



CORPORATE COMPLIANCE SELF-STUDY GUIDE

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This self-study guide is parallel to PARC’s Corporate Compliance Policy & Procedure Manual you initially received when you were introduced to our Corporate Compliance Plan. The purpose of this self-study guide is to ensure that each PARC employee continues to remain well-informed and fully understands their role and responsibility in PARC’s Corporate Compliance Plan.

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These policies are not attached to this self-study guide due to the fact that you have already received and reviewed them in your initial training, however, should you wish to obtain an additional copy please contact the Chief Compliance Officer:



Dear Colleagues:

PARC has a long tradition of excellence in services for persons with developmental disabilities which is the foundation of the philosophy of our organization. We have always ensured an ethical, compassionate and enabling approach to participant services and to the professionals who deliver these services.

The PARC Corporate Compliance Plan, Code of Ethics and Standards of Conduct, adopted by our Board of Directors, provide clear guidance to ensure that our work is done in an ethical and legal manner. Although most of the Plan will seem like common sense and familiar practice, we wish to emphasize that the provisions and directions in this plan will govern the behavior of all employees, regardless of position, as well as those doing business with us, and protects against unlawful and unethical activity. We at PARC are deeply committed to the ideals reflected in our Vision and Mission Statement and our Guiding Principles and Expectations.

As a valuable member of the PARC team we ask that you support us by assisting our colleagues in understanding and promoting our principles and expectations, and in maintaining an ethical and lawful environment in which to support persons with developmental disabilities. Thank you.

Sincerely,

Susan Lucas
President, Board of Directors

Susan Limongello
Executive Director

I. PARC OVERVIEW AND MISSION STATEMENTS

PARC OVERVIEW

Our competent and dedicated board members and staff are committed to working in partnership with children and adults with developmental disabilities and their families in providing advocacy and comprehensive person centered services of the highest quality. We continually strive to promote and enhance opportunities for those individuals we support as valued members of our community.

PARC's MISSION STATEMENT

Empower individuals to achieve their highest quality of life.

PARC's CORPORATE COMPLIANCE COMMITTEE MISSION STATEMENT

PARC is committed to implementing consistent, ethical practices through the development of policies and procedures which enforce applicable laws and regulations to ensure the success of PARC's mission.

II. PROGRAM AUTHORITY AND OVERSIGHT

PURPOSE OF PARC'S CODE OF ETHICS AND STANDARDS OF CONDUCT

PARC has policies and procedures outlining its Code of Ethics and Standards of Conduct and this Corporate Compliance Plan. These promote the observance of the highest degree of moral and ethical conduct and establish standards of conduct to ensure that PARC and its board of directors, executive administration, directors, managerial staff, supervisory staff, employees, volunteers, interns, consultants, vendors and business associates (hereinafter referred to as "PARC and its Representatives" or "PARC's Representatives") conduct business in compliance with all federal, state and local laws, regulations and mandates, and Agency policy. This plan is provided to all PARC Representatives.

PARC and its Representatives shall never knowingly submit or provide false, fictitious or fraudulent information or claims to any government or private entity, program, person or department.

CORPORATE COMPLIANCE PROGRAM

PARC has adopted a Corporate Compliance Program, which establishes our commitment to adhere to all federal, state and local laws, regulations and mandates, and Agency policy.

PARC's Corporate Compliance Program is intended to define the standards of conduct expected of PARC's Representatives, and to provide guidance and a clear outline of expectations. These standards are designed to assist PARC's Representatives in making the right choices when confronted with difficult situations regarding compliance. Additionally, this program provides a process to address and resolve compliance issues. **The policies and procedures outlined in this Corporate Compliance Plan are mandatory and must be followed. Please contact the Chief Compliance Officer with further questions.** All PARC Representatives must abide by the letter and spirit of all applicable laws, regulations and mandates, and must act in accordance with the principle that full disclosure of all facts related to any activity is their responsibility. The obligations set forth in PARC's Corporate Compliance Plan apply to relationships with everyone with whom we do business or interact, including but not limited to, persons receiving services, their families, government authorities, vendors, consultants, third party payers, subcontractors, independent contractors, interns, volunteers, and one another.

