



# Camelot

A Resourceful Approach for Enduring Recovery

# Compliance Plan

## 2025-2026

**Approved: July 10, 2025**

**Issue Date:**

**Effective Date: July 10, 2025**

**Revision Date:**

**By: Camelot of Staten Island, Inc. Board of Directors**

---



# Camelot

A Resourceful Approach for Enduring Recovery

---



# Camelot

A Resourceful Approach for Enduring Recovery

## Table of Contents

<b>COMPLIANCE POLICY</b>	4
<b>PURPOSE</b>	4
<b>I. POLICY</b>	4
<b>II. COMMITMENT</b>	4
<b>III. RESPONSIBILITY</b>	5
<b>IV. POLICIES AND PROCEDURES AND STANDARDS OF CONDUCT</b>	5
<b>V. COMPLIANCE OFFICER AND COMPLIANCE COMMITTEE</b>	5
<b>VI. DISCIPLINE/ENFORCEMENT</b>	5
<b>VII. CAMELOT RESPONSE</b>	6
<b>VIII. DUE DILIGENCE</b>	6
<b>IX. NON-RETALIATION, NON-INTIMIDATION, AND WHISTLEBLOWER PROTECTIONS</b>	6
<b>ELEMENT 1: POLICIES AND PROCEDURES AND STANDARDS OF CONDUCT</b>	7
<b>ELEMENT 2: COMPLIANCE PROGRAM OVERSIGHT</b>	8
<b>I. THE ROLE OF THE COMPLIANCE OFFICER</b>	8
<b>REPORTING RELATIONSHIP</b>	8
<b>ROLES AND RESPONSIBILITIES</b>	8
<b>II. THE STRUCTURE, DUTIES, AND ROLE OF THE COMPLIANCE COMMITTEE</b>	9
<b>III. DELEGATION OF SUBSTANTIAL DISCRETIONARY AUTHORITY</b>	11
<b>ELEMENT 3: EDUCATION AND TRAINING</b>	12
<b>I. EXPECTATIONS</b>	12
<b>II. TRAINING TOPICS – GENERAL</b>	12
<b>III. TOPICS – TARGETED</b>	13
<b>IV. ORIENTATION</b>	13
<b>V. ATTENDANCE</b>	13



# Camelot

A Resourceful Approach for Enduring Recovery

<b>ELEMENT 4: LINES OF CONFIDENTIAL COMMUNICATION</b>	14
I. EXPECTATIONS	14
II. REPORTING PROCEDURE	14
III. PROTECTIONS	15
IV. POLICY OF NON-RETALIATION AND NON-INTIMIDATION	15
V. GUIDANCE	15
<b>ELEMENT 5: DISCIPLINE AND ENFORCEMENT OF COMPLIANCE STANDARDS</b>	16
I. DISCIPLINARY ACTION – GENERAL	16
II. DISCIPLINARY ACTION – SUPERVISORY	17
<b>ELEMENT 6: AUDITING AND MONITORING</b>	18
I. INTERNAL AUDITS	18
II. COMPLIANCE PLAN INTEGRITY	19
<b>ELEMENT 7: RESPONSE TO COMPLIANCE ISSUES</b>	20
I. VIOLATION DETECTION	20
II. REPORTING	20
III. RECTIFICATION	21
IV. RECORDKEEPING	21

Approved: July 10, 2025  
Issue Date:  
Effective Date: July 10, 2025  
Revision Date:  
By: Camelot of Staten Island, Inc. Board of Directors



# Camelot

A Resourceful Approach for Enduring Recovery



# Camelot

A Resourceful Approach for Enduring Recovery

## **CAMELOT OF STATEN ISLAND, INC. COMPLIANCE POLICY**

---

### **PURPOSE**

Camelot is committed to providing services of the highest quality and to being in full compliance with all federal, state, and local laws and regulations. As part of that commitment, Camelot has adopted this Compliance Plan and the Standards of Conduct as the basis of its efforts in fostering Camelot's culture that promotes responsible and honest conduct, transparency in all business transactions, and adherence to the laws and regulations of the government oversight agencies and funders.

For purposes of this Policy, the term "Affected Individuals" includes the Chief Executive Officer, Executive Management, Managers, Board of Directors, Employees, Consultants, Contractors, Agents, Subcontractors, Independent Contractors, Vendors, Interns/Students and Volunteers (hereafter referred to as "Affected Individuals").

### **I. POLICY**

It has been and continues to be the policy of Camelot to comply with all applicable Federal, State, and local laws and regulations, and payer requirements. It is also Camelot's policy to facilitate the prevention of improper or illegal activities, to provide mechanisms to detect any violations of laws and regulations and work to prevent, detect, and investigate issues related to fraud, waste, and abuse. To ensure this, Camelot has established this Compliance Plan and commits to maintaining an effective Compliance Program.

### **II. COMMITMENT**

Camelot is, and will remain, committed to our responsibility to conduct our business affairs with integrity based on sound ethical and moral standards. We will hold all Affected Individuals to these same standards.

Camelot is committed to maintaining and measuring the effectiveness of our Compliance Program and Standards of Conduct through monitoring and auditing systems reasonably designed to detect noncompliance by Affected Individuals.

