

## **POLICY AND PROCEDURE CODE OF CONDUCT AND ETHICS**

### **POLICY:**

It is the policy of Abbott House, LLC to ensure that all employees' actions reflect a competent, respectful, and professional approach when serving our residents, their families and/or representatives, working with other providers of services, and interacting within the communities we serve. It is expected that all employees' will perform their duties in compliance with all federal, state, and local regulations in accordance with guidelines set forth in this conduct policy. Violation of guidelines within the policy may lead to disciplinary actions, including termination of employment.

### **PURPOSE:**

The purpose of this Code is to provide guidelines for all employees at Abbott House, LLC that will help them achieve our mission in an efficient, effective and ethical manner. We expect all employees to perform their designated functions in a manner that reflects the highest standards of ethical behavior. In addition to the specific guidelines contained in the Code, professionals are expected to follow the ethical standards required by their specific licensing and certification boards.

The ethical standards contained in this Code shape the culture and norms of Abbott House, LLC's administrative operations and clinical practices. All personnel will be held fully accountable to these standards.

### **SEEKING HELP AND INFORMATION:**

If you have any questions about your responsibilities or about Abbott House, LLC's Code, related policies or the law, *ask*. Communication is the key to effective compliance with the guidelines set forth in this Code. Abbott House, LLC has appointed a Corporate Compliance Officer (Abbott House, LLC's Executive Director), whom you also may contact for questions, concerns and/or reporting purposes. We encourage you to contact your supervisor for help first. If your supervisor cannot answer your question or if you do not feel comfortable contacting your supervisor, contact the Corporate Compliance Officer.

Abbott House, LLC has established a Grievance reporting system that is available to all employees. You may remain anonymous and will not be required to reveal your identity using the Grievance process, although providing your identity may assist Abbott House, LLC in addressing your questions or concerns.

### **REPORTING NON-COMPLIANCE:**

Each employee has an obligation to report to management any conduct that he or she believes in good faith to be an ethical or legal violation. If you observe any unethical or unlawful conduct, you are expected to report it to your supervisor, the Corporate Compliance Officer, the Assistant Administrator or through the Grievance reporting process. Your information will be handled discreetly and in accordance with the law and Abbott House, LLC procedures.

### **POLICY AGAINST RETALIATION:**

Abbott House, LLC prohibits any retaliation, direct or indirect, against an employee who, in good faith, seeks help or reports known or suspected violations of our Code or related policies.

### **DISCIPLINARY ACTION AND WAIVERS:**

It is Abbott House, LLC's policy that any employee who violates the Code will be subject to appropriate disciplinary action, up to and including termination of employment. Any supervisor who directs or approves any such violations, who knows of such violations and fails to act promptly to correct them, or who retaliates or tolerates retaliation against any employee who, in good faith, reports a violation, will likewise be subject to disciplinary action, up to and including termination.

Waivers of this Code for employees may be made only by the Executive Director of Abbott House, LLC. Waivers of this Code for the Executive Director may be made only by the Owners of the company.

### **Professional Conduct**

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1. Personnel will respect the rights of our residents by demonstrating full integration of the guidelines contained in the Resident Rights Policy. (see Residents Rights Policy)
2. Abbott House, LLC employees will provide services in a manner that fully respects the confidentiality of residents by demonstrating a functional knowledge of confidentiality policies and guidelines. Employees will receive training through the Relias Learning program annually, as well as through additional in-services as scheduled or as warranted. All business phone interactions will adhere to confidentiality policies as well.
3. All interactions between staff and residents will be held to the highest ethical standards and be free from all forms of abuse and exploitation. All licensed workers will be held to the standards and ethical guidelines outlined by their licensure.

## **Personal and Professional Conduct**

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1. All prior personal relationships between employees and residents entering the organization's programs shall be disclosed by the employee and subject to review by the Executive Director.
2. Personnel will limit relationships with residents exclusively to their defined professional roles. This includes following discharge into the community. All relationships will remain within the scope of the employee's position throughout the duration of employment by Abbott House, LLC.
3. Personnel will never establish personal or fiduciary business relationships with residents. No legal relationship shall be established at any time. Signed documents are only permitted in the scope of employment.
4. Personnel will conduct themselves in a professional, ethical and moral manner.
5. Sexual relationships between employees and residents/friends/family/associates are NOT permitted.
6. Personnel will not accept gifts of value, money or gratuities from residents because it may interfere with therapeutic process. The Executive Director may approve of gifts from family members, however, employees cannot accept personal favors or benefits that may be construed as potentially able to influence their conduct. This also includes gifts of food or use of personal trust money to benefit staff.
7. Personnel will not take, borrow or remove facility or resident property from the premises. This includes, but is not limited to, technology equipment, facility supplies, informational binders, charts of and information about residents. The organization reserves the right to search items brought into or taken out of the facility by employees.
8. Personnel will not solicit residents for funds benefitting any personal causes or fundraising of any kind. For example, Girl Scout cookies, school fundraisers, direct sales and marketing, etc. Employees will not purchase items from residents, unless at a craft sale supported by Abbott House, LLC.
9. **Personnel involved with a resident's care will not serve as a witness for any legal document outside of their employment.**

## **Business Practices**

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1. The Corporate Compliance Officer ensures Abbott House, LLC conducts business in an ethical manner.

2. All business practices shall comply with local, state, and federal law and guidelines.
3. All employees shall adhere to Abbott House, LLC Employee Handbook Policies and Procedures. Resolution may involve reprimand, re-education, suspension or termination.

### **Marketing Practices**

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1. Abbott House, LLC will conduct marketing practices in an honest and factual manner.
2. Abbott House, LLC will utilize clear and consistent methods of communicating information to stakeholders and interested parties. Information will be simple, concise and culturally sensitive.
3. As part of new employee orientation, employees will be trained via Relias Online Training Program and other appropriate methods in a prompt and timely fashion.

### **Potential Conflicts of Interest**

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1. No resident will be hired or placed in an employee/employer relationship with Abbott House, LLC (other than the Certified Recovery Support Specialist CRSS).
2. Any volunteer position that involves a work task and minimal payment, will be therapeutic in nature and documented as part of the individual's treatment plan.
3. Abbott House, LLC employees will not engage in outside professional mental health services that are incompatible or in conflict with job duties within the organization.
4. Employees are expected to meet the responsibilities of the position and be available for work when scheduled or as needed. Outside employment should not interfere with responsibilities or expectations of the position held at Abbott House, LLC.
5. Private practice must be provided on the employee's own time and outside the organization, as long as such activities are not averse to the interests and goals of Abbott House, LLC. This includes non-compete and compliance standards of HIPPA laws.
6. If an employee leaves Abbott House, LLC and enters private practice, a resident may choose to continue therapy with the former employee, as long as it does not conflict with HIPPA laws.
7. An employee shall not engage in other employment or activity on the organization's premises.

8. Only Abbott House, LLC business may be conducted on Abbott House, LLC premises.
9. All employees and professionals will be held to their individual codes of conduct within their specialty.

### **Quality of Care**

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1. Abbott House, LLC will provide quality behavioral health care in a manner that is appropriate, determined to be necessary, efficient, and effective.
2. Health care professionals will follow standards of care regarding communication with residents and their representatives.
3. Abbott House, LLC will inform residents about risks, side effects and other information associated with their care.
4. Abbott House, LLC recognizes the resident's rights to make choices about their own care, including the right to refuse treatment. The only exception may be when it interferes with safety or well-being of self and/or others. These include, but are not limited to the following:
  - a. Medication compliance: the individual will not be forced to take their medication, however, if they refuse medication, and a psychiatric/medical symptom arises that causes danger to self or others, the individual may be hospitalized.
  - b. Individuals are not permitted to have alcohol, drugs or prescription/over the counter medications of any kind on their person or in their rooms. The only medications permitted are approved medications that are prescribed by a physician and stored at the nursing station. The Executive Director or designee has the right to search personal belongings or rooms if there is suspicion of contraband on the premises.
  - c. Abuse of any kind in the form of including but not limited to; fighting, harassment, threats, intimidation or bullying will NOT be tolerated at any time and may result in discharge.

### **Necessity of Care**

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1. Abbott House, LLC will bill solely for room and board services.
2. When providing services, Abbott House, LLC shall only provide services that are consistent with standards of care under the direction and guidance of medical and behavioral health professionals.

3. Abbott House, LLC will advocate for individuals who request services that may not be presently covered by their funding source.

### **Coding, Billing, and Accounting**

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1. Abbott House, LLC Business Office will bill according to State & Federal regulations.
2. Abbott House, LLC will bill solely for services rendered.
3. Business Office will maintain accurate records.

### **Cost Reports**

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1. The preparation cost of reports submitted to governmental & private organizations are prepared by an outside accounting firm and documented according to applicable federal and state laws.
2. All cost report preparation or submission errors will be corrected in a timely manner.

### **Personal and Confidential Information**

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1. Abbott House, LLC will protect confidential information according to state and federal regulations.
2. Abbott House, LLC personnel shall not disclose confidential information unless at the request and/or when authorized by law.
3. Confidential information will only be discussed with or disclosed to persons and entities with appropriate written consent unless mandated by police, emergency or court.
4. Individuals may request and are entitled to receive copies or summaries of their records.
5. The general expectation is that the access to individual records will be granted within 48 hours of the request. If an individual requests copies of records, the facility has a right to have up to 30 days to copy records and may charge a reasonable fee for the copies.

### **Creation and Retention of Residents and Institutional Records:**

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1. Records are the property of the organization and shall not be destroyed or removed from the premises.

2. Employees will not knowingly create misleading or erroneous records.
3. Employees will not delete any entry from a record.
4. Records shall be maintained according to specific organizational policy and procedure.
5. The organization will maintain record retention and record destruction policies and procedures consistent with federal and state regulations.

### **Government Investigation**

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1. Abbott House, LLC employees shall cooperate with authorized government investigations and audits according to applicable law.
2. Abbott House, LLC will respond in an orderly fashion to the government's request for information through employee interviews and documentation review.
3. Individuals from federal or state agencies contacting Abbott House, LLC for any information MUST be referred to the Executive Director.
4. If a government representative presents in person, the employee must contact the Executive Director or designee. It is required that the individual sign the Visitor's Log and show identification.

### **Prevention of Improper Referrals or Payments**

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1. Abbott House, LLC employees will not accept, for themselves or for the organization, anything of value in exchange for referrals of business.
2. Development or initiation of joint ventures, partnerships, and corporations within the organization must be reviewed and approved by the organization's management to ensure compliance with organizational policy and federal regulations.

### **Antitrust Regulations:**

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1. Abbott House, LLC will comply with all applicable federal and state antitrust laws.
2. 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.

### **Avoiding Conflicts of Interest:**

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1. All Abbott House, LLC employees shall conduct clinical and personal business in a manner that avoids potential or actual conflicts of interest.

2. 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.
3. 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, resident, vendors, suppliers, competitors, payers, carriers, and fiscal intermediaries.
  - b. Using Abbott House, LLC or resources for other than organization-sanctioned activities.
  - c. Using the Abbott House, LLC 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 or placing family members in positions with no recourse or consequences for violations of the Code of Ethics or general standards of the position's service provision.

#### **Use of Social Media**

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1. Employees must be aware of the related risks and ethical considerations of social media such as Facebook, Twitter, Pinterest, etc.
  - a. Employees may not post any photos of Abbott House, LLC and must always consider HIPPA privacy and confidentiality of the residents and Abbott House, LLC.
  - b. Social media will be monitored for adherence to its expectations and violations will be dealt with using this policy. Failure to comply is grounds for immediate termination.
  - c. Engagement on social media during work hours is prohibited.

#### **External Relations:**

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1. Abbott House, LLC employees shall adhere to fair business practices and honestly represent themselves and the organization's services.
2. Abbott House, LLC employees will be honest and truthful in all marketing and advertising practices pertaining to the business practices of the organizations service delivery system.
3. 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, in accordance with organization policy.



## **Human Resources**

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1. Abbott House, LLC is committed to providing equal employment opportunity in a work environment where each employee is treated with fairness, dignity, and respect.
2. Abbott House, LLC will make reasonable accommodations to the known physical and mental limitations of otherwise qualified individuals with disabilities.
3. Abbott House, LLC does not tolerate harassment or discrimination by anyone based on the diverse characteristics or cultural backgrounds of those who work for the organization pursuant to the organization's affirmative action policy.
4. Any form of sexual harassment is prohibited. All incidences experienced or observed should be reported immediately to the supervisor or Executive Director. There will be an investigation and resolution and any witness, victim and perpetrator will be asked to provide statements to aid in the investigation. Requests for documentation of sexual harassment resolution will be made to the Executive Director, who will contact proper authorities and may be redacted for confidentiality of victim.
5. Any form of workplace abuse and violence is prohibited. There is a zero-tolerance policy for any form of abuse or violence, from verbal assault (yelling, name-calling, racial/ethnic slurs) to emotional and physical (an unwanted physical contact). Any incidences of violence will be grounds for immediate termination. Any incident of violence is to be reported to the supervisor immediately for investigation and resolution. All resolutions will be signed by the Executive Director and available for parties involved upon request. Proper authorities will be contacted, when appropriate.

## **Corporate Compliance Summary**

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1. All employees, volunteers and governing authority members, as part of the organization's initial orientation, will review the Corporate Compliance and Code of Conduct and Ethics Summary.
2. All personnel will receive a copy of the Corporate Compliance Policy and Procedure. Staff must sign a form acknowledging their review and understanding of the summary at the time of hire to be filed in the employee's personnel file.
3. To assure an awareness of ethical practices, reviews of the Corporate Compliance Policy and Procedure and continued training will be conducted on an annual basis.

### **Procedures for Investigating and Acting on Violations of The Code of Conduct**

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1. In the event an individual believes that an ethical violation has occurred within the operations of the organization, they may report such suspicion directly to the Executive Director in writing, person or by phone. Employees reporting any violation of this ethics code will not experience any adverse consequences for reporting.
2. When an employee believes a violation of the Code has occurred, they are obligated to report the violation to their supervisor or Executive Director.
3. Supervisors who have been informed of a suspected violation or an immediate threat or violation are required to immediately report it to the Executive Director and document all interactions and information regarding the alleged violation.
4. When a reported violation of the Code of Conduct is reported to the Executive Director an investigation will begin immediately. While investigating the complaint, the following issues should be considered, and action taken depending on the situation:
  - a. Employee will be suspended and prohibited from contact with the resident until the investigation is complete.
  - b. If the incident is one of legal liability the Executive Director will consult legal consultation.
  - c. Abbott House, LLC goal: all reported alleged violations be investigated and completed within **five (5) business days**. When other authorities are involved, the investigation will be under the guidance of the agency involved, and five (5) business days is null.

### **General Ethical Guidelines and Considerations**

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1. The Code of Conduct and Ethics Summary is available for review with residents.
2. Violations of the Code of Conduct and Ethics are grounds for termination and may result in immediate termination of employment for the following reasons:
  - Theft of any sort
  - Abuse
  - physical
  - verbal
  - financial
  - emotional
  - intimidation (threats of)
  - sexual abuse of a resident or employee.

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Executive Director

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Date