PARC's Corporate Compliance Policies and Procedures are designed to complement, not replace, other PARC policies and procedures, federal/state/local laws, regulations and mandates. Revisions to the Corporate Compliance Plan will be made to address changes in these areas, or any other area.

For additional information or guidance about applicable laws and regulations, please call PARC's Chief Compliance Officer, John A. Meier at (845) 278-7272 extension 2286.

REGULATIONS

PARC provides a multitude of programs to the developmentally disabled adult and youth population including day habilitation services, residential services, clinical services, vocational services, early intervention and preschool services, service coordination, recreation services, TBI services, residential habilitation services, respite services, transitional services, educational advocacy services and

guardianship services. All programs and services are subject to and are licensed, certified and operated pursuant to all applicable federal, state and local laws, regulations and mandates.

PARC is also subject to federal and state laws and regulations including (but not limited to) those governing Medicaid and Medicare, labor and employee benefit practices, discrimination practices, participant protection and rights, tax laws and liability laws.

It is the expectation of PARC that its employees are familiar with the legal and regulatory requirements pertaining to their job responsibilities. While employees are not expected to be an expert in every legal and regulatory requirement, they are expected to seek guidance from their Supervisor, Department Director/Head, Chief Compliance Officer or Executive Administrator whenever any legal or regulatory question or concern is raised.

PROGRAM STRUCTURE AND OVERSIGHT AUTHORITY

PARC has a Chief Compliance Officer who is responsible for the development, implementation and general oversight of the Corporate Compliance Program. The Chief Compliance Officer reports directly to the Executive Director and is the Chairperson of the Corporate Compliance Committee.

The Corporate Compliance Committee, appointed by the Executive Director, is devoted to upholding the standards outlined in the Corporate Compliance Plan, and is committed to supporting PARC and its Representatives in meeting these standards. The Committee is comprised of members of PARC's Board of Directors, Executive Administrators and representatives of all major departments. Please contact the Chief Compliance Officer for current membership. Any concerns about the actions or members of the Corporate Compliance Committee may be brought to the Chief Compliance Officer, Executive Director, or to the Board Liaison to the Corporate Compliance Committee.

CHIEF COMPLIANCE OFFICER ROLE

The Chief Compliance Officer (CCO) oversees the Corporate Compliance Program and its day-to-day operations, assisting PARC and its Representatives to (a) remain in compliance with the rules and regulations of regulatory agencies, (b) follow Agency policies and procedures and (c) maintain compliance with PARC's Standards of Conduct and Code of Ethics. Additionally, the CCO assures decisive action on issues of potential non-compliance.

Duties include (but are not limited to):

- Acts as an independent review to ensure that compliance issues and concerns within the agency are being appropriately evaluated, investigated and resolved.
- Develops, initiates, maintains and revises policies and procedures for the general operation of the Compliance Program and its related activities to prevent illegal, unethical or improper conduct.
- Coordinates the corporate compliance training program, which includes independent contractors, employees and other representatives so they are aware of requirements of the compliance program.
- Coordinates personnel issues with appropriate agency departments to ensure that employees and independent contractors have not been excluded from federal or state programs.
- Identifies potential areas of compliance vulnerability and risk; develops and implements corrective action plans for resolution of problematic issues and provides general guidance on how to avoid or deal with similar situations in the future.

- Facilitate proper reporting of violations or potential violations to duly authorized enforcement agencies as appropriate and/or required.

CORPORATE COMPLIANCE COMMITTEE ROLE

See “Program Structure and Oversight Authority” for committee membership and formation.

