

Familylinks' Code of Conduct

Contents

Letter from our President & Chief Executive Officer	2
Mission	3
Vision.....	3
Values.....	3
Overview	3
Compliance Team.....	4
Reporting Structure	4
Non-Retaliation	5
Compliance with Agency Policies.....	5
Compliance with Laws and Regulations.....	5
Child Protective Services Law	5
Health Information Portability and Accountability Act (HIPAA)	6
Government Investigations.....	6
Subpoenas.....	6
Confidentiality.....	6
Preventing Fraud, Waste, and Abuse.....	6
Diversity & Inclusion	7



Letter from our President & Chief Executive Officer

Dear Team and Stakeholders,

The information that follows in this document speaks to the heart of our work here at Familylinks. It sets expectations about how we conduct ourselves which creates our culture, and our culture is the foundation of the human services work that we do.

I believe that everyone enters our doors with the absolute best of intentions to do magnificent work, offer great services and treat everyone here at Familylinks like members of their own family – with dignity and respect. From time to time, and for any number of reasons, we may fall short of this expectation and issues arise. We support a “see something – say something” culture here, and we want you to report things that simply do not feel right. You may not know the policy, rule or law that is not being followed – don't worry, please report your concern and we will take the appropriate action. If you would like to have follow-up after your report, please tell us and we will share as much information as is appropriate regarding how we followed-up on your concern.

Our leadership team, including compliance, is always available for a conversation, to answer questions, or listen to what you have to say. As an employee or stakeholder, you are an important part of our team and contribute to our ability to serve the community in many ways.

Thank you for taking time to review this Code of Conduct, embrace the direction it provides, and for the work you do to ensure that the children, youth, adults, and seniors we serve are receiving the best possible care, every single day.

Sincerely,

Stacey Vaccaro, FACHE
President & CEO

Mission

Familylinks exists to positively impact lives through integrated community, behavioral and social programs.

Vision

Thriving communities of healthy and strong people.

Values

We genuinely care about others

- We are kind
- We welcome and respect differences
- We pay attention to the unique needs of each individual

We communicate openly and respectfully

- We share information transparently across the organization
- We have difficult conversations with care

We celebrate success

- We inspire others to have hope for the future
- We recognize and celebrate good work and accomplishments

We embrace change

- We innovate
- We try new things with courage

We are committed and accountable

- We take initiative to solve problems and lead others to do the same
- We are reliable
- We learn, grow and change from our successes and our failures

We collaborate

- We strive for collaborative partnerships to produce the best results
- We create our best results using all of our internal resources

Overview

The Code of Conduct (“Code”) is a tool to help create and maintain a culture that embodies our values. It is a set of rules that clearly and concisely outline the types of behaviors that are expected in the workplace. Familylinks’ employees and board members are dedicated to upholding the mission and vision of our organization. It is also the responsibility of these individuals to report any violations of the Code. Violation of the Code may result in disciplinary action up to and including termination.

To provide guidance, separate policies and procedures have been created to provide additional information and are available on Familylinks' SharePoint.

Compliance Team

The compliance team, along with the Board and executive team, are responsible for creating an organizational culture that follows the guidelines in the Code of Conduct.

The Compliance Team includes:

<p>The Compliance/Privacy Officer is responsible for implementing the Plan and the prevention and investigation of potential breaches of protected health information.</p> <ul style="list-style-type: none">• Monique Jackson, COO• msjackson@familylinks.org• 412-942-0514	<p>The Security Officer is responsible for protecting and monitoring the use of protected health information.</p> <ul style="list-style-type: none">• James Needles, CIO• jneedles@familylinks.org• 412-942-0449
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Reporting Structure

If you are aware of or suspect violations of the Code, you have a duty to seek guidance or report such misconduct. Familylinks will investigate all credible reports of potential misconduct. There are multiple ways to report:



Employees who wish to remain anonymous should utilize the Familylinks Compliance Line. All reported violations will be promptly investigated, by either the Compliance and/or Human Resources departments. If misconduct is identified, corrective action and prevention of reoccurrence will be implemented.

Non-Retaliation

In accordance with applicable law and Human Resources policies, any employee, board member, intern, or volunteer who in good faith reports a violation or suspected violation will NOT be subjected to harassment, adverse employment consequences, or retaliation in any form. An employee who retaliates against another employee is subject to discipline up to and including termination. This is intended to foster a culture of open communication to address serious concerns. For more information please review Human Resources' *Whistleblower Law Policy (HR 100.29)*.



