

REGIONAL NETWORK of PROGRAMS, Inc.



CODE of CONDUCT

Regional Network of Programs is a not-for-profit human service organization in the Greater Bridgeport area. Its primary mission is to serve the economically disadvantaged/afflicted person by using a variety of individualized and diversified approaches to client care. Such services include treatment and prevention for substance abusers and community living for the mentally ill.

CODE OF CONDUCT

Regional Network of Programs, Inc. (RNP) requires that all full and part-time employees, contractors, students, volunteers (collectively referred to as “staff”), as well as, members of its governing authority (the Board of Directors) shall perform their designated functions in a manner that reflects the highest standards of ethical behavior.

The **Staff Code of Ethics** and its six **Principles** are the Organization’s policy and procedures which shape the culture and norms of RNP’s administrative operations and clinical practices. In addition to these specific organizational guidelines, RNP’s professional staff members are expected to follow the ethical standards required by their specific licensing and certification boards.

The Code of Conduct presented in the following pages illustrates how all RNP actions will reflect a competent, respectful, and professional approach when serving our clients and their families, working with other providers of services, and interacting within the communities we serve. It is expected that staff and members of the Board will perform their duties in compliance with all federal, state, and local regulations and in accordance with guidelines set forth in policy and procedure. Violation of the Staff Code of Ethics and its Principles can lead to disciplinary actions, including termination of employment

POLICY:

STAFF CODE OF ETHICS

The primary obligation of all staff of the Organization is to ensure quality services to clients. It is essential that staff be guided by professional responsibility. This Code of Ethics, therefore, establishes standards by which these responsibilities can be met.

PROCEDURES:

PRINCIPLE I...BEHAVIOR TOWARDS CLIENTS

- 1) Staff shall maintain all client information in the strictest of confidence in order to protect the basic rights of the client and to conform to applicable federal, state and local laws.
- 2) Staff shall be familiar with any applicable client bill of rights and shall, at all times, respect these rights.
- 3) No client shall be discriminated against on the basis of race, creed, religion, sex, national origin, effectual/sexual preference, age, disability, political affiliation, previous criminal record, economic/marital status or for any other reason prohibited by State or Federal Law.
- 4) A staff member shall recognize that the interests of the clients may be served better by a referral to another organization or professional.
- 5) Staff are expected to maintain a high level of professional relationships at all times. Inappropriate personal relationships/conflicts of interest with clients will be grounds for dismissal.

PRINCIPLE II...STAFF INTERACTION

- 1) Staff shall be supportive of the Organization as a whole.
- 2) Interpersonal relationships among staff should always be conducted on a professional level.
- 3) Staff shall utilize the Organization's established procedures when there is a difference or disagreement with another staff member or when an ethical question arises regarding another staff member.
- 4) It is the obligation of staff to take responsible action with regard to any unethical behavior on the part of another employee by reporting his/her concern to the immediate supervisor.
- 5) If the unethical behavior is on the part of one's immediate supervisor, the matter should be taken to the Chief Executive Officer.
- 6) If the unethical behavior is on the part of the Chief Executive Officer, the employee should bring his/her concern directly to the President of the Board of Directors.

PRINCIPLE III...RESPONSIBILITY TO EMPLOYER

- 1) All staff shall support the goals and philosophy of the Organization and follow its policies and procedures.
- 2) It is the obligation of staff to take responsible action with regard to any unethical practices of the Organization as outlined in the text of the Staff Code of Ethics. Staff may refer to such organizations as the Department of Labor, Commission on Human Rights and Equal Opportunities, National Labor Relations Board, or one's attorney.
- 3) The Organization acknowledges the health hazards of smoking and therefore shall designate specific smoking areas.

PRINCIPLE IV.BEHAVIOR TOWARDS OTHER ORGANIZATIONS

- 1) Staff shall support the work and respect the integrity of other organizations.

PRINCIPLE V...PERSONAL RESPONSIBILITY

- 1) Staff shall be expected to realistically assess their own personal strengths, limitations, biases and effectiveness. In addition, they shall remain open to constructive criticism.
- 2) Staff shall be responsible for continued growth through further education and training.
- 3) Staff have the obligation to be appropriate role models for clients and other staff and shall refrain from behavior which reflects badly upon themselves and the Organization.

PRINCIPLE VI...CORPORATE COMPLIANCE

- 1) The Organization is committed to the establishment, implementation and maintenance of a Corporate Compliance Program that emphasizes
 - (a) prevention of wrongdoing – whether intentional or unintentional,
 - (b) immediate reporting and investigation of questionable activities and practices, and
 - (c) best effort to timely correct any situation which puts the Organization, its leadership or staff, funding sources or consumers at risk

The Organization will not retaliate, or tolerate retaliation of any kind against employees who report or who are assigned to investigate such activities and/or practices.

- 2) The process for filing a complaint should be in accordance with *XVI. Grievances* of the Personnel Policies

Professional Conduct

Staff will respect the rights of persons served by RNP including the right to make autonomous decisions and fully participate in every aspect of the service delivery process.

RNP employees will provide services in a manner that fully respects the confidentiality of clients, by demonstrating a functional knowledge of confidentiality policies and guidelines.

RNP employees will be fair and honest in their work, as well as faithful to their contractual obligations and their word. They will not exploit or mislead, nor engage in physical or verbal abuse.

To prevent and avoid unethical conduct, RNP employees will consult with, refer to, and cooperate with other professionals. RNP employees will clarify their professional roles and obligations and be accountable for upholding professional standards of practice.

Personal/Professional Relations

All prior personal relationships between staff and persons entering any of the RNP programs shall be disclosed by the staff member and subject to review by the appropriate supervisor.

Staff will limit relationships with persons served to their defined professional roles and they will not establish ongoing personal or business relationships with clients receiving services.

Staff will conduct themselves in a professional, ethical, and moral manner.

Sexual relationships between staff and persons served are never appropriate. Sexual relationships include, but are not limited to, the following: engaging in any type of sexual activity, flirting, advances and/or propositions of a sexual nature, comments of a sexual nature about an individual's body, clothing, or lewd sexually suggestive comments.

Staff will not accept gifts of value from a client, family member, vendor or stakeholder, and may not accept personal favors or benefits that could reasonably be construed as influencing their conduct.

Business Practices

RNP will utilize the Corporate Compliance Officer to ensure that it conducts business in an ethical manner and that any business practices that are questionable shall be thoroughly investigated. All financial, purchasing, personnel, facility development and information technology practices shall comply with local, state, and federal law and guidelines. All employees shall adhere to RNP's Personnel Policies.

Marketing Practices

RNP will conduct marketing practices in an honest and factual manner so as not to mislead the public or misrepresent RNP's abilities to provide services. It will not claim any service outcomes unless represented by valid and reliable outcome data and/or research studies, nor will it offer monetary rewards or gifts to entice potential service users to enter its programs.

RNP will utilize clear and consistent methods of communicating information to clients, family members, third-party entities, referral sources, funding sources, and community members. The Organization will exhibit an understanding of cultural diversity and a sensitivity to the educational and reading levels of all persons when distributing information.

Clinical Practices

Staff will adhere to all professional codes of conduct and ethical standards for his/her specified professional discipline. As part of new employee orientation, staff will read the organization's Staff Code of Ethics and the Code of Conduct and demonstrate knowledge of these guidelines.

Potential Conflicts of Interest

RNP shall not hire or place in an employee/employer relationship any person who is an active participant in RNP programs.

Any programming that involves a work task, and remuneration for the task, will be therapeutic in nature and will be documented as such by programming guidelines based on theoretical constructs.

RNP employees will not engage in outside professional behavioral health services that are incompatible or in conflict with job duties within the organization. Nor, will they recruit clients for their private practice within their professional roles as RNP staff members. Private practice must be done on a staff member's own time and outside the Organization, as long as such activities are not adverse to the interests and goals of RNP.

If an employee leaves RNP and enters private practice, the consumer may choose to continue his/her therapy with the former employee. However, the therapy must be offered at the same cost with equal accessibility to therapy.

Quality of Care

RNP will provide quality behavioral health care in a manner that is appropriate, determined to be necessary, efficient, effective and culturally relevant to persons served. Staff will follow current ethical standards regarding communication with clients and their representatives regarding services provided.

RNP will inform clients about alternatives and risks associated with the care they are seeking and obtain informed consent prior to any clinical interventions. RNP recognizes the right of clients to make choices about their own care, including the right to do without recommended care or to refuse care.

Necessity of Care

RNP shall submit claims for payment to governmental, private, or individual payers for those services or items that are clinically necessary and appropriate.

When providing services, RNP employees shall only provide those services that are consistent with generally accepted standards for treatment and are determined to be clinically necessary and appropriate.

Service providers may determine that services are clinically necessary or appropriate; however, the clients funding source may not cover or approve those services. In such a case, the person served may request the submission

of a claim for the services to protect his/her rights with respect to those services or to determine the extent of coverage provided by the payer.