Functions Include (but are not limited to):

- Meetings to review the status and progress of the Corporate Compliance Plan.
- Review corporate compliance concerns and ensure appropriate recommendations and corrective actions have been undertaken.
- Analyze risk areas and related policies and procedures for possible inclusion into the compliance program.
- Develop policies and procedures to promote compliance with legal and ethical requirements.
- Develop internal controls and systems to carry out the Agency’s standards, policies and procedures.
- Develop system for reporting, evaluating and responding to complaints and problems; Reviews internal/external audits and investigations to identify potential non-compliant issues and ensure implementation of corrective actions.
- Monitor progress of compliance efforts

LEGAL COUNSEL ROLE

When necessary, independent legal counsel shall assist Executive Administration, Chief Compliance Officer and General Counsel as requested to interpret laws and regulations pertaining to compliance, provide guidance on the maintenance of the compliance program and provide independent legal advice to PARC regarding compliance, audit or investigation issues.

When necessary, independent legal counsel may also be notified by General Counsel of circumstances which, when accompanied by a reasonable cause, may assert non-compliance. General Counsel may direct independent legal counsel to conduct an investigation into the facts surrounding such circumstances. The results of an investigation may be utilized by independent counsel to provide legal advice to PARC.

PARC’S BOARD OF DIRECTORS’ ROLE

PARC’s Board of Directors is the governing body and will approve the Corporate Compliance Plan. At least one board member will also serve as a member of the Corporate Compliance Committee. The Board of Directors will receive regular updates on the efforts and activities of the Corporate Compliance Program.

III. CORPORATE COMPLIANCE OPERATIONS

GUIDANCE ON REPORTING OF VIOLATIONS OR COMPLIANCE ISSUES

For any guidance on or reporting of compliance issues, including those outlined in the Corporate Compliance Plan, employees should contact their immediate supervisor and PARC's Chief Compliance Officer (contact information outlined in Section V of this Plan). If the employee believes that a report of concern should only be addressed to the Chief Compliance Officer, they may do so.

PERSONAL DUTY TO REPORT

In order to have an effective Corporate Compliance Program, we must all cooperate willingly, participate actively, and be free of retribution. All persons affiliated with PARC who bring forth a good-faith report of non-compliance with laws, agency policies or suspected fraud or illegal activity, can expect to be free of retaliation.

All employees or others affiliated with PARC are mandated to promptly report any issues of concern or suspected instances of fraud or non-compliance with laws and agency policies. This applies to any suspect activity by any employee, colleague, vendor, contractor, etc. Failure to report may lead to disciplinary action.

COMPLIANCE REPORTING SYSTEM

PARC has established a 24-hour Compliance Hotline (including a voice-mail system) available to all employees and other parties affiliated with PARC. This voice-mail system is manned by the Chief Compliance Officer or a designee which is to be used only to pose questions regarding any compliance issue, or to report a potential violation of PARC's Corporate Compliance Plan, federal, state or local law or regulation, or unethical behavior. The Chief Compliance Officer will respond to all calls within 10 business days or less. All calls and inquiries will be tracked for trends and appropriate response.

Compliance Hotline: (845) 278-7272 ext. 2411

Alternately, a written report or inquiry may be sent to the Chief Compliance Officer at the contact information located in Section II and V of this Plan.

Every effort will be made to ensure the confidentiality of any reporter who brings forth a complaint, report or issue. However, the identity of the reporter may become known during the investigation process. As noted earlier, PARC will not tolerate retaliation against good-faith reporters. Please refer to the Corporate Compliance Complaint Policy for the procedure PARC will follow in responding to any issues raised through the reporting system.

EXAMPLES OF A COMPLIANCE VIOLATION:

- Not documenting services provided at the time they were *actually* provided (meaning “contemporaneously”)
 - Using Agency vehicles for personal errands
 - Using Agency washers or dryers for someone who does not reside in a PARC residence
 - Documenting/billing for services not actually performed (falsely documenting or signing a daily checklist simply because you worked the shift not because you actually provided the service).
 - Backdating a document; not signing and dating in “real time”
 - Using a “Tax Exempt” form for personal use
 - Parking your vehicle in front of your workplace, getting out, swiping in, and then parking your vehicle.
 - Swiping in or out for another employee, or arranging for another employee to swipe you in or out.
 - Altering documentation during an audit or any time after it has been submitted for billing
 - Providing unnecessary services.
 - Documenting/billing for more expensive services.
 - Billing for services separately that should legitimately be one billing.
 - Billing more than once for the same service.
 - Falsifying documentation or cost reports.
- *Failure to report any of the above violations or any Corporate Compliance violation.*

