

## ETHICAL CODE OF CONDUCT

### PURPOSE:

To reinforce that North Country Health Consortium (NCHC) maintains high standards for professional behavior from its employees in the performance of their job duties and responsibilities.

To address ethical issues in the business provision of service delivery, professional responsibilities, billing, marketing, exchange gratuities, personal fundraising, personal property, contractual relationships, admissions practices and human resources.

### POLICY:

All employees are expected to maintain acceptable job performance and to conduct themselves in a professional and courteous manner. Professional service providers are expected to comply with any codes for professional conduct or ethical behaviors adopted by their respective licensure or certification authorities.

The organizational ethical codes of conduct statement shall be posted and communicated to all members of the workforce, persons served, and other stakeholders.

While it is not practical to compile an inclusive summary of behavioral expectations, examples are provided to clarify the intent of this policy:

- **Attire:** To present a professional image to our clients and the public, all employees are required to wear clothing at the workplace appropriate for their position responsibilities at any given time.
- **Client and participant welfare:** All employees are expected to respect the integrity and protect the welfare of the person or group with whom the employee is working, demonstrate a genuine interest in all clients, and be dedicated to the best interest of the client and their needs.
- **Transition / Discharge of Persons Served:** Employees must be willing to recognize when it is in the best interest of the client, to discharge them from NCHC services or to refer them to another program or individual.
- **Confidentiality:** All employees are expected to maintain confidentiality of client identifying information, and to abide by all applicable federal, state, or local laws and regulations which address issues of privacy or confidentiality of records. Paramount among these laws is the Federal Confidentiality Regulations, 42 CFR Part 2, *Confidentiality of Alcohol and Drug Abuse Patient Records*, and the HIPAA Privacy Regulations, 45 CFR Parts 160 and 164.
- **Nondiscrimination:** All employees are expected to refrain from discrimination on the basis of race, ethnicity, age, color, religion, creed, gender, gender identity, national origin, sexual orientation, marital status, pregnancy status, veteran status, financial condition, handicap, developmental disability, and HIV infection, AIDS - related complex or AIDS. This includes discrimination against other agency employees, any current, former, or potential clients or service recipients, and others in the community with whom an employee may interact.
- **Professional relationships:** All employees are expected to maintain a professional relationship with clients and others participating in agency services. Sexual advances or sexual activity with clients or service recipients is not permitted.

- **Scope of practice:** Professional service providers are expected to function within the scope of their licensure or certification, and in accordance with any specific areas of competence or other such declarations defined through their licensing or certifying authority.
- **Professional Services:** The basis for reimbursement for services rendered is the records that are prepared. Employees are to take care to ensure that records:
  - Present a true and accurate representation of what services are offered
  - Are appropriately dated, accurately reflect content of service and provide the actual time spent in rendering the service
  - Indicate the name(s) of the provider and/or supervisor responsible for the provision/supervision of services
  - Are completed, data entered, accurately billed and filed in a timely manner
- **Employee Expectations:**
  - Provide timely and accurate reports of time that is expended in agency-related activities
  - Claim only those expenses, which are authorized and/or are reasonably related to their job descriptions
  - Refrain from shifting time or costs to inappropriate contracts or programs
  - Assess their own personal strengths, limitations, biases, and effectiveness on a continuing basis; continuously strive for self-improvement; have a personal responsibility for professional growth through further education and training
  - All employees are expected to participate cooperatively with supervision, peer review and quality assurance/improvement requests and activities
  - Remain alert to and report actions by any employee, regardless of position, which are illegal, unethical, or in violation of the standards of the agency and relevant professional Code of Ethics
- **Witnessing of Documents:**
  - Employees shall not act as a witness to documents such as Power of Attorney, guardianship, advance directives, and/or agency contracts without the expressed written approval of the Chief Executive Officer.
  - Personnel are authorized to countersign documents such as intake forms, authorizations (i.e. release of information form), treatment plans, etc. as directly related to their job duties.
- **Business Practices:**
  - NCHC will utilize the Corporate Compliance Officer to ensure that it conducts business in an ethical manner and ensure that any business practices that are questionable are thoroughly investigated.
  - All financial, purchasing, personnel, facility development and information technology practices shall comply with local, state and federal law and guidelines.
- **Marketing Practices:**
  - NCHC will conduct marketing practices in an honest and factual manner. Marketing materials and practices will in no way mislead the public or misrepresent NCHC's abilities to provide services.
  - NCHC will not claim any service outcomes unless represented by valid and reliable outcome data and/or research studies.
  - NCHC will not utilize monetary rewards or gifts to any potential consumer of services in an attempt to entice them to enter programs.
  - NCHC employees will be honest and truthful in all marketing and advertising practices pertaining to the business practices of the organizations service delivery system.

