSARC will treat each violation on an individual basis with the preferred procedure being the progressive discipline system outlined in Section 4.5 of this Manual. Some violations of St. Lawrence NYSARC's Ethical Principles or these rules, however may be so serious in their adverse consequences to the

persons involved or to the Agency itself that immediate discharge from employment may be the only available and appropriate course of action. The progressive discipline mentioned for violations of these rules may range from counseling, oral warnings, written warning, recommended changes in position or privileges, termination of a contract, termination of employment or removal from a position or function with St. Lawrence NYSARC.

IX. Conclusion

It's impossible to spell out every possible ethical scenario we might face. Instead, we rely on one another's good judgment to uphold a high standard of integrity for ourselves and our Agency. We expect all affiliated with St. Lawrence NYSARC to be guided by both the letter and the spirit of this Code. Sometimes identifying the right thing to do isn't an easy call. If you aren't sure, don't be afraid to ask questions of your manager or Compliance Officer.

And remember...Do the right thing and if you see something that you think isn't right-speak up!

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