AUDITS AND MONITORING

EXTERNAL AUDIT ACTIVITY

PARC is regularly audited by the NYS Office of People with Developmental Disabilities (OPWDD), which is the oversight body of many of our programs. If an auditor from OPWDD arrives in your department, immediately notify your Supervisor, Department Head/Director and the Director of Quality Assurance. OPWDD program certification audits and any resultant Statement of Deficiency(ies) [SODs] will be reviewed and responded to by appropriate program personnel, with the assistance of the Director of Quality Assurance, and/or the Chief Compliance Officer, as necessary. Copies of SODs and related responses will be internally distributed to the appropriate Program Director, Chief Compliance Officer, Director of Quality Assurance and Executive Administration.

In the event an auditor from any other external agency or government office (i.e. Medicaid Fraud Control Unit; NYS Attorney General’s Office; Department of Justice; OSHA; Department of Labor; Department of Health; Office of Child and Family Services; Office of the Inspector General, etc.) arrives in your department, immediately notify your Supervisor, Department Head/Director and the Chief Compliance Officer. For these audits, the Chief Compliance Officer and the Corporate Compliance Committee, together with department heads and executive administration, will review these audits to assist in establishing the appropriate response, and will elicit legal counsel advice when appropriate and necessary. Copies of responses will be distributed in the same manner as referenced above.

INTERNAL AUDITING AND MONITORING ACTIVITY

In order to monitor the Agency’s compliance with its policies and procedures, and federal, state and local laws and regulations, periodic internal audits will occur. The Chief Compliance Officer and Committee are responsible for ensuring these audits occur on a regular basis. PARC will also utilize results of external audits to assist in providing feedback on compliance matters, and to internally

monitor corrective action pursuant to any stated concern(s). PARC utilizes a number of internal self-auditing practices including: Quality Assurance reviews, Billing and Claims documentation, processing and reimbursement reviews, and audits of program and participant's funds/accounts conducted through finance. Self-audit reports and any resulting recommendations will be generated to program and executive administration, and the Corporate Compliance Committee, along with any required follow-up status.

To assist in ensuring adherence to state and federal regulations, the Chief Compliance Officer will also periodically monitor the Corporate Compliance Program through reviews of service delivery and clinical documentation, billing, claims processing and reimbursement procedures and practices. Reports related to such audits (and corresponding recommendations and corrective actions) will be provided to the Corporate Compliance Committee, and shall be maintained by the Chief Compliance Officer.

EMPLOYMENT/RETENTION OF EXCLUDED INDIVIDUALS

PARC will not employ, contract or be associated with individuals who are ineligible for participation in federally funded healthcare programs, or who have been convicted of criminal offenses related to the healthcare field. Additionally, current employees, contractors or personnel otherwise associated with PARC and who are charged on criminal offenses related to the healthcare field, or who become/may become excluded from federally funded healthcare programs, will be removed from responsibility of involvement in any such programs until such time as resolution of the charges is made. Should a conviction occur, then the relationship between such individual and PARC will be terminated.

EMPLOYEE OR CONTRACTOR LICENSURE/CERTIFICATION

All persons employed/contracted in positions which require a license to practice that discipline will maintain a current and valid license and/or certification, and be in good standing. Some examples (not all-inclusive) of such positions are Registered Nurse, Licensed Practical Nurse, Medical Doctor, Physical Therapist, Occupational Therapist, Clinician, Psychiatrist, Psychologist, Social Worker, and Special Education Teacher. All such persons will provide a copy of their current license and/or certification to PARC's Human Resources Department. The Human Resources department will periodically review licenses and/or certifications to verify non-exclusion status in any federal or state programs, and/or validity of license or certification.

DISCIPLINE

Discipline of PARC employees, consultants and representatives will be done in accordance with Agency policies and procedures.

Disciplinary actions, up to and/or including termination, may be taken for the following situations (this list is not all-inclusive):

- Failure to report or disclose the following by an employee, consultant or representative:
 - Conduct which violates law, regulation or guideline.
 - Violation of PARC's Corporate Compliance Plan.

