



CODE OF ETHICS AND PROFESSIONAL CONDUCT

Jewish Social Service Agency
and Premier Homecare



Message from the CEO

A special message from the Chief Executive Officer, Todd Schenk, to the employees, volunteers, consultants, vendors, business associates and the Board of Directors of JSSA and Premier Home Care:

JSSA and Premier Home Care (collectively referred to as “JSSA”) take pride in the service and support we provide to people in need. We take our commitment to deliver services of the highest quality very seriously, and believe this gets done when we all work together towards a common goal. Underlying our work is the desire to improve our community, deliver service excellence, provide compassionate care, preserve client dignity, foster autonomy and independence, and nurture a sense of community where everyone feels they belong.

In order to achieve these lofty aspirations, we promote the highest standards of ethical behavior and professional conduct within our organization supported by strict expectations of integrity, fairness and transparency in our clinical and business practices. For this reason, we have developed this Code of Ethics and Professional Conduct as part of our Compliance Program to reflect the values and professional standards that we expect all associated with JSSA will uphold. This Code and the Compliance Program are intended to guide and direct all employees, officers, board members, volunteers, consultants, vendors and business associates of JSSA in dealing with situations they may encounter.

This Code and the Compliance Program have been designed to guide our work, shape our workplace and define JSSA as an organization deeply committed to ethical business conduct. It is not intended to be a comprehensive guide to all of our policies and procedures or to all of our responsibilities under the state and federal laws that apply to JSSA. Each of us should read the Code carefully and completely, raising any questions to a supervisor, Human Resources and/or the Compliance office. We all have a personal obligation to uphold the standards described in this Code. You have my personal pledge that there will be no retaliation for good faith reporting of actual and/or potential compliance issues. This Code applies equally to everyone associated with the organization. Please read this booklet carefully, paying particular attention to those aspects of the Code which apply to your area of responsibility.

If you do not understand something in the Code of Ethics and Professional Conduct, please reach out to your supervisor or to the Compliance and Continuous Quality Improvement Director for assistance. If you believe there may have been a violation of our Code, you should report the concern to your supervisor, the Human Resource Department, the Compliance and Continuous Quality Improvement Director, or anyone in senior management with whom you are comfortable. Should you decide that your concern needs to be reported to a third party and/or anonymously, we have set up a Compliance and Ethics Hotline for this purpose. This external hotline may be accessed by calling the toll-free number at 1-844-600-0056, through the internet at www.lighthouse-services.com/jssa, by emailing reports@lighthouse-services.com, or by faxing your concern to 1-240-353-6339.

Thank you,



Todd Schenk, M.Ed., MBA
Chief Executive Officer of JSSA

TABLE OF CONTENTS

Letter from the Chief Executive Officer.....	2
Introduction.....	4
Mission, Vision and Values Statements.....	4
I. Colleagues and Culture	5
a. Trust.....	5
b. Respect.....	5
i. Diversity and Inclusion.....	6
ii. Non-Discrimination.....	6
iii. Non-Harassment.....	6
c. Attitude.....	6
d. Ethics.....	7
e. Accountability.....	8
i. Special Responsibilities of Supervisors.....	8
II. Employee-Client Conduct	8
III. Quality of Service	9
a. Interaction with Clients and Family Members.....	9
b. Client Privacy.....	10
c. Maintaining Accurate Records.....	11
IV. Regulatory Compliance.....	12
a. Compliance with Laws, Rules, Regulations, and JSSA Policies and Procedure.....	12
b. Open-Door Policy.....	13
c. Questions and Reporting.....	13
d. Compliance and Ethics Hotline.....	14
e. Non-Retaliation.....	14
f. Conflicts of Interest.....	15
g. Disclosures of Conflicts of Interest.....	16
V. Safety.....	17
VI. Financial Management	17
a. Financial Performance	17
VII. Information Technology and Network Systems	18
Summary of Your Responsibilities under Our Code of Ethics and Professional Conduct.....	19

INTRODUCTION

The Jewish Social Service Agency and Premier Homecare (collectively “JSSA” for purposes of this Code of Ethics and Professional Conduct) are dedicated to excellence in service. JSSA’s commitment is rooted in the Jewish principles of repairing the world, helping others, charity, justice and responsibility to care for one’s neighbor. We serve and support more than 30,000 individuals annually through a wide range of counseling, education, special needs services, hospice and nursing care, in-home support, social services and specialized employment. Accordingly, we have a special obligation to promote an agency culture of the highest ethical standards for our clients, employees, volunteers, consultants, vendors, business associates, and board members (the “JSSA Team”).

