



Code of Conduct

Mission Statement: Our mission is to provide affordable and accessible outpatient behavioral health care and prevention services for children, teens, and adults.

Intent: Family & Children's Counseling Service's (FCCS) Code of Conduct (the Code) applies to all staff, board members, and independent contractors.

The Code of Conduct is approved by the agency's Board of Directors and is a formal statement of the Agency's commitment to the standards and rules of ethical conduct. FCCS is committed to detecting and preventing unethical or unlawful behavior, stopping such behavior as soon as possible after discovery, and to discipline staff who violate the Code, including those who neglect to report a violation.

All staff must comply with this Code, immediately report any alleged violations of wrongdoing, and assist management and compliance personnel in investigating allegations of wrongdoing.

While these standards addressed in the Code of Conduct are intended to guide staff in the course of their day-to-day responsibilities, they do not replace any Agency or program policies and procedures. There may be instances not addressed by the Code of Conduct or existing policies and procedures, or activities that may conflict with these standards. Staff is advised to seek direction from their supervisor, other management staff or the Compliance Officer in these instances.

Ethics: FCCS follows all laws and regulations applicable to its business and to conduct business with the highest degree of integrity. To accomplish this, all staff and contractors must obey laws and regulations that govern their work and always act in the best interest of the people we serve, their families and the Agency.

Guidelines for staff and contractors

- Staff is expected to keep management staff informed of their activities; to document or record all services or transactions accurately; and to be honest and forthcoming with the Agency, regulatory agencies, and internal and external auditors.
- Staff is expected to comply with the Agency's policies and procedures, accounting rules, and internal controls.
- Staff is expected to function with honesty and integrity in their work for the Agency and with people we serve, providers, suppliers and all others with whom the Agency does business.



Conflict of Interest: Staff and contractors must not allow any outside financial interest, or competing personal interest to influence their decisions or actions taken on behalf of the Agency.

Staff and contractors must avoid any situation where a conflict of interest exists or might appear to exist between their personal interests and those of the Agency. The appearance of a conflict of interest can be as serious and consequential as an actual conflict of interest.

Guidelines for Staff and Contractors

It is a conflict of interest for staff to personally take for themselves opportunities that are discovered through the use of Agency property, information or position with the Agency; to use Agency property or information for personal gain; or to compete with the Agency.

There are many types of situations where potential conflicts may arise. Staff must promptly report any actual or potential conflicts of interest to their immediate supervisor or directly to the Compliance Officer.

Outside Activities and Employment

- Staff may not conduct outside activities during work time. Such activities interfere with regular duties and negatively affects the quality of staff work.
- Staff is a representative of the Agency and must represent FCCS positively in the community, to the Agency or its consumers. Staff may not compete against FCCS, work for its competitors, or have any ownership interest in a competitor.
- Outside employment must not conflict in any way with staff responsibilities

Use of Agency Funds and Resources

- Agency assets are to be used only for the benefit of the Agency and the people we serve. Assets include funds, equipment, inventory, and office supplies, but also concepts, business plans and strategies, information about people served, financial information, computer property rights, and other business information about the Agency.
- Staff may not use Agency assets for personal gain or provide them to any other persons or entities, except in the ordinary course of business as part of an approved transaction.



Confidentiality

During staff employment, staff acquire confidential information about the agency, its staff and people we serve that is to be handled in strict confidence and not discussed with outsiders. The protection of confidential business, staff and client information is very important. Access to confidential client information is limited to the minimum information necessary to carry out staff job responsibilities. Non-compliance is grounds for disciplinary action, and may range from a warning to suspension or discharge (termination), depending upon the nature of the incident and the relevant circumstances.

Business Dealings between the Agency and Staff

- FCCS will not be inappropriately influenced with goods or services from any business in which staff or staff immediate family members have or appear to have a substantial interest.
- Property and resources of the Agency are only to be used for the benefit of the Agency or the people we serve.

Maintenance of Records: Staff and contractors shall record and report all agency, consumer and financial information fully, accurately, and honestly. Records include, but are not limited to, records of the people we serve, documentation of services, accounting books or records, financial statements, timesheets or records, expense reports, vouchers, bills, payroll, claims payment records, correspondence, and any other method of communication. Staff or contractors may not omit or conceal any relevant information.

Guidelines for Staff and Contractors

Many Agency forms are legal documents that demonstrate/document a service was provided; to bill for a service to a consumer; to record a job task; or to record specific events. Staff is expected to document accurately and honestly and only for services they provided or events, they were involved in.

Falsification of Records

- Staff is not to make any false entries in the Agency's records or in any public record for any reason.
- Staff may not alter any permanent entries in the Agency's records.
- Staff may only approve payments or receipts on behalf of the Agency that are described in documents supporting the transaction. "Slush funds" or similar "off the books"



accounts, for which there is no accounting for receipts or expenditures are strictly prohibited.

- Staff may not create or participate in the creation of any records that are intended to mislead or to conceal anything that is improper or unethical.

Expense Records

- Staff is expected to charge expenses accurately and to the appropriate cost center or account, regardless of the financial status of the program, project, or contract, or the budget status of a particular account or line item.

Retention of Records

- The retention, disposal, or destruction of records of or pertaining to the Agency must comply with legal and regulatory requirements and Agency policy.
- Staff will not destroy records pertaining to litigation or government investigations or audits without express written approval of the Compliance Officer.

Protection of Confidential Information: Agency policies and procedures assure confidentiality of information about the people we serve and the Agency and is protected and released only with appropriate authorization, and/or for lawful reasons, in addition to purposes of treatment, payment, and operations. All staff and contractors are required to comply with the Agency's Privacy Policy. Agency policy limits access and use of confidential information to authorized staff required to access the minimum necessary information in order to perform their job responsibilities. Questions concerning confidential information or the Privacy Policy should be referred to an immediate supervisor or the Privacy Officer.

Guidelines for Staff and Contractors

Staff is expected to treat all Agency records/ information as confidential.

Staff may not release confidential information without proper authorization. Confidential information includes information about the people we serve and their families; non-public information about the Agency that may be of use to the Agency's competitors or harmful to the Agency or its customers if released.

Staff must protect Agency information and avoid discussing or disclosing Agency information, purposefully or inadvertently (through casual conversation), to any unauthorized person inside or outside the Agency. Furthermore, staff may not share confidential Agency information except where required for legitimate business purposes.



Agency information may not be removed from Agency property without permission from a supervisor or administrator with proper authority over the information. Consult a supervisor for more information or clarification.

Termination of Employment

- Staff is not to use any confidential information gained from employment with the Agency for their personal or another company or business's benefit. Staff may not remove copies of reports, documents, or other property of the Agency.
- Upon termination of employment with the Agency, staff are to return all Agency property including, but not limited to, Agency documents, notes, and other records containing confidential information; computers, cell phones, tablets, hardware or software; Agency ID; keys, entry fobs and/or credit cards.
- Staff is prohibited from soliciting clients of the Agency, directly or indirectly for the purpose of rendering services in the two (2) years immediately following termination of employment.

Information Security

- Staff is responsible for the proper use and safeguarding of information stored and produced by Agency computer systems.
- Computers, Internet access, email, or other office communications systems are intended for business-related purposes only and not for uses that may be disruptive, offensive, harassing, or harmful to others or the computer systems.
- Staff is not to share personal user names or passwords with anyone else or allow another to access the computer using their credentials (user name & password.).
- Questions concerning information security should be directed to an immediate supervisor or the Security Officer.

Fair Dealing: Conducting business with providers, contractors, suppliers, people we serve, and competitors may pose ethical problems. Staff and contractors are expected to deal fairly and honestly with all providers, contractors, people we serve, and our competitors.

The Code of Conduct and the following guidelines are intended to assist staff in making appropriate, responsible and correct decisions in these and all matters:

Kickbacks and Rebate

- Kickbacks and rebates in cash, credit, or other forms are prohibited. They are unethical, and may be illegal.

Gifts and Gratuities and Entertainment



- Staff may not solicit money, gifts, gratuities, or any other personal benefit or favors of any kind from providers, contractors, producers, accounts, or people we serve and their families.
- Staff must not offer or accept entertainment that is not a reasonable addition to a business relationship but is primarily intended to gain favor or to influence a business decision.

Agreements with Contractors and Vendors

The Agency must ensure that any agreements with contractors and vendors clearly and accurately describe the services to be performed or items to be purchased. Performance standards, and the applicable compensation, if any, must be reasonable in amount, not excessive in terms of industry practice and must equal the value of the services rendered.

Improper Use of Funds or Assets

Use of the Agency's funds or assets for any improper purpose is strictly prohibited. Staff aware of, or with reason to believe funds or assets are being improperly used, must report this immediately to a supervisor or the Compliance Officer.

Federal and State Programs: FCCS is committed to complying with laws and regulations that govern the federal and state programs it administers. Policies and procedures, the Compliance Program, and this Code of Conduct serve to provide guidance in day-to-day work. Staff must abide by the policies and procedures and standards established by the Agency.

Governmental Investigations

On occasions when the Agency is asked to cooperate with an investigation by a federal or state governmental agency, or respond to a request for information the request should be formally addressed to the Agency or an individual within the Agency. Staff and contractors must report any requests for information or cooperation with an investigation to the Executive Director and Compliance Officer immediately.

Political Activities and Contributions

FCCS is a non-profit organization and therefore is prohibited from engaging in any political campaign activities or lobbying other than educating elected representatives or their staff

Guidelines for Staff and Contractors

Agency funds and resources, including staff work time, may not be used for soliciting or promoting political contributions or activities.

Staff may not act as a representative of the Agency in any political campaign activity. In expressing personal political views or support or opposition of a candidate for public office,



staff must clearly identify they are expressing their personal views and opinions, support, or opposition as an individual and *not* as a representative of the Agency.

Laws and regulations prohibit a “substantial” amount of lobbying. There are allowances for the Agency to advocate its position on public issues. To assure that the Agency does not violate any laws or regulations, or risk losing tax-exempt status, staff must seek prior approval from the Executive Director before engaging in any lobbying activities. The Executive Director may consult with legal counsel and needs to record time spent engaged in lobbying activities.

Employment Environment: FCCS is committed to creating a safe and professional workplace where staff and others are treated with respect without regard to their race, sex, age, religion, national origin, color, marital status, disability, or other protected characteristics. Business integrity, teamwork, trust, respect and quality are the Agency’s most important values. Unlawful discrimination or harassment of any kind violates these values. All Agency staff must exhibit and promote respect, integrity, trust, and teamwork in the workplace and comply with this policy in prohibiting and preventing discrimination and harassment in all aspects of Agency operations.

Guidelines for Staff and Contractors

Staff is expected to support the Agency’s commitment to a safe and professional work environment and to demonstrate appropriate behavior in the workplace.

Staff is prohibited from joking or making derogatory remarks about another employee’s race, gender, age, religion, national origin, color, marital status, disability, or other protected characteristics.

Staff are prohibited from considering someone’s race, color, religion, gender, national origin, age, disability, or other protected characteristic in making decisions about hiring, placement, assignment of duties, training, promotion, termination, compensation, benefits or other work related items.

Sexual harassment is prohibited. Sexual harassment includes any form of unwelcome sexual advance, request for sexual favors, or other verbal or physical conduct of a sexual or sex-based nature.

Staff is responsible for understanding the Agency’s policy prohibiting discrimination and sexual harassment. Staff should consult with an appropriate supervisor or administrator if they have questions about rights to a workplace free from unlawful harassment or discrimination or questions about staff duty to avoid discrimination or reporting.



Seeking Guidance and Reporting Violations: Staff and contractors must report any actual or suspected violations of this Code of Conduct, any applicable law or regulation, or any Agency policy and procedure to their immediate supervisor or the Compliance Officer. A Compliance Complaint Box and telephone reporting line are available for confidential or anonymous reporting of issues. Compliance Complaint Boxes are located in the main location's kitchenettes. The Report Line phone number is **1-844-299-1089**

When an actual or suspected violation of this Code of Conduct, applicable law or regulation, or any Agency policy and procedure is reported to an Agency employee, it must be promptly referred to the Compliance Officer. All efforts will be made to protect confidentiality and anonymity of the reporter. The Agency does not tolerate any form of retaliation against anyone who makes a good-faith report in accordance with this Code of Conduct and federal law.

All staff and contractors must cooperate fully and honestly in any investigation into a reported violation of this Code of Conduct, any applicable law or regulation, or Agency policy, procedure, or practice.

Corrective Action and/or Discipline: Any employee or contractor who violates or knowingly fails to report any violation of this Code of Conduct, any applicable law or regulation, or Agency policy, procedure, or practice is subject to disciplinary action, up to and including termination. Disciplinary action may include a warning, either verbal or written, suspension or discharge, depending upon the nature of the incident and the relevant circumstances.

Staff Responsibilities: Attend required training; read and understand FCCS' Compliance Plan, Compliance Policies and Procedures, and Code of Conduct.

Follow the Agency's Code of Conduct and abide by all policies and procedures, guidelines, and Federal, State and not for profit laws and regulations.

Be alert to any situation that could violate the Agency's Code of Conduct, policies and procedures, guidelines, and/or federal, state and not for profit laws and regulations. Promptly report any issues, concerns, violations or suspected violations to supervisors, other management staff, Compliance Officer, or the Executive Director.