- Retaliation against an individual for reporting a suspected or actual violation of the Corporate Compliance Plan, law, regulation or guideline.
- Willfully providing false information to PARC or any third party.
- Making a knowingly false report regarding a violation
- Knowingly presenting, or is otherwise involved in, false, fictitious or fraudulent claims for payment or approval.

In the event that a member of the Board of Directors is involved in one of the aforementioned situations they may be subject to removal from the Board.

Any entity under contract with PARC that is involved in one of the aforementioned situations shall be subject to contract termination.

TRAINING AND EDUCATION

PARC's orientation program for new employees includes an introduction and overview of the Corporate Compliance Plan, violation reporting and disciplinary actions for program violations. All new hires are mandated to take this segment of the orientation curriculum. The orientation program will be supplemented by an orientation conducted within the new employees program inclusive of program policies and procedures, and a review of regulations applicable to that program. These will be geared toward the employee's job responsibilities as outlined in their job description. All agency job descriptions will be revised to include corporate compliance requirements.

All incumbent employees will be mandated to attend an initial training, which include an introduction to Corporate Compliance, and overview of the Corporate Compliance Plan, violation reporting and disciplinary actions for program violations.

Ongoing education and training will be provided to affected employees at least annually. This on-going training will be provided either through the employee's program or via official training sessions, and will include 1 hour of regulatory compliance training appropriate to their job description and responsibilities, inclusive of compliance concepts and updates of regulatory information. This on-going training will ensure that staff are current in their regulatory knowledge and Agency policies and procedures.

The Human Resources/Training department tracks and monitors all trainings including, but not limited to, Corporate Compliance trainings and will provide status information relating to training expirations to departments both as needed and on at least a quarterly basis.

CONTRACTORS AND OTHER PARC REPRESENTATIVES

PARC mandates that all organizations or persons acting on PARC's behalf (i.e. consultants, independent contractors) comply with the Agency's Corporate Compliance Plan. Any such person or organization will be provided with PARC's Corporate Compliance Plan, Code of Ethics, Standards of Conduct, False Claims Policy and Compliance Complaint policy and are expected to adhere to the policies of PARC.

CODE OF ETHICS AND STANDARDS OF CONDUCT POLICIES AND PROCEDURES

PARC's Code of Ethics and Standards of Conduct Policies and Procedures sets forth PARC's standards for business practices. All PARC employees and representatives must adhere to these policies and procedures. A copy of these policies and procedures will be provided to each employee, and is attached and made part of this Corporate Compliance Plan.

RECORD KEEPING/DOCUMENTATION PRACTICES

All PARC records, reports and documentation will be accurately and honestly prepared and maintained. This includes payroll records, punch details, business expense reports and requests for reimbursement, personnel records, revenue and expenses and all other business and participant related records and documentation. All documentation and records will be kept in accordance with applicable federal and state laws and regulations, and document retention requirements. Each department will comply with the Agency's Document Retention Policy (which is attached).

All contracts entered into by PARC will accurately reflect the services to be received or provided. Only the Board of Directors (or Executive Director as designated by the Board of Directors) is authorized to enter into contracts on behalf of the Agency.

Records will not be falsified, backdated, destroyed or otherwise tampered with in any way. However, unnecessary or outdated records or documentation may be purged in accordance with PARC policies and procedures.

CONFIDENTIALITY

All employees and PARC representatives have a duty to uphold and protect confidential information. Confidential information includes, but is not limited to, information regarding participant's or families we support, employee data, participant lists, participant and employee financial data, payroll information, benefits, personnel files, disciplinary actions, research, legal and regulatory positions taken by PARC, strategic plans, etc. Except as were required by legal process, all such information must be held confidentially in accordance with all applicable laws and regulations (such as HIPAA), and PARC policies and procedures.

IV. BILLING, CODING, AND FISCAL COMPLIANCE

BILLING AND CODING COMPLIANCE

Billing activities shall be performed in a manner consistent with Medicaid, Medicare, NY State Education Department, County, Third Party Insurance, and any other federal and state laws, regulations and requirements. PARC will comply with all pertinent regulations in its billing and coding practices, including but not limited to, specific program requirements, procedure codes, bad debt reporting, medical necessity, credit balances and duplicate billing.

PARC prohibits practices related to claims such as false statements, mail fraud, wire fraud, or a conspiracy to commit fraud. It is the practice and continuing goal of all PARC employees and representatives related to billing to comply with all established federal, state and local laws and regulations. Billing and coding practices for participant services are based upon a complex set of laws and regulations, all PARC employees and representatives must abide by the following three principals:

- Prepare and maintain participant records and reports accurately and honestly.
- Ensure submitted claims to any federal and state health care program, individual, department or agency comply with all applicable laws and regulations.
- Ensure submitted claims accurately reflect that the: (a) services or products were actually rendered; (b) services or products were necessary and (c) claims are supported by the appropriate documentation.

Any PARC employee or other representative who presents, or is otherwise involved in, false, fictitious or fraudulent claims for payment or approval, **may be subject to immediate termination, as well as civil and criminal charges.**

PARC shall report to the appropriate authorities any claims which have been inaccurately submitted to any federal or state health care program, private entity, individual, department or agency and will reimburse any payments received on inaccurate claims. These situations will be documented by the Chief Compliance Officer and reported to the Executive Director.

FISCAL COMPLIANCE

PARC is committed to preparing and maintaining complete and accurate financial records in compliance with all tax and financial reporting requirements.

The Consolidated Fiscal Report (CFR) shall be prepared in compliance with all applicable regulations and accurately reflect the cost structure of PARC.

PARC's annual financial statements are prepared according to Generally Accepted Accounting Principles (GAAP) and are subject to external audit by independent Certified Public Accountants on an annual basis. The audit findings, including any management letters, are reviewed with the Executive Director and the Board of Directors. Annual, audited financial statements are submitted to any regulators or funding sources as required, and are available to other parties upon request.

V. Chief Compliance Officer

John A. Meier
PARC
31 International Boulevard
Brewster, New York 10509
Telephone: (845) 278-7272 Ext: 2286
Facsimile: (845) 278-5986

Compliance Hotline: (845) 278-72725 Ext: 2411

VI. Related Policies

These policies are not attached to this self-study guide due to the fact that you have already received and reviewed them in your initial training, however, should you wish to obtain an additional copy please contact the Chief Compliance Officer or visit our website at PutnamARC.Org

- Code of Ethics and HR 301: Guiding Principles and Expectations
- Standards of Conduct and Attachment "A" to that policy
- Conflict of Interest Policy and Attachment "A" to that policy
- Corporate Compliance Complaint Policy
- Reporting Compliance Concerns, Whistleblower & Anti-Retaliation Policy
- False Claims Act
- Document Retention Policy
- Documentation of Handwritten Changes
- Computer Usage Policy



I have read a copy of the following in-service required by PARC:

I have attended the following training required by PARC:

Corporate Compliance

Self-Study: I take full responsibility for all information presented. I have completed the self-instructional exercise and I have contacted my supervisor and received answers to any questions regarding the material before signing this acknowledgement.

On-site Training: I take full responsibility for all information presented. I received a copy of the Corporate Compliance Self-Study Guide at the training I attended today. I had the opportunity to ask questions and received answers from the trainer.

I fully understand the meaning of all information / policies and procedures in relation to my employment with PARC. I understand my personal duty to report compliance issues of concern and I am aware of PARC's system for reporting these concerns. I understand that if I fail to comply with PARC's Corporate Compliance Plan that I will be subject to disciplinary action up to and including termination.

NAME/PRINT NAME

SIGNATURE

DATE

SUPERVISOR'S NAME/PRINT

SIGNATURE

DATE

WORKSITE

*Please return this acknowledgement via interoffice mail (e-mail / fax copy not acceptable) to:

**PARC
Terravest Corporate Park
31 International Blvd.
Brewster, NY 10509
Attn: Training & Staff Development**