The Code of Ethics and Professional Conduct (“Code”) has been developed to meet the dual responsibility we have to the clients we serve and to ourselves. It also helps us understand how to comply with the legal and ethical responsibilities that come with our jobs. Our Code is intended to provide standards that you can use when you face decisions or situations that may affect your professional integrity and the integrity of JSSA. The guidelines set forth ensure compliance with federal and state standards, and at the same time promote integrity, support objectivity and foster trust in the work that we do, each day, for our clients and the community.

Rules and regulations are never, in themselves, sufficient to ensure moral and ethical behavior. Our moral fiber is exemplified through our actions in how we go about our daily business. Acting with integrity and meeting our ethics and compliance requirements are the most important things we do at JSSA. Together, let’s ensure integrity continues to be the foundation for who we are and everything we do.

VISION, MISSION AND VALUES STATEMENTS

Jewish Social Service Agency

Mission: To be the first place for the Jewish community, as well as the community at large, to turn for clinical and social services of the highest quality that sustain and nurture all who seek assistance.

Vision: JSSA strives to be the preeminent coordinator and provider of a broad range of clinical and social services for individuals and families residing in the greater Washington metropolitan area who seek help with life’s many challenges.

Values: JSSA is rooted in the Jewish traditions of *tikkun olam*, commitment to heal and repair the world, and *tzedakah*, charity, justice and responsibility to care for one’s neighbor. In all that it does, JSSA is guided by a set of deep-seated values:

- We strive for Excellence: In everything we do, we have the highest commitment to quality, customer service and employee satisfaction.
- We respect Individuality: We work to understand the needs of each person turning to us for assistance, the needs of their families and caregivers, and the needs of our employees.
- We honor Dignity: In all situations, we honor every client’s, family member’s and employee’s right to

respect and privacy.

- We promote Independence: At all times, we encourage every client's and family's right to personal choice and determination.
- We accept Responsibility: We make our services available to all regardless of their ability to pay.
- We encourage a Sense of Belonging: Through collaboration and cohesive teamwork, we create an atmosphere that is welcoming, inclusive, compassionate and supportive.

Premier Homecare

Mission: To provide client-focused services that support a safe and healthy environment. Our clients will always be treated with respect and dignity, and encouraged to be as independent as possible.

Values: It is our goal to employ competent, caring and well-trained individuals who are responsive to the needs of our clients, their families and the community we serve. Our agency will provide staff with competitive compensation, an inviting work environment, and knowledgeable, trustworthy management and direction.

I. COLLEAGUES AND CULTURE

Everyone at JSSA is treated with fairness, dignity, courtesy and consideration.

The qualities desired at JSSA are aligned with our mission, vision and values; trust, respect, attitude, ethics, and accountability. They reflect the characteristics we stand for and expect of all JSSA team members. These qualities apply to everything we do:

Trust:

Trust has been placed in us, trust to do the right thing. We earn trust by asking questions and getting answers before we act, and by standing together against misconduct. We earn trust by exemplifying JSSA's principles of integrity and responsibility. We earn it by upholding our agency's reputation as a client-dedicated, passionate agency, which conducts business the smart way, and the right way. As we earn trust, we continue to build a bright future for our clients, our communities, our colleagues and our business partners¹.

If something doesn't feel right, doesn't seem right, doesn't look right, or doesn't sound right, we must question it. If this Code does not clearly address a concern, we must seek guidance from other sources.