Compliance with Agency Policies

Familylinks seeks to establish clear policies, procedures, and practices for employees. All employees are required to exemplify the highest standards of professional behavior and follow agency policies. These policies include, but are not limited to, the following:

- Engaging in professional and ethical conduct according to the *Work Conduct Policy*
- Avoiding excessive absenteeism or tardiness according to the *Work Conduct Policy*
- Dressing appropriately during the workday according to the *Work Conduct Policy*
- Following instructions from supervisors/managers according to the *Work Conduct Policy*
- Only transporting clients to approved locations according to the *Transportation Policy*
- Reporting any arrests or convictions for any offense and any suspension of driving privileges according to the *Work Conduct Policy*
- Using agency property appropriately and according to the *Property and Equipment Policy*
- Not possessing weapons, alcohol, illegal drugs, or other prohibited items at work according to the *Drug-Free Workplace Policy and Work Conduct Policy*

For more information, please review the associated policies which can be found on Familylinks' SharePoint (<http://intranet.familylinks.org/Docs>).

Compliance with Laws and Regulations

All Familylinks' employees are responsible for following all applicable laws, regulations, and licensing body requirements. If you have questions about which laws and regulations are applicable to your role, please discuss with your supervisor or contact the Compliance Officer. Some of these include, but are not limited to, the following:

Child Protective Services Law

Familylinks' employees are required to report suspected abuse and/or neglect to ChildLine via phone (1-800-932-0313) or the online portal ([CWIS](#)).

Health Information Portability and Accountability Act (HIPAA)

Familylinks complies with all aspects of HIPAA, more information can be found in the section on “Confidentiality” and the *HIPAA Compliance Policy (HR 500-03)*.

Government Investigations

Familylinks cooperates with all government investigations. Employees should contact the Compliance Officer if a person presents themselves as a government investigator. Employees should not provide any information or submit to questioning unless directed to do so.

Subpoenas and Court Orders

It is the policy of Familylinks to maintain compliance with any lawful subpoena or court order. If an employee receives a subpoena or court order, they should immediately bring it to their supervisor for review. The employee or their supervisor must also notify the compliance department via email or telephone immediately upon receipt. For more information please review *Compliance’s Legal Documentation-Subpoena Policy (Compliance 100-05)*.

Confidentiality

Familylinks requires that all employees use care in handling protected health information (PHI), personally identifiable information (PII), or confidential information. This information can be electronic, written, and/or verbal. Some steps to protect clients’ confidential include the following:

- Employees are only permitted to access information that will fulfill their job responsibilities.
- Employees shall not provide access to PHI, PII, or confidential information unless authorized to do so.
- Employees will ensure their computer monitors and printers are not visible to the public or other team members.
- Employees are responsible for logging off the computer system to prevent access by unauthorized users.
- Employees should not leave PHI, PII, or confidential information in their office in a location visible to other team members or the public.
- Employees will store PHI, PII, or confidential information in a private, inaccessible, preferably locked location when not in use, both in the office and in the home.
- In the community, employees should only carry the PHI, PII, or confidential information necessary to complete their job duties. Information in paper form should only be transported in HIPAA compliant containers and stored in your vehicle in a non-visible location (preferable a trunk) for as limited amount of time as possible. It is always preferred that the information be kept on your person.
- Employees will place all PHI, PII, or confidential information to be destroyed in a designated shredding bin.
- Employees will use their professional judgement and take all reasonable steps to protect PHI, PII, and confidential information, as all possible scenarios cannot be outlined.

For more information, please review the *Confidentiality Policy* and the *HIPAA Compliance Policy (HR 500.03)*.

Preventing Fraud, Waste, and Abuse

Familylinks’ employees must ensure that their work is accurate and reflective of the service(s) provided. Submission of bills or claims for payment that may be deemed false, fraudulent, or inaccurate will not be tolerated. Fraud, waste, and abuse can result in disciplinary action up to and including termination. They are defined as the following:

Fraud

- Intentionally submitting false information to get money or a benefit

Waste

- Includes practices that, directly or indirectly, result in unnecessary costs, such as overusing services

Abuse

- Includes actions that may, directly or indirectly, result in unnecessary costs

Some specific examples of fraud, waste, and abuse include the following:

- Billing for services not rendered
- Misrepresenting or falsifying documentation of the services provide
- Service does not meet the requirements for the service code
- Forgery of recipient signatures
- Falsifying or misrepresenting credentials

For more information, please review the *Fraud, Waste, and Abuse Policy (HR 100-38)*.

Diversity & Inclusion

Familylinks is committed to fostering, cultivating, and preserving a culture of diversity and inclusion. This is shown in our practices with clients, internally among employees, and with vendors. An overview of expectations related to diversity and inclusion include the following:

- Treating others with dignity and respect always
- Respectful communication and cooperation between employees
- Teamwork and employee participation, permitting the representation of all groups and perspectives
- Respect for diversity and promoting an inclusive environment

All employees have a responsibility to treat others with dignity and respect. Any employee found to have exhibited conduct not in line with this policy are subject to disciplinary action up to and including termination. For more information, please review the *Diversity and Inclusion Policy (HR 100-37)*.

Any employees who feel they have been subject to behavior that is not in line with policy should seek assistance from the Director of Human Resources.