Approved: July 10, 2025

Issue Date:

Effective Date: July 10, 2025

Revision Date:

By: Camelot of Staten Island, Inc. Board of Directors



# Camelot

A Resourceful Approach for Enduring Recovery

Camelot is committed to the prevention of improper or illegal activities and to provide mechanisms to detect noncompliance, including but not limited to, any violations of laws and regulations, healthcare program requirements, the Standards of Conduct and Camelot's policies and procedures. Camelot is committed to the prompt investigation and resolution of reported or detected noncompliance.

Camelot is committed to the performance of regular, periodic compliance audits by internal and/or external auditors who have expertise in Federal and State healthcare statutes, regulations, and healthcare program requirements.

### **III. RESPONSIBILITY**

All Affected Individuals shall acknowledge that it is their responsibility to report any instances of suspected or known noncompliance to their immediate supervisor, the Chief Executive, or the Compliance Officer without fear of retaliation, retribution, or intimidation. Failure to report known noncompliance or making reports that are not in good faith will be grounds for disciplinary action, up to and including termination of employment, contract, assignment, or appointment. Reports related to harassment or other workplace-oriented issues will be referred to Human Resources.

### **IV. POLICIES AND PROCEDURES AND STANDARDS OF CONDUCT**

Camelot will communicate its compliance standards and policies through required training and communication initiatives and distribution of this Compliance Plan and the Standards of Conduct to all Affected Individuals.

### **V. COMPLIANCE OFFICER AND COMPLIANCE COMMITTEE**

Camelot has appointed a Compliance Officer who is responsible for the overall operation of the Compliance Program. A Compliance Committee works with the Compliance Officer to implement and maintain an effective Compliance Program.

### **VI. DISCIPLINE/ENFORCEMENT**

This Compliance Plan will be consistently enforced through appropriate disciplinary mechanisms including, if appropriate, discipline of Affected Individuals responsible for failure to detect and/or report noncompliance.



# Camelot

A Resourceful Approach for Enduring Recovery

## **VII. CAMELOT RESPONSE**

Detected noncompliance, discovered through any mechanism, such as compliance auditing procedures and/or confidential reporting of noncompliance, will be responded to in an expedient manner. Camelot is dedicated to the resolution of such matters and will take all reasonable steps to prevent further similar violations, including any necessary modifications to the Compliance Plan and policies and procedures.

## **VIII. DUE DILIGENCE**

Camelot will, at all times, exercise due diligence with regard to background and professional license investigations for all Affected Individuals.

## **IX. NON-RETALIATION, NON-INTIMIDATION, AND WHISTLEBLOWER PROTECTIONS**

Camelot will not take any retaliatory action against an Affected Individual who, in good faith, reports actual or suspected noncompliance or illegal activities or for good faith participation in the Compliance Program.

Camelot will not take any retaliatory action against an employee if the employee discloses certain information about Camelot's policies, practices, or activities to a regulatory, law enforcement, or other similar agency or public official. Protected disclosures are those that assert that Camelot is in violation of a law that creates a substantial and specific danger to the public health and safety; or that constitute healthcare fraud under the law; or that assert that the employee, in good faith, believes constitutes improper quality of care.

Approved: July 10, 2025  
Issue Date:  
Effective Date: July 10, 2025  
Revision Date:  
By: Camelot of Staten Island, Inc. Board of Directors





# Camelot

A Resourceful Approach for Enduring Recovery

**Camelot's Compliance Program includes the following key elements.**

## **ELEMENT 1: POLICIES AND PROCEDURES AND STANDARDS OF CONDUCT**

---

To support the operation of Camelot's Compliance Program, policies and procedures are established to provide direction to Affected Individuals and address the following components of the Compliance Plan:

- Conflict of Interest
- Reporting and investigation of noncompliance
- Non-retaliation and non-intimidation
- False Claims Act and Whistleblower protections
- Compliance Program education and training
- Auditing and monitoring
- Billing errors and overpayments
- Kickbacks and business courtesies
- Discipline for noncompliance or failure to report
- Responding to governmental investigations

All Affected Individuals are expected to be familiar with and knowledgeable about the Compliance Program Policies and Procedures. The Policies can be accessed at [www.camelotcounseling.com](http://www.camelotcounseling.com).

The Standards of Conduct serves as a foundational document that describes Camelot's fundamental principles and values, and commitment to conduct its business in an ethical manner. The Standards of Conduct provides Affected Individuals with guidance on requirements for conduct related to their employment, contract, assignment or association with Camelot.

When any person knows or reasonably suspects that the expectations in the Standards of Conduct and the Compliance Program have not been met, this must be reported to the immediate supervisor, a member of Management, the Compliance Officer, member of the Compliance Committee, or the Chief Executive so that each situation may be appropriately dealt with. The Compliance Officer may be reached at (347) 378-9402. The Chief Executive can be reached at (718) 356-5100. Reports may be made in person; anonymously by phone, fax, mail, or email at [Compliance@CamelotCounseling.com](mailto:Compliance@CamelotCounseling.com).