Respect:

Having an open, trust-based environment is essential to our foundation. We seek to provide a work environment that fosters respect for all clients, employees, volunteers, consultants, vendors, business associates and board members, and reflects the diversity of the communities in which we operate.

¹ The term business partners refers to vendors and business associates.

Diversity and Inclusion:

The diversity and culture of the people we serve and work with enable us to enhance the services we deliver to our clients. We foster a workplace where different cultures and ideas are valued, supported and encouraged.

Non-Discrimination:

We prohibit discrimination in any employment-related or business-related decision. We hire, select, give performance appraisals, and promote based on merit. We do not tolerate discriminating against anyone on the basis of protected characteristics such as race, color, religion, national origin, gender, age, disability, sexual orientation, pregnancy, gender identity/expression, marital status, veteran status, or any other unlawful factor.

If you experience discrimination, or if you become aware of discrimination, you must report it immediately using the reporting methods outlined in our Code.

Non-Harassment:

Respect for one another demands a work environment free from all forms of harassment. Harassment is any form of inappropriate or illegal conduct towards another person that creates an intimidating, hostile, or offensive work environment. It can be sexual or nonsexual in nature. No matter the form it takes, harassment can interfere with a person's work performance or adversely affect his or her employment opportunities. We do not tolerate harassment regardless of whether it occurs on agency premises, off-site or after-hour events such as agency events, trainings, teambuilding events, business conferences, or business travel.

If you experience harassment, or if you become aware of a harassment situation, you must report it immediately using the reporting methods outlined in our Code.

Attitude:

An integral key to any successful organization is having a positive attitude. Our positive attitude towards maintaining high standards for work ethics helps create our productive environment. We take pride in the work, clients, and partners we conduct business with. We value each other's opinions, treat clients with dignity, respect, and recognize cultural diversity. We continually work together to improve communication, solve problems and make decisions efficiently. Teamwork provides us with opportunities to bond with one another professionally and enhances respect for each other. Teamwork also enriches creativity and innovation of any one individual.

Our positive attitude is demonstrated every day through:

- Promoting a work environment that is safe and based on excellence, dignity, and responsibility.

- Inspiring others through a sense of dedication and commitment.
- Encouraging a sense of belonging among everyone.
- Improving our professional knowledge and skills to better serve others.
- Preventing and/or refraining from discrimination or harassment of any kind, including racial, cultural, religious, age, differing abilities, and/or sexual orientation and gender identity.
- Managing JSSA resources in a manner that supports the mission and enhances services.
- Being familiar and complying with legal and regulatory requirements relevant to individual position responsibilities.
- Avoiding using our position for personal gain.
- Ensuring all internal and external communications are professional, accurate and truthful.
- Treating others how we want to be treated.
- Assisting colleagues and sharing knowledge to the betterment of the team.
- Assessing if actions meet JSSA's expected standards.

Ethics:

At JSSA, we are compassionate and committed to conducting business with the highest standards of ethics, integrity, respect and accountability. Our Code sets the standards for how we perform and hold everyone from the top down to the same standards of conduct. However, our Code only guides our ethical conduct. The Code cannot cover every possible situation or every question you may have. Ethics compels us to get an answer before we act if we are uncertain if something is right.

We are also committed to following specific professional codes of ethics, such as the National Association of Social Work (NASW), the American Counseling Association (ACA) and the American Psychological Association (APA). These codes include overarching principles that express our values and standards that guide our Code and assist us with making wise decisions.

On unique occasions, it may be appropriate to reconsider or alter a provision of our Code for a particular situation. This might be the case if doing one thing would be a violation, but doing another thing, or nothing at all, would also be a violation, or where legal requirements changed after the provision was written. If you encounter circumstances where you think such an ethical dilemma or contradiction has arisen, you should follow the reporting methods outlined in our Code.

Accountability

We each have accountability in various areas of our professional lives. We all assume accountability for compliance with our Code and additional areas relating to our specific roles at JSSA. Additionally, we are all charged with ensuring we understand who our clients are, how services are being rendered, and maintaining our focus on JSSA's missions, visions, and values.

Some JSSA team members assume additional accountability as supervisors.