Coding and documentation will be consistent with the standards and practices defined by the organization in its policy, procedures, and guidelines.

Coding, Billing, and Accounting

RNP 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.

All services shall be accurately and completely coded and submitted to the appropriate payer in accordance with applicable regulations, laws, contracts, and organizational policies and procedures. Federal and state regulations take precedence, and organizational policies and procedures must reflect those regulations.

Billing and collections will be recorded in the appropriated accounts. An accurate and timely billing structure and medical records system will ensure that RNP effectively implements and complies with required policies and procedures.

Cost Reports

RNP will ensure that all preparation and cost reports submitted to governmental and private organizations are properly prepared and documented according to all applicable federal and state laws.

All cost reports will be submitted and prepared with all costs properly classified, allocated to the correct cost centers, and supported by verifiable and auditable cost data.

All cost report preparation or submission errors and mistakes will be corrected in a timely manner and, if necessary, RNP will clarify procedures and educate employees to prevent or minimize recurrence of those errors.

Personal and Confidential Information

RNP will protect personal and confidential information concerning the organization's system, employees, and persons served. RNP employees shall not disclose confidential consumer information unless at the consumer's request and/or when authorized by law. Clients can request in writing and are entitled to receive copies or summaries of their records.

Confidential information will only be discussed with or disclosed to persons and entities outside the organization through the request of the consumer. Persons outside the organization include the family, business, or social acquaintances of the consumer.

RNP personnel will be familiar with all organizational policy and procedures regarding confidentiality. Employees will keep passwords and other personal security codes confidential.

Creation and Retention of Client Files and Organization Documents

Files and documents and all e-mail activity are the property of RNP. Personnel responsible for the preparation and retention of files and documents shall ensure that these paper and electronic records are accurately prepared and maintained in a manner and location as prescribed by law and RNP policy and procedures.

Employees will not knowingly create or store any record (file or document) that contains any false, fraudulent, fictitious, deceptive, or misleading information nor shall they destroy or remove any record from RNP premises without their supervisor's permission. Files and documents which pertain to on-going legal matters shall be retained.

Employees will not delete any entry from a record. Records can be amended and material added to ensure the accuracy of a record in accordance with policy and procedures. If a record is amended, it must indicate that the notation is an addition or correction and record the actual date that the additional entry was made. Employees will not sign someone else's signature or initials on a record.

The Organization will maintain record retention and record destruction policies and procedures consistent with federal and state requirements

regarding the appropriate time periods for maintenance and location of records. Premature destruction of records could be misinterpreted as an effort to destroy evidence or hide information.

Government Investigation

RNP employees shall cooperate fully with appropriately authorized governmental investigations and audits. They will respond to requests for information in an orderly fashion through employee interviews and documentation review thus enabling the Organization to protect both its own and client interests, while cooperating fully with the investigation.

When a representative from a federal or state agency contacts a RNP employee at home or at their office for information regarding the Organization or any other entity with which the organization does business, the staff person will contact the CEO immediately. If the CEO is not available, the individual will contact the Assistant CEO's of Operations or Finance.

RNP employees will ask to see the government representative's identification and business card, if the government representative presents in person. Otherwise, the employee shall ask for the person's name, office, address, phone number, and identification number and then contact the person's office to confirm his/her identity.

The CEO shall fully apprise the Board of Directors concerning the form and substance of each governmental investigation and audit.

Prevention of Improper Referrals or Payments

RNP employees will not offer or accept, for themselves or for the Organization, anything of value in exchange or as an inducement for referrals of business or the referral of clients.

Federal law prohibits anyone from offering anything of value to a Medicare or Medicaid consumer that is likely to influence that person's decision to select or receive care from a particular behavioral health care provider.

The organization shall establish procedures for the review of all pricing and discounting decisions to ensure that appropriate factors have been considered and that the basis for such arrangements is documented.

Development or initiation of joint ventures, partnerships, and corporations within the Organization must be reviewed and approved by the Board of Directors to ensure compliance with organizational policy and federal regulations.

Antitrust Regulations

RNP will comply with all applicable federal and state antitrust laws.

Employees should not agree or attempt to agree with a competitor to artificially set prices or salaries, divide markets, restrict output, or block new competitors from the market, share pricing information that is not normally available to the public, deny staff privileges to qualified practitioners, or agree to or participate with competitors in a boycott of government programs, insurance companies, or particular drugs or products.

Avoiding Conflicts of Interest

All RNP employees shall conduct clinical and personal business in a manner that avoids potential or actual conflicts of interests. No communications are private and all are subject to review by RNP Board of Directors members or designees.

Employees shall not use their official positions to influence an Organizational decision in which they know, or have reason to know, that they have a financial interest.

Employees must be knowledgeable about activities that may be an actual or potential conflict of interest. Examples of such activities may include, but are not limited to the following:

a. Giving or receiving gifts, gratuities, loans, or other special treatment of value from third parties doing business with or wishing to do business with the organization. Third parties may include, but are not limited to, clients, vendors, suppliers, competitors, payers, carriers, and fiscal intermediaries.

b. Using RNP facilities or resources or equipment for other than organizationally-sanctioned activities. Such activities include the use of communication systems, electronic mail, internet, intranet, phones, voice mail and fax for other than RNP client treatment, administrative and support services. Systems may not be used for viewing, sending or receiving offensive or inappropriate materials.

c. Using RNP's name to promote or sell products or personal services.

d. Contracting for goods or services with family members of the organization directly involved in the purchasing decision.

External Relations

RNP employees shall adhere to fair business practices and accurately and honestly represent themselves and the organization's services.

RNP employees will be honest and truthful in all marketing and advertising practices pertaining to the business practices of the organizations service delivery system.

Vendors who contract to provide goods and services to the organization will be selected on the basis of quality, cost-effectiveness and appropriateness for the identified task or need.

Treatment of Employees

RNP prohibits discrimination in any work related decision on the basis of race, color, national origin, religion, sex, physical or mental disability, ancestry, marital status, age, sexual orientation, citizenship, or status as a covered veteran. The organization is committed to providing equal employment opportunity in a work environment where each employee is treated with fairness, dignity, and respect.

RNP will make reasonable accommodations to the known physical and mental limitations of otherwise qualified individuals with disabilities.

Pursuant to its affirmative action policy, RNP does not tolerate harassment or discrimination by anyone based on the diverse characteristics or cultural

backgrounds of those who work for the Organization. Any form of sexual harassment or workplace violence is prohibited.

Code of Conduct Brochure

All employees, students, volunteers and governing authority members will review the Code of Conduct as part of their initial orientation to RNP. Annually all staff will receive a copy of the Code of Conduct. They will sign a form acknowledging their review and full understanding of the Code, which form shall be retained by the Organization.

Code of Conduct Violations

RNP believes in the importance of ethical practices within the organization. Any employee who reports waste, fraud, abuse or any other questionable practices will not be subject to reprisal by management of the organization. To assure that reprisal is not used, the organization's Board of Directors will serve as advocates for any employee who reports questionable practices. The Corporate Compliance Officer will provide assurance and oversight that there are no adverse actions toward the employee.

The Code of Conduct is shared with persons served and is posted at all owned, leased, or rented RNP program sites and facilities. When any client, family member, authorized representative, advocate or other person believes that an ethical violation has occurred within RNP, he/she may report such suspicion directly to any employee, or management staff or Board member.

If the violation involves a direct and immediate threat to the safety of a patient, staff member, or clinic visitor, employees are obligated to report the alleged violation immediately to their supervisor.

When any employee believes a violation of the Code of Conduct has occurred he/she is obligated to report the violation immediately to his /her supervisor or to the corporate compliance officer if the suspected violation involves their supervisor.

Staff is required to report any suspected violation of the Code of Conduct; however, they are not required to investigate or know for certain that a violation has occurred. Staff must report each suspected violation of the

Code of Conduct separately, should a violation that has been reported occur again.

Once the questionable behavior has been brought to the attention of the supervisor or reported through the corporate compliance procedures, staff reporting the situation will no longer have a responsibility for being involved with the investigation other than providing additional information through a requested interview by the investigator.

When any suspected violation of the Code of Conduct is reported to a supervisor, Board member or the corporate compliance officer, the corporate compliance officer will begin an investigation of the matter immediately. While investigating the complaint, the following issues should be considered and action taken depending on the situation:

- a. Is any client in any harm or potential harm because of this behavior?
- b. Does the complaint require immediate action to remove an RNP employee from contact with a client?
- c. Does the complaint put RNP or its employee in a potentially liable situation that needs legal consultation?

Code of Conduct investigations will follow the guidelines outlined in the RNP Personnel Policies. Theft of equipment, goods or funds, or physical, emotional, and/or sexual abuse of a client or employee will result in termination of employment.

RNP Administrative Office

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