# Camelot

A Resourceful Approach for Enduring Recovery

## ELEMENT 2: COMPLIANCE PROGRAM OVERSIGHT

---

### I. THE ROLE OF THE COMPLIANCE OFFICER

The Chief Executive and Board of Directors of Camelot designate Paul Costello as the Compliance Officer. (Extemporaneous)

The Compliance Officer has primary responsibility for Compliance Program development, implementation, monitoring, and evaluation for effectiveness.

### REPORTING RELATIONSHIP

The Compliance Officer has direct lines of communication to the Chief Executive, the Board of Directors, the Compliance Committee, and Camelot's legal counsel.

### ROLES AND RESPONSIBILITIES

The Compliance Officer's primary responsibilities include:

1. Overseeing and monitoring the adoption, implementation, and maintenance of the Compliance Program;
2. Developing and implementing Compliance Program policies and procedures and Standards of Conduct;
3. Reviewing and revising, periodically, the Standards of Conduct, the Compliance Program, and policies and procedures as changes occur within Camelot, and/or in the law, regulations, or governmental and third-party payers.
4. Evaluating the effectiveness of the Compliance Program, policies and procedures, and Standards of Conduct.
5. Developing, implementing, and monitoring the annual Compliance Work Plan.
6. Reporting, no less frequently than quarterly, to the Board of Directors, Chief Executive, and Compliance Committee on the progress of implementation of the Compliance Program.
7. Assisting the Chief Executive, Senior Leadership, Management, and the Compliance Committee in establishing methods to improve Camelot's quality of service and to reduce vulnerability to fraud, abuse, and waste.

Approved: July 10, 2025

Issue Date:

Effective Date: July 10, 2025

Revision Date:

By: Camelot of Staten Island, Inc. Board of Directors



# Camelot

A Resourceful Approach for Enduring Recovery

8. Developing, coordinating, and participating in a multifaceted educational and training program that focuses on the elements of the Compliance Program and seeks to ensure that all Affected Individuals, consistent with roles and any associated risk areas, are knowledgeable of, and comply with, pertinent Federal and State standards and Camelot's Standards of Conduct.
9. Ensuring that excluded individuals and entities are not employed or retained by Camelot.
10. Directing Camelot internal audits established to monitor effectiveness of compliance standards and the Compliance Program.
11. Independently investigating and acting on matters related to compliance, including the flexibility to design and coordinate internal investigations (e.g., responding to reports of problems or suspected violations) and any resulting corrective action with all departments, providers, and sub-providers, agents, and, if appropriate, independent contractors.
12. Coordinating internal investigations and implementing corrective action(s).
13. Developing policies and programs that encourage managers and employees to report suspected fraud and other improprieties without fear of retaliation.
14. Providing guidance to Management, medical/clinical program personnel, and individual departments regarding policies and procedures and governmental laws, rules, and regulations.
15. Maintaining a reporting system, including an anonymous means to report, and responding to concerns, complaints, and questions related to the Compliance Program.
16. Overseeing efforts to communicate awareness of the existence and contents of the Compliance Program.
17. Ensuring that independent contractors and contractors (recipient service provision, vendors, billing services, etc.) are aware of the requirements of Camelot's Compliance Program.
18. Acting as a resourceful leader regarding regulatory compliance issues. Actively seeking up-to-date material and releases regarding regulatory compliance issues.
19. Continuing the momentum of the Compliance Program and the accomplishment of its objectives.

## **II. THE STRUCTURE, DUTIES, AND ROLE OF THE COMPLIANCE COMMITTEE**

The Compliance Committee is appointed by the President of the Board of Directors and Chief Executive to advise and assist the Compliance Officer with the implementation of the Compliance Program. The Compliance Committee reports directly to the Chief Executive and Board of Directors.



# Camelot

*A Resourceful Approach for Enduring Recovery*

The Compliance Committee will meet on a regular basis, but not less than quarterly. Meeting minutes will be maintained by the Compliance Officer.

The Compliance Committee is responsible for the following:

1. Analyzing the regulatory environment where Camelot does business, including legal requirements with which it must comply.
2. Reviewing and assessing existing policies and procedures that address risk areas for possible incorporation into the Compliance Program.
3. Reviewing and monitoring Compliance Program training and education to ensure that they are effective and completed in a timely manner.
4. Ensuring that Camelot has effective systems and processes in place to identify Compliance Program risks, overpayments, and other issues and has effective policies and procedures for correcting and reporting such issues.
5. Working with departments to develop standards and policies and procedures that address specific risk areas and to encourage compliance according to legal and ethical requirements.
6. Coordinating with the Compliance Officer to ensure that the written policies and procedures and Standards of Conduct are current, accurate, and complete.
7. Developing internal systems and controls to carry out compliance standards, Standards of Conduct, and policies and procedures.
8. Coordinating with the Compliance Officer to ensure communication and cooperation by Affected Individuals on compliance-related issues, internal or external audits, or any other function or activity.
9. Developing a process to solicit, evaluate, and respond to complaints and problems.
10. Monitoring internal and external audits to identify issues related to non-compliance.
11. Implementing corrective and preventative action plans and follow-up to determine effectiveness.
12. Ensuring the development and implementation of an annual Compliance Work Plan.
13. Advocating for sufficient funding, staff, and resources to be allocated to the Compliance Officer to carry out duties related to the Compliance Program.
14. Ensuring that Camelot has appropriate systems and policies in place that effectively identify risks, overpayments, and other areas of concerns including fraud, waste, and abuse.
15. Monitoring and evaluating Camelot's Compliance Program for effectiveness at least annually and making recommendations for necessary modifications to the Compliance Program as applicable.

Approved: July 10, 2025

Issue Date:

Effective Date: July 10, 2025

Revision Date:

By: Camelot of Staten Island, Inc. Board of Directors



# Camelot

A Resourceful Approach for Enduring Recovery

16. Developing and implementing a Compliance Committee Charter. The Charter will outline the Compliance Committee's duties and responsibilities, membership, designation of a chairperson and frequency of meetings. The Charter will be reviewed and updated annually.

### III. DELEGATION OF SUBSTANTIAL DISCRETIONARY AUTHORITY

Any employee or prospective employee who holds, or intends to hold, a position with substantial discretionary authority for Camelot is required to disclose any name changes and any involvement in non-compliant activities including healthcare-related crimes. In addition, Camelot performs reasonable inquiries into the background of such applicants, all prospective employees, the Chief Executive and other senior administrators, Board members, interns, contractors, and vendors.

The following resources may be queried when conducting screening:

- a) The System for Award Management (SAM) available on the SAM website. The URL address is: <https://www.sam.gov>
- b) HHS/OIG List of Excluded Individuals and Entities. The URL address is: <http://exclusions.oig.hhs.gov/>.
- c) Medicaid Exclusions | Office of the Medicaid Inspector General. The URL address is: <https://omig.ny.gov/medicaid-fraud/medicaid-exclusions>
- d) Licensure and disciplinary record with NYS Office of Professional Medical Conduct (Physicians, Physician Assistants) (the URL address is <http://www.health.state.ny.us/nysdoh/opmc/main.htm>) and/or New York State Department of Education (other licensed professionals) (the URL address is <http://www.op.nysed.gov/opsearches.htm>).



# Camelot

A Resourceful Approach for Enduring Recovery

## 3: EDUCATION AND TRAINING

---

### I. EXPECTATIONS

Education and training are critical elements of the Compliance Program. All Affected Individuals are expected to be familiar with and knowledgeable about Camelot's Compliance Program and have a solid working knowledge of their responsibilities under the Compliance Program. Compliance Program Policies and Procedures and Standards of Conduct will be communicated to all Affected Individuals through required participation in training programs.

### II. TRAINING TOPICS – GENERAL

All Affected Individuals shall participate in training on the topics identified below:

- Camelot's Compliance Plan;
- Standards of Conduct and other related written guidance;
- Federal False Claims Act;
- New York False Claims Act;
- Whistleblower Protections;
- Risk areas and Camelot's experience;
- The role and responsibilities of the Compliance Officer and the Compliance Committee;
- Communication channels (name of Compliance Officer, reporting mechanisms, anonymous reporting mechanism);
- Camelot's expectations for reporting known or suspected fraud, waste, and abuse; illegal or unethical acts; actual or suspected violations of Federal or State laws and regulations; actual or suspected violations of the Standards of Conduct, the Compliance Program, and Camelot's policies and procedures; improper acts in the delivery or billing of services; and other wrongdoing (collectively referred to as "compliance concerns") and how Camelot responds to such reports including the investigation process and corrective actions;
- Camelot's disciplinary policy and standards; • Prevention of fraud, waste, and abuse; and
- Non-retaliation and non-intimidation policy.

All Affected Individuals will complete the Compliance Program training no less frequently than annually.



# Camelot

A Resourceful Approach for Enduring Recovery

## **ELEMENT**

Camelot will maintain an annual training plan. The training plan will, at a minimum, outline the subjects or topics for compliance training and education, the timing and frequency of the training, which Affected Individuals are required to attend, how attendance will be tracked, and how the effectiveness of the training will be periodically evaluated. The training plan will be reviewed by the Compliance Officer and Compliance Committee and updated as needed, but at minimum on an annual basis.

### **III. TOPICS – TARGETED**

In addition to the above, targeted training will be provided to all managers and any other employees whose job responsibilities include activities related to compliance topics, such as documentation of services and coding and billing procedures. Managers shall assist the Compliance Officer in identifying areas that require specific training and education.

### **IV. ORIENTATION**

As part of their orientation, each Affected Individual shall receive a written copy of the Compliance Plan and Standards of Conduct and be provided access to Compliance Program Policies and Procedures.

### **V. ATTENDANCE**

All education and training relating to the Compliance Plan will be verified by attendance and a signed acknowledgement of receipt of the Compliance Plan and Standards of Conduct.

Attendance at compliance training sessions is mandatory and is a condition of continued employment / contract / appointment / assignment with Camelot.



# Camelot

A Resourceful Approach for Enduring Recovery

## 4: LINES OF CONFIDENTIAL COMMUNICATION

---

### I. EXPECTATIONS

Open lines of communication between Camelot's Management, the Compliance Officer, and each Affected Individual subject to this Compliance Plan are essential to the success of Camelot's Compliance Program and commitment to comply with all applicable laws and regulations and the prevention of Medicaid or Medicare fraud, waste, and abuse.