Special Responsibilities of Supervisors

Supervisors have additional duties and responsibilities. Supervisors must show, through their words, decisions, and actions, a personal commitment to the highest standards of integrity. As a supervisor, you are expected to:

- Ensure members on your team understand the Code and agency policies.
- Recognize and reward employees, volunteers and consultants who set positive examples through their actions and behaviors.
- Be alert to and, as necessary, report any potential misconduct that occurs within your team or workplace.
- Create an environment that encourages employees, volunteers and consultants to raise ethics, compliance, and policy questions and concerns.

As a supervisor, it is your duty to set the tone that integrity is top priority at JSSA.

II. EMPLOYEE-CLIENT CONDUCT

We believe professional conduct includes behavior that advances a client's course of treatment or services, and establishes appropriate boundaries in the employee-client relationship. JSSA team members recognize that trust is a cornerstone of the professional relationship. We aspire to earn the trust of clients by creating an ongoing partnership, establishing and upholding appropriate boundaries, and maintaining confidentiality. We communicate the parameters of confidentiality in a culturally competent manner.

Below are some examples of behaviors we exemplify:

- We promote professional conduct that advances client care.
- We maintain professional boundaries with clients.
- We protect the confidentiality of client information.

- We respect the cultural values and religious beliefs of those around us.
- We enforce the requirement of duty to warn.
- We do not offer to, or provide, a client with contraband, and do not “hold” a client’s contraband.
- We may accept an item made by a client during the therapeutic process only if acceptance of the gift is determined to be in the best clinical interests of the client. The employee makes such determination in consultation with his/her supervisor.
- We must not establish relationships that extend outside of the normal client-worker relationship, or include any off-site contact with a client, a former client and a client’s family member via telephone, e-mail, social media, or face-to-face contact, without the knowledge and expressed consent of an employee’s supervisor.
- We do not ask or instruct a client, either explicitly or implicitly, “not to tell” information regarding any incident.
- We maintain confidentiality in accordance with JSSA policy and procedures, and all state and federal laws and regulations. As such, we avoid giving blanket promises to clients about not sharing information a client provides.
- We do not borrow, loan or accept money from a client, a former client, and/or a client’s family member.
- We only have clients, former clients and/or a client’s family members in our homes, or vehicles with prior authorization from our supervisor or delegate.
- We do not give a client, a former client, and/or a client’s family member our personal telephone number, email address and/or social media contact information which may include but not be limited to cellular phone number, home telephone number, Facebook, home or personal e-mail address, and any other telephone numbers, e-messaging, or means of access unrelated to JSSA programs, without the knowledge and expressed consent of your supervisor.

III. QUALITY OF SERVICE

Interaction with Clients and Family Members:

Our clients and their families are our first priority, and we are committed to serving all clients and their family members, with compassion, dignity, and respect. We welcome the involvement of our clients and their loved ones as appropriate in decisions affecting their treatment or service plan. We strive to treat our clients and their families in the same manner that we would desire to be treated.

We meet this commitment through:

- Practicing our profession with integrity, honestly, truthfulness and adherence to the absolute obligation to safeguard community trust.
- Providing access to service, treatment and care to clients, regardless of culture, race, ethnicity, religion, gender identity, age, sexual orientation, and differing abilities.
- Obtaining written consents from our clients to provide services.
- Providing required services that meet the assessed and prioritized needs of clients, as determined by the client and his/her family, working with qualified and competent staff.
- Cooperating and collaborating with other service providers involved with our clients' care.
- Documenting all services provided in a timely and professional manner.
- Beginning service termination or discharge planning early with on-going modifications as service progresses.
- Providing an accessible process for clients to report and resolve grievance.
- Taking all reasonable steps necessary to ensure that those employees retained or hired into positions with clinical responsibilities have appropriate and current credentials.
- Providing professional supervision, consultation and training to maintain and enhance our staff's ability to meet the needs of clients.
- Providing and documenting on-going evaluation and modification of our services.
- Being accountable to government regulatory bodies and the public for the proper use of public funding and to our benefactors for private support.
- Acknowledging when we cannot meet the service needs of a client and making an appropriate and timely referral.

