



## CODE OF ETHICS AND STANDARDS OF CONDUCT

The first and most significant element of Family Service League's relationships with its clients, regulatory agencies, and the communities it serves is trust. In recognition of the importance of that trust, we have adopted this policy to promote honest and ethical conduct, ensure compliance with applicable laws and regulations, and foster a culture of integrity and accountability consistent with the mission, goals, and policies adopted by Family Service League.

Family Service League, its staff, and Board of Directors are required to:

- Ensure the highest standards of honest, ethical conduct while at work and while conducting FSL business.
- Adhere to the most stringent standards of compliance with all applicable laws and regulations, including legal requirements relating to the protection of confidential information, billing, claims processing, record keeping, reporting, and other activities.
- Abide by all FSL policies and procedures, as well as relevant program/department policies and procedures. For more information, refer to *HIPAA Policies, the FSL Compliance Policy Manual and Compliance Policies*.
- Avoid conflicts of interest in any Agency directed relationships and contractual agreements by adhering to the Agency's Conflict of Interest Policy, and ensuring that all contractual and other relationships are clearly defined, impartially conducted, and unaffected by personal gain of any kind.
- Ensure the highest standards of health, safety, and security for all staff and clients in its workplace.
- Respect the privacy rights of all staff and clients and ensure the protection of their confidential and protected health information. For more information, refer to the *HIPAA Privacy and Security Policies*.
- Require that staff who are licensed clinical practitioners abide by all ethical standards and principles applicable to their respective professions.
- Provide the highest quality of services to the broadest possible range of individuals and families who participate in FSL programs.
- Provide all services within the parameters of clearly defined contracts that are fully explained to all clients at the point that service is initiated.



- Promote the well-being of clients and provide all services consistent with the parameters of valid, informed consent.
- Take action when the best interests of a child or other vulnerable person are not being protected by parties responsible for protecting those interests.
- Ensure that relationships with clients remain professional at all times; with clear, appropriate, and culturally sensitive boundaries. This includes a strict prohibition on staff engaging in any personal relationship (i.e. friendship, romantic, or otherwise and regardless of whether communications are in-person, through social media, text-messaging or otherwise) with any Family Service League client, regardless of whether the employee directly provides services to such client.
- Disclose a prior or current relationship with a client immediately and ensure the employee does not provide treatment to or access records of a friend or family member.
- Conduct all clinical activities within clearly established guidelines that are consistent with sound treatment planning and promote protection from risk.
- Take responsibility for identifying and reporting incidents of suspected or actual deviations from these standards, without threat of reprisal.

Should an employee become aware of any potential or actual ethical violations, they should discuss the problem with their immediate supervisor. In most cases, the supervisor will be able to provide an immediate resolution. Should the potential violation involve the employee's immediate supervisor, or the employee does not find resolution at that level, they should consult the next level of management. In the case where the issue is not resolved at the next level, or it may not be appropriate to discuss the issue with the next level of management, the employee should contact the Human Resources Department. Employees may also report suspected or actual ethical violations anonymously via the Compliance Hotline. For more information, refer to the *Compliance Policy Manual*.

FSL must adhere to stringent policies from various government agencies regarding arrests and convictions during employment. Accordingly, if an FSL employee is arrested, charged or convicted of any crime during their employment, they must notify their supervisor immediately, but no later than three days after such arrest, charge, or conviction. Upon such notice, FSL will conduct an investigation and determine appropriate corrective action, if necessary, up to and including termination of employment, to the extent permitted and in accordance with applicable law. Failure of an employee to notify their supervisor in accordance with this policy will result in immediate termination of employment.

### **Exclusion or Suspension from Federally Funded Healthcare Program**



The Office of Inspector General (OIG) has been given the authority to exclude from participation in Medicare, Medicaid and other Federal healthcare programs individuals and entities who have engaged in fraud, waste or abuse, and to impose civil monetary penalties (CMPs) for certain misconduct related to federal healthcare programs (sections 1128 and 1156 of the Social Security Act). Any items and services furnished by, or at the direction of, an excluded individual or entity are not reimbursable under Federal healthcare programs. This prohibition applies even when the federal payment itself is made to another provider, practitioner or supplier that is not excluded.

All FSL employees, including the President and Chief Executive Officer, members of Executive Management and the Board of Directors, and interns, have an affirmative responsibility to notify the Chief Legal and Compliance Officer (CLCO), and Chief Human Resources Officer (CHRO) immediately, or by their next scheduled work day, if they have been charged with a criminal offense related to a healthcare program or are found to be subject to exclusion from a federal healthcare program. Failure to notify the CLCO and CHRO in accordance with this policy may result in immediate termination of employment.