All Affected Individuals must report compliance concerns. Failure to report is deemed misconduct and a violation of this requirement.

Every Affected Individual has an obligation to refuse to participate in any wrongful course of action and to report the actions according to the procedure listed below.

### II. REPORTING PROCEDURE

If an Affected Individual witnesses, learns of, or is asked to participate in any activities that are potentially in violation of this Compliance Plan and/or Standards of Conduct, he or she should contact the Compliance Officer, immediate supervisor, a member of the Management Team, or a member of the Compliance Committee. Reports may be made in person; by mail, phone, or email at [Compliance@Camelotcounseling.com](mailto:Compliance@Camelotcounseling.com); by calling a telephone line dedicated for the purpose of receiving such notification (347) 378-9402; or by mailing information to the attention of the Compliance Officer at 4442 Arthur Kill Road, Suite #4 Staten Island, NY 10309. Affected Individuals may also anonymously report to the Compliance Officer by (347) 378-9402.

Upon receipt of a question or concern, any supervisor, officer, or director shall document the issue at hand and report to the Compliance Officer. Any questions or concerns relating to potential non-compliance by the Compliance Officer should be reported immediately to the Chief Executive.

The Compliance Officer or designee shall record the information necessary to conduct an appropriate investigation of all complaints. If the Affected Individual was seeking information concerning the Standards of Conduct or its application, the Compliance Officer or designee shall record the facts of the inquiry and the nature of the information sought and respond as appropriate.





# Camelot

A Resourceful Approach for Enduring Recovery

## ELEMENT

### III. PROTECTIONS

Camelot shall, as much as is possible, protect the anonymity or identity of the Affected Individual who reports a compliance concern or raises a question about Camelot's Compliance Program and Standards of Conduct. Strict confidentiality regarding the reporting of compliance concerns will be maintained unless the matter is subject to a disciplinary proceeding, referred to, or under investigation by Federal, State, or local law enforcement, or disclosure is required during a legal proceeding.

### IV. POLICY OF NON-RETALIATION AND NON-INTIMIDATION

Camelot will not take any retaliatory action against an Affected Individual who, in good faith, reports a compliance concern, as defined by this Plan or for good faith participation in the Compliance Program, including but not limited to:

- Reporting potential issues;
- Investigating issues;
- Self-evaluations;
- Audits;
- Remedial actions; and
- Reporting to appropriate officials as provided in sections 740 and 741 of the New York State Labor Law.

Any threat of retribution, retaliation, or intimidation against a person who acts in good faith pursuant to their responsibilities under the Compliance Plan is acting against Camelot's Compliance Policy. Discipline, up to and including termination of employment, contract, appointment, or assignment, will result if such retribution, retaliation or intimidation is proven.

Affected Individuals who believe they have been subject to retribution, retaliation and/or intimidation for reporting a compliance concern or for good faith participation in the Compliance Program shall report the actions to the Compliance Officer who shall conduct an investigation into the allegation in accordance with Element 7 of this Compliance Plan (Response to Compliance Issues).

### V. GUIDANCE



# Camelot

A Resourceful Approach for Enduring Recovery

Any Affected Individual may seek guidance about the Compliance Plan or Standards of Conduct at any time by following the reporting mechanisms outlined above.

## **5: DISCIPLINE AND ENFORCEMENT OF COMPLIANCE STANDARDS**

---

### **I. DISCIPLINARY ACTION – GENERAL**

Affected Individuals who fail to comply with Camelot's Compliance Program and Standards of Conduct, or who, upon investigation, are found to have committed illegal or unethical acts or violations of applicable Federal and State laws and regulations, the Compliance Program, the Standards of Conduct, or Camelot's policies and procedures, will be subject to appropriate disciplinary action, up to and including termination of employment, contract, assignment, or appointment with Camelot.

When the determination is made that a compliance violation occurred involving a contractor or vendor, the Compliance Officer will notify the Chief Executive and work collaboratively to determine and execute the appropriate corrective action.

Camelot will apply progressive discipline consistent with the violation. Examples of the disciplinary action that may be taken in accordance with the nature and scope of the infraction include but are not limited to: (a) verbal counseling or warning; (b) counseling with written warning; (c) retraining; (d) reassignment or demotion; (e) suspension without pay; and (f) termination of employment, contract, assignment, or appointment. Camelot will consider intentional or reckless behavior as being subject to more significant discipline.

The following actions will result in more significant disciplinary action:

- Authorization of or participation in actions that violate Federal or State laws, regulations, the Compliance Program, Standards of Conduct, or any related policies and procedures;
- Failure to comply with Camelot's policies governing the prevention, detection, or reporting of fraud and abuse;
- Falsification of records;
- Submitting or causing to submit a false claim;
- Failure to report a violation by a peer or subordinate;



# Camelot

*A Resourceful Approach for Enduring Recovery*

## **ELEMENT**

- Failure to cooperate in an investigation; and
- Retaliation/intimidation against an individual for reporting a possible violation or participating in an investigation.

Any discipline will be appropriately documented in the Affected Individual's file, along with a written statement of reason(s) for imposing such discipline. Such documentation will be considered during an employee's regular and promotional evaluations.

The Compliance Officer will maintain a written record of all disciplinary actions taken against Affected Individuals related to non-compliance and violations, including verbal warnings, and will reference these records when necessary to ensure consistency in application of disciplinary measures. The Compliance Officer will provide a report on disciplinary actions taken to the Compliance Committee and the Board of Directors.

## **II. DISCIPLINARY ACTION – SUPERVISORY**

Managers and supervisors will be disciplined for failure to adequately instruct their subordinates or failure to detect noncompliance with applicable policies and procedures and legal requirements where reasonable diligence on the part of the manager or supervisor would have led to the earlier discovery of any problems or violations and would have provided Camelot with the opportunity to correct them.



# Camelot

A Resourceful Approach for Enduring Recovery

## 6: AUDITING AND MONITORING

---

### I. INTERNAL AUDITS

Ongoing evaluation is critical in detecting non-compliance and will help ensure the success of Camelot's Compliance Program. An ongoing auditing and monitoring system, implemented by the Compliance Officer and in consultation with the Compliance Committee, is an integral component of Camelot's auditing and monitoring systems.

On an annual basis, the Compliance Officer, in conjunction with the Chief Executive, Senior Management, and Compliance Committee, will develop an audit plan based on a Camelot risk assessment.

This ongoing auditing and monitoring will evaluate at minimum, the following risk areas:

- Billings;
- Payments;
- Ordered services;
- Medical necessity;
- Quality of care;
- Governance;
- Mandatory reporting;
- Credentialing;
- Contractor, subcontractor, agent, or independent contract oversight;
- Review of contracts and relationships with contractors, specifically those with substantive exposure to government enforcement actions;
- Review of documentation and billing relating to claims made to Federal, State, and thirdparty payers for reimbursement;
- Compliance training and education;
- Effectiveness of the Compliance Program: and
- Other risk areas that are or should reasonably be identified by Camelot through its Camelot experience

The audits and reviews will examine Camelot's compliance with specific rules and policies through on-site visits, personnel interviews, general questionnaires (submitted to employees and contractors), and record reviews.

Results of all auditing and monitoring activities will be reported to the Compliance Committee and Board of Directors.



# Camelot

A Resourceful Approach for Enduring Recovery

## ELEMENT

### II. COMPLIANCE PLAN INTEGRITY

Additional steps to ensure the integrity of the Compliance Plan will include:

- The Compliance Officer will be notified immediately in the event of any visits, audits, investigations, or surveys by any Federal or State agency or authority and shall immediately receive a photocopy of any correspondence from any regulatory agency charged with licensing Camelot and/or administering a Federally or State-funded program or county-funded program with which Camelot participates.
- Establishment of a process detailing ongoing notification by the Compliance Officer to all appropriate personnel of any changes in laws, regulations, or policies, as well as appropriate training to assure continuous compliance.



# Camelot

A Resourceful Approach for Enduring Recovery

## 7: RESPONSE TO COMPLIANCE ISSUES

---

### I. VIOLATION DETECTION

Camelot maintains a formal confidential and anonymous compliance reporting process to encourage the reporting of any compliance concerns. Affected Individuals must promptly report any compliance concerns to Compliance Officer, the immediate supervisor, a member of Management, or a member of the Compliance Committee. Service recipients, vendors, and any party conducting business with Camelot may report compliance concerns to the Compliance Officer through the confidential or anonymous reporting process.

As part of its Compliance Program, Camelot will ensure that all reports of compliance concerns are immediately and objectively investigated and resolved promptly. Such investigations may be conducted by the Compliance Officer, members of the Compliance Committee, other employees or external parties as indicated or recommended by the Compliance Officer, the Chief Executive or legal counsel.

The Compliance Officer will take immediate measures to secure relevant evidence or documentation and will ensure the confidentiality of any information obtained from a report, interview or through an investigation, unless otherwise required by law.

Unless a potential conflict of interest exists, the Compliance Officer will inform the Chief Executive of any pending investigations. The Compliance Officer or Chief Executive will arrange to retain legal counsel, as deemed appropriate.

### II. REPORTING

The results of the investigation and remedial actions will be communicated confidentially to the Chief Executive, members of the Board of Directors, and other employees based on a need-to-know basis. The Compliance Officer shall report to the Compliance Committee regarding each investigation conducted unless conducted under attorney privilege.

At the conclusion of an investigation involving legal counsel, they shall issue a report to the Compliance Officer, Chief Executive, and Compliance Committee summarizing their findings, conclusions, and recommendations and will render an opinion as to whether a violation of the law has occurred. The report will be reviewed with legal counsel in attendance. Any additional action will be on the advice of counsel.



# Camelot

A Resourceful Approach for Enduring Recovery

## ELEMENT

### III. RECTIFICATION

If the Compliance Officer, in consultation with legal counsel, identifies credible evidence or credibly believes that a State or Federal law, rule, or regulation has been violated, the Compliance Officer will promptly report such violation to the appropriate governmental entity, where such reporting is otherwise required by law, rule, or regulation.

If Camelot identifies that an overpayment was received from any third-party payer, the appropriate regulatory (funder) and/or prosecutorial (attorney general/police) authority will be appropriately notified with the advice and assistance of counsel.

It is Camelot's policy to not retain any funds received from overpayments. Overpayments will be reported and refunded to Medicaid and Medicare in accordance with the appropriate self-disclosure protocols and any required time frames.

In instances where it appears that an affirmative fraud may have occurred, appropriate amounts shall be returned after consultation and approval by involved regulatory and/or prosecutorial authorities. Systems shall also be put in place to prevent such overpayments in the future.

### IV. RECORDKEEPING

Regardless of whether a report is made to a governmental agency, the Compliance Officer shall maintain a record of the investigation, including copies of all pertinent documentation. The Compliance Officer will organize the information so that Camelot can determine if an infraction occurred. The Compliance Officer will securely maintain all notes of the interviews, all evidence and review of documents as part of the investigation file. This record will be considered confidential and not released without the approval of the Chief Executive or legal counsel.



# Camelot

A Resourceful Approach for Enduring Recovery

*\*Addendum as of July 2025*

## **METHADONE POLICY**

Camelot Counseling of Staten Island is a stabilization, rehabilitation, and reintegration program, supporting recovery and independent living for residents who may be prescribed methadone by an OTP. We require staff to observe the following guidelines for overseeing the safety and clinical care for those clients.

### **Compliance**

Camelot of Staten Island follows OASAS (Sec. 820), DEA (21 CFR Sec. 1301.72) and federal OTP laws (42 CFR Sec.8.12(i))

In compliance with the OASAS, state, and federal guidelines, Camelot of Staten Island offers medically assisted treatment including but not limited to methadone. In order to support clients' medication assisted treatment ("MAT") as part of their recovery plan, Camelot of Staten Island will coordinate with clients' Opioid Treatment Program ("OTP")/ methadone clinic to ensure continuity of care following OTP recommendations for clients' treatment needs.

### **Storage**

All methadone doses are stored in a secure lockbox in a locked cabinet in the medical office. The office is only accessible to authorized personnel. The office is always locked or supervised by staff. The office is also monitored by camera located outside the office entrance. A count of the medication is conducted regularly, and discrepancies reported immediately to the program director and appropriate authorities.

### **Transport**

Camelot transports methadone-prescribed clients to the Opioid Treatment Program (OTP) with a staff escort. On Saturdays Camelot staff are given take home doses by the OTP to be administered on Sundays when the OTP is closed. During this transport, the methadone doses are kept in a lockbox for added security. Camelot medical staff dispenses and supervises the





# Camelot

*A Resourceful Approach for Enduring Recovery*

**ELEMENT**

administration of methadone on Sundays. On Monday mornings, the empty bottles are returned securely by Camelot staff, also within a locked and secured lockbox.



# Camelot

A Resourceful Approach for Enduring Recovery

*\*Addendum as of July 2025*

## **VISITORS POLICY**

- Visitors are to be approved in staff meetings. Program directors will provide a list to the receptionist of approved visitors for the day. When signing in, it is required for approved visitors to identify who they will be meeting with.
- Visitors must sign in at the reception area upon arrival at the facility.
- On the sign in sheet visitors must include their name, time they are signing in, and who they are coming to visit.
- When the visit is complete, visitors must sign out before leaving.
- Any packages that a visitor brings in must be searched by the staff on duty to ensure there are no contraband/prohibited items enter the facility.
- If a visitor is not on the approved list, the staff on duty will advise them that they will not be allowed to visit that day.
- Whoever the visitor plans to meet with must wait for them at the reception area and be escorted to the location where the visit will take place.



# Camelot

A Resourceful Approach for Enduring Recovery

## ELEMENT

*\*Addendum as of July 2025*

### CONTRABAND POLICY

Any item that may endanger the health, safety, and welfare of Camelot's Staff and Clients is considered contraband. Contraband of any kind will not be permitted in or on the property of any Camelot facility.

Examples of contraband are:

- Illicit Drugs
- Prescription and non-Prescription medication\* (See paragraph 1 below)
- Illicit Drug paraphernalia (e.g., Syringe, pipes, rolling papers etc.)
- Offensive materials (pornographic, racist, or offensive to any protected class)
- Tobacco or implements linked to tobacco use (e.g., Cigarettes, vaping pens, etc.)
- Weapons (guns, gun parts, knives, razor blades, box cutters, tasers, etc.)
- Inflammatory materials (lighters, match books, etc.)

### Drugs

It is strictly prohibited for a Service Recipient, staff person, or contractor/vendor to have any non-prescribed controlled substance in or on the property of any Camelot facility. If a Service Recipient has any prescribed medication, that medication should be handed to the Medical Staff on site. Any staff person who has any prescribed controlled substances must have it locked



# Camelot

*A Resourceful Approach for Enduring Recovery*

away with their personal belongings, out of reach and sight of Service Recipients and other staff members.

Any Service Recipient found with any non-prescribed controlled substance, after their date of admission, will have the controlled substance confiscated in the presence of two staff members and will face disciplinary action up to and including being administratively discharged from the program.

Any staff person found with any controlled substance that has not been prescribed by medical personnel will face disciplinary action up to and including termination of employment.

Drug paraphernalia is defined as anything that is used to produce, conceal, and consume an illicit drug. That is including but not limited to bongs, roach clips, miniature spoons, syringes, and various types of pipes. Any Service Recipient found with any drug paraphernalia will have the paraphernalia confiscated in the presence of two staff members and will face disciplinary action up to and including being administratively discharged from the program.

Any Staff Member found with any drug paraphernalia will be asked to leave for the day and may face disciplinary action up to and including termination of employment.

## **Offensive Material**

Offensive materials of any kind related to any protected class (race, religion, color, national origin, age, disability, marital status, sexual orientation, political affiliation, gender/gender identity or status of being transgender) are strictly prohibited.

It is prohibited to possess and/or conceal any offensive material such as pornographic photos, books, magazines, and posters. Said material will be confiscated and destroyed in the presence of two staff members.

Any Service recipient or staff person found to have any offensive materials regarding any protected class, will face disciplinary up to and including termination and/or discharge from the program.



# Camelot

A Resourceful Approach for Enduring Recovery

## ELEMENT

### **Weapons and Inflammatory Items**

It is strictly prohibited for any Service Recipient and/or staff member to possess any weapons in or on the property of any Camelot facility. Weapons include but are not limited to guns and gun parts, knives, box cutters\*, razors, and tasers. It is everyone's responsibility to help maintain the safety and wellbeing of all Camelot Staff and Service Recipients. Violence or threats of violence of any kind will not be tolerated by anyone within Camelot.

If anyone, staff, and Service Recipients included, is found with a weapon in their possession, local authorities may be called (Mary what do you think?) and said person will face disciplinary action up to and including termination and/or being administratively discharged from the program.

Inflammatory Items are prohibited from being on Camelot property. Inflammatory items include but are not limited to lighters, match books, torches, lighter fluid, etc. If anyone, staff, and Service Recipients included, is found with any inflammatory items in their possession, may face disciplinary action up to and including termination and/or being administratively discharged from the program.



# Camelot

A Resourceful Approach for Enduring Recovery

*\*Addendum as of July 2025*

## **T-SHIRT POLICY**

### **Visual Progress Identification System Using Color-Coded Shirts**

**Policy Title: Color-Coded Shirt System for Therapeutic Engagement Program Type: 820 Residential**

#### **Policy Purpose**

To implement a strength-based visual identification and motivational tool that enhances treatment engagement, personal empowerment, and community connection. The color-coded shirt system represents an individual's evolving participation within Camelot's Community reinforcing a culture of growth, support, and shared responsibility.

#### **Policy Overview**

Camelot of Staten Island, Inc. adopts a structured, affirming color-coded shirt system as a visual representation of each participant's developmental journey. This system is grounded in person centered planning and designed to recognize individual strengths, support peer relationships, and help staff tailor support in alignment with each person's current stage of engagement.

#### **Color Designation and Stage Descriptions**

- Blue Shirt – Orientation & Engagement Phase Worn by participants who are newly engaging in the community. Individuals are building self-awareness, learning program expectations, and beginning to form connections with peers and staff. This phase celebrates the courageous first steps into recovery and community living.
- White Shirt – Leadership & Support Phase Recognizes individuals who demonstrate consistency, personal insight, and commitment to community wellness. Participants in this stage provide mentorship to peers, model healthy behavior, and contribute meaningfully to group dynamics and program activities.



# Camelot

A Resourceful Approach for Enduring Recovery

## **ELEMENT**

· Gold Shirt – Reflective Learning & Support Phase Represents a focused period of personal reflection and enhanced support, offered when individuals are exploring new strategies for maintaining wellness and growth. This is a non-punitive, restorative phase that emphasizes learning from experience and re-engaging with personal goals. The gold shirt is not a consequence but a visible affirmation of continued support and opportunity.

## **Movement Between Phases**

· Progression Guidelines: Individuals advance between phases by meeting collaborative goals identified in their treatment plans, such as active participation, emotional growth, leadership, and mutual support.

· Supportive Re-Engagement: If a participant enters a period of increased need, they may return to an earlier phase to receive enhanced guidance and structure. This is framed as a proactive step in maintaining stability—not as regression—and reflects Camelot’s trauma-informed, person-first approach. All changes are based on clinical assessment and discussed openly with the participants.

## **Clinical and Operational Applications**

o Blue: Emphasize orientation, safety, and confidence-building.

o White: Offer leadership opportunities and self-directed therapeutic challenges.

o Gold: Provide enhanced clinical support, promote reflection, and reinforce strengths-based planning.

· Community Engagement: The system strengthens peer bonds by fostering natural mentoring relationships and shared identity among those at similar stages. This helps reinforce the therapeutic alliance and a sense of belonging.

· Empowered Leadership: Participants in the white shirt phase are invited to model positive community values and provide encouragement to peers, contributing to the stability and culture of the program.

Documentation and Reflective Practice



# Camelot

*A Resourceful Approach for Enduring Recovery*

- All phase transitions are collaboratively planned and documented in the participant's record, with corresponding rationale and clinical notes.
- Changes are reviewed in case conferences and during person-centered planning discussions.
- Celebratory acknowledgments may be held to recognize phase transitions and promote encouragement among peers.

## **Policy Review Cycle**

This policy shall be reviewed annually or as needed to ensure alignment with current regulatory standards, trauma-informed care models, and person-centered best practices.