- **Potential Conflicts of Interest:**
  - No consumer will be hired or placed in an employee/employer relationship with NCHC while an active participant in programming.
- **Coding, Billing, and Accounting:**
  - NCHC employees involved in coding, billing, documentation and accounting for consumer care services for the purpose of governmental, private or individual payers will comply with all applicable state and federal regulations and organizational policies and procedures.
  - NCHC will only bill for services rendered and shall seek the amount to which it is entitled.
  - Supporting clinical documentation will be prepared for all services rendered. If the appropriate and required documentation has not been provided, then the service has not been rendered.
- **Exchanges of Gifts, Money and Gratuities:**
  - No Personnel or other persons associated with North Country Health Consortium will accept excessive gifts of money or material values, favors remuneration, or other consideration from any client, individual, or organization that does business with North Country Health Consortium.
- **Solicitation, Distribution and Personal Fund Raising:**
  - To avoid unnecessary avoidances and work interruptions, solicitation and personal fundraising by a staff member of another staff member or client is prohibited on working time.
  - Staff member distribution of literature, including handbills, in work areas during the work hours of any staff member involved is prohibited.
  - Trespassing, soliciting or distribution of literature by non-staff member on these premises is prohibited at all times.
- **Personal Property:**
  - All personnel shall respect and safeguard the personal property of clients, visitors, and other personnel as well as the property of North Country Health Consortium. Employees will not use or allow the use of North Country Health Consortium property or equipment other than activities approved by the organization. North Country Health Consortium employees shall not exchange personal property with clients. Theft and destruction of property may be addressed through treatment planning (clients), disciplinary action (personnel, and/or by contacting law enforcement, as appropriate). North Country Health Consortium is not responsible for personal property that is not safeguarded or is left unattended.
- **Use of Social Media:**
  - All personnel shall adhere to and strictly follow the guidelines outlined in the NCHC social media policies:
    - Staff shall follow acceptable use of social media as it relates to NCHC.
    - Staff shall only make posts that positively reflect on NCHC and its activities.
    - Staff shall ensure privacy and confidentiality considerations, such as seeking written permission or consent from persons served for posts or pictures that include them and not sharing information about persons served in personal posts.
    - Staff shall not engage on social media during work hours.
    - Leadership shall monitor social media to ensure adherence to NCHC's expectations.

- Leadership will use social media searches as part of NCHC's hiring and applicant's vetting process.
- **Other policies and procedures:** All employees are expected to act in accordance with agency policies and procedures, and other personnel directives established by the Chief Executive Officer. Inciting others through false statements, rumors or malicious gossip; willful falsification of records; unauthorized absenteeism; tardiness; theft or embezzlement; or other waste or abuse of materials, property, equipment or working time are not permitted.
- **Discipline and Mandatory Sanctions:**
  - The standards of the agency's Ethical Code of Conduct, as well as those of professional disciplines, are important to the agency and must be taken seriously by all employees. Accordingly, violations of these standards and/or of those of related disciplines will not be tolerated and, in accordance with agency procedures outlined in the Employee Handbook may result in disciplinary action up to and including termination.