Client Privacy:

In the course of serving our clients and their families, we collect sensitive information about our clients' medical conditions, treatments, family history and/or medications. Much of this information is personal in nature and must be considered highly sensitive. We must maintain the confidentiality of this information at all times.

We comply with all state and federal laws, to include the Health Insurance Portability and Accountability Act of 1996 (HIPAA), as amended, and the Health Information Technology for Economic and Clinical Health Act of 2009 (HITECH), in accessing, using, processing or disclosing protected health information and we are familiar with our Notice of Privacy Practices. We only share protected information when authorized under HIPAA for treatment, payment, or healthcare operations; or as required by law. If you have questions or you need guidance, talk with your supervisor or the Compliance and Continuous Quality Improvement Director.

Protecting our clients' records is of utmost importance. To protect the privacy of all clients and staff, past, present and future, as well as to maintain JSSA security regarding the content of paper and electronic files, we do not reveal or release any confidential information or materials to any unauthorized personnel.

The following are some of our confidentiality responsibilities:

- We respect the privacy of our clients and colleagues at all times. We access and share background information as required by law and on a "need to know" and "minimally necessary" basis only.
- We only reveal medical, clinical and/or business information with appropriate releases and when supported by a legitimate clinical or business purpose, client request, or court order and we are in compliance with applicable laws, rules, regulations, and our policies and procedures.
- We never discuss client identifiable information in any public area, including, but not limited to: elevators, hallways, rest rooms, and lobbies.
- We maintain current and accurate paper and electronic client records in accordance with procedures outlined in all JSSA policies and procedures.
- We store, retain and archive records as required by federal, state and local law.
- We provide clients or their family members access to their records as required by the law.
- We respond to any violations of confidentiality immediately to determine the source of the breach, to repair the damage, to inform those involved, and to sanction those responsible.

Maintaining Accurate Records:

All of us are responsible for ensuring our records are complete and accurate. This helps us live up to our promise of integrity and trust, and allows us to meet our commitments to funders, granters, and regulators. All of our records, including client and financial records, must fairly and accurately reflect the true nature, dates, services, amounts, involved parties, and purpose. You must never make false or artificial entries on any report or record.

We need accurate information to make the best and most effective decisions for our clients and the agency. To fulfill our obligations and to be accountable to our clients, employees, volunteers, consultants, vendors, business associates, and government authorities, we must keep full, fair, accurate, and timely records of all business-related transactions absent of any falsified, misleading or forged documentation.

Complete and accurate business records for which we are responsible include, but are not limited to: time records, financial reports, accounting records, expense reports, check requests, billing records, client records, employee records, and any other business or medical record documents. Records should not be destroyed, or altered to cover up an error or omission, or for the purpose of receiving any payment to which JSSA is not entitled.

We must never sign someone else's name to any JSSA documents.

IV. REGULATORY COMPLIANCE

Compliance with Laws, Rules, Regulations, and JSSA Policies and Procedures:

Compliance with all applicable laws, rules and regulations is fundamental to our operations. JSSA policies and procedures guide our day to day business conduct in an honest, ethical and professional manner within these laws, rules and regulations. We understand and adhere to all of JSSA's policies and procedures. You should feel comfortable asking questions before you act, so you can get clear answers in advance about complying with our Code, our policies and legal requirements.

Here are some examples of how we promote compliance:

- We are truthful and straightforward in our advertising, development and marketing activities.
- We ensure all communications, disclosures of information, and data are clear, accurate, and complete to avoid misleading statements.
- We are responsive to inquiries by government auditors, investigators, or other officials.
- We comply in full with laws that require reporting alleged abuse, neglect and/or maltreatment of any client.
- We comply with all federal, state and local regulations concerning the prescription of medications.
- We do not solicit, receive, give or offer anything of value for the referral of clients or for the purchase of goods and services.
- We prohibit kickbacks, bribes, rebates or any kind of benefits.

- We only engage in business activity that is ethical and legal.

We continually strive to maintain compliance and ethical responsibilities by:

- Investigating all incidents and good faith complaints thoroughly in a confidential, timely manner without retaliation or retribution.
- Employing supervisors who are competent and listen to employee concerns.
- Protecting the confidentiality of information pertaining to employees, such as address, health, finances, etc. Confidential information will not be shared with others unless there is a legitimate business-related reason.
- Seeking JSSA team members who have not been sanctioned by regulatory agencies and who are able to perform their designated responsibilities.
- Offering training opportunities and other learning forums for employees to develop new skills.
- Providing supervision that supports employees as they learn, perform their duties and consider promotional opportunities.

Open-Door Policy:

JSSA promotes an “open-door” environment and encourages direct and honest communication among staff and senior leadership. We strive to maintain a professional environment where you can develop your skills and careers based upon ability, effort and job performance.

Questions and Reporting:

Violations of our Code are serious and can cause great harm to our reputation. If you have a question or a concern, or become aware of conduct you think may be a violation of our Code, policies, or the law, then you have a duty to speak up. Reporting your concern in good faith, meaning you are giving a sincere and complete account of a possible issue, helps us solve problems in the workplace before they escalate.

If you suspect a legal or ethical violation, you are expected to communicate such to your supervisor, either orally or in writing. However, if you are uncomfortable speaking with your supervisor or you are not satisfied with the response, you should contact your supervisor’s supervisor, Human Resources, the Compliance and Continuous Quality Improvement Director, or anyone in senior management whom you feel comfortable approaching. Supervisors are required to report suspected violations to the Compliance and Continuous Quality Improvement Director.

You may also write a letter to the Compliance and Continuous Quality Improvement Director at 200 Wood Hill Road, Rockville, Maryland, 20850, utilizing interoffice mail or regular mail. If the response to your report

is unsatisfactory or you are uncomfortable addressing such concerns to those listed above, you may also contact the Chairman of the JSSA Compliance Committee, Harold Krauthamer, by email at Harold@krauthamerstahl.com or by phone at 240-353-6339. Additionally, if you do not feel comfortable using any of the channels listed, you may use the Compliance and Ethics Hotline; see below.

While you may choose to report anonymously, please know that it may be difficult to follow up with specific details of your concern. We analyze and investigate all reports of misconduct and take appropriate action when violations are found. This may include disciplinary action against those who commit violations, up to and including termination. If asked to aid in an investigation, you are expected to answer all questions truthfully and cooperate completely. Lying, concealing, or covering up an ethical or legal violation is a serious violation of our Code.

Compliance and Ethics Hotline:

The Compliance and Ethics Hotline is available to you if you have a concern and are uncomfortable discussing a matter with your supervisor, Human Resources, the Compliance and Continuous Quality Improvement Director or the Chairman of the JSSA Compliance Committee. The hotline is supported by a third party vendor, Lighthouse Services, and staffed by trained professionals 24 hours a day, 7 days a week.

All requests for information or action will be handled promptly, discreetly and professionally. Accordingly, reports will be assigned a unique File ID with no identifying information unless the reporter chooses to leave information to identify him/herself. Information from hotline reports will be communicated to the Compliance and Continuous Quality Improvement Director for review, investigation, and response. If your report involves misconduct on the part of the Compliance and Continuous Quality Improvement Director, the hotline vendor will automatically divert your concern to the Chairman of the Compliance Committee to investigate. If your report involves the Chief Executive Officer, the Compliance and Continuous Quality Improvement Director will work directly with the Chairman of the JSSA Compliance Committee to investigate.

The Compliance and Ethics Hotline may be accessed by the internet at www.lighthouse-services.com/jssa, by calling the toll-free number at 844-600-0056, by emailing reports@lighthouse-services.com, or by faxing your concern to 215-689-3885.

Non-Retaliation:

Everyone must feel empowered to report any suspected violation of the law, our Code, or internal policies without fear that his/her employment or other business relationship will be negatively impacted. JSSA strictly prohibits any form of retaliation against those who ask questions, voice concerns or submit reports in good faith, as well as those who participate in ethics and compliance investigations and audits.

Good faith does not mean you have to be right, however, it does mean you are providing all of the information you have and you believe to be truthful. Bad faith is when someone provides information he or she knows is false, often with the intent to target or retaliate against someone else. Just as we do not tolerate retaliation, we will not tolerate knowingly false information submitted in bad faith. Anyone at any level who engages in retaliation, discrimination or harassment may be subject to disciplinary action, up to

and including termination.

If you believe you are being retaliated or discriminated against or harassed because you reported a concern, you must promptly report this to your supervisor, Human Resources, or to the Compliance and Continuous Quality Improvement Director.

Conflicts of Interest:

We are all dedicated to making JSSA successful. Conflicts of interest can interfere with this goal. Conflicts of Interest, including matters of independence and personal behavior, are one of the most important codes examined. A “conflict of interest” occurs when a private interest interferes (or appears to interfere) with the interests of JSSA. A potential conflict may arise from the business relationships, financial investments, part-time jobs, or other activities that could influence or appear to influence your ability to act in the best interests of JSSA or that make it difficult to perform your work objectively and effectively.

You can avoid common conflict situations or the appearance of conflict situation by:

- Disclosing any actual or potential conflict regularly and seeking guidance.
- Making timely and good faith disclosures of any direct or indirect benefit related to doing business with JSSA or being affiliated with the agency.
- Discouraging any business arrangements by employees, volunteers, consultants, and board members with clients or close relatives² of clients when a client’s case is active.
- Making timely and good faith disclosures of any direct or indirect interest related to any business associate or vendor which JSSA has or is contemplating a transaction or business relationship.
- Reporting to the Compliance and Continuous Quality Improvement Director information about a close relative who is doing business with JSSA or in any way benefiting from an affiliation with JSSA.
- Not accepting gifts, rewards, bonuses or any item of significant value³ from clients, family members of clients, colleagues, volunteers, consultants, vendors, business associates or board members.⁴

² A close relative means: (1) current or former spouse and parents thereof; (2) sons and daughters, and spouses thereof; (3) parents, and spouses thereof; (4) brothers and sisters, and spouses thereof; (5) grandparents and grandchildren, and spouses thereof; (6) domestic partner and parents thereof, including domestic partners of any individual in (2) through (5) of this definition; and (7) household member.

³ Significant value is defined as an item or gift with a value above \$25.

⁴ For Premier Homecare, refer to Premier Homecare’s Gift Acceptance Policy.

- Not establishing or using funds, money or assets for reciprocal agreements⁵, bribes, kickbacks, personal entertainment or any other improper purpose.
- Avoiding any reciprocal agreements, whether verbal or written, that express or imply an arrangement to enhance services or provide entitlements which could be reasonably perceived as unfair or deceptive.
- Not using confidential information acquired in the course of performing agency related duties for any personal gain or in any manner contrary to law or regulation.
- Not taking an agency client, case or applicant into private practice without prior written approval.
- Not permitting employees to supervise their relatives or work in the same unit as relatives.
- Reporting conflict or the appearance of any conflict of interest annually and updated as needed.
- Recusing oneself in a contract selection process if the vendor or business associate is a personal friend or relative.
- Ensuring vendors or business associates are not administratively accountable to an employee who is a relative.
- Ensuring all employees, volunteers, consultants, vendors, business associates, and board members receive periodic reviews of the Code of Conduct and sign that they have been made aware of it.
- Ensuring JSSA's vendors and business associates are advised of the Code of Conduct annually.

Disclosures of Conflicts of Interest:

We recognize a conflict of interest may develop without any bad intentions and changes in circumstances may arise that create a conflict or the appearance of a conflict of interest where none previously existed.

As soon as you become aware of a possible conflict of interest situation, disclose it to your supervisor. Your supervisor, working with the Compliance and Continuous Quality Improvement Director and/or Human Resources, will determine what must be done to resolve it, or will give you approval to proceed with assurances you will implement proper precautionary actions so a potential conflict of interest will not become an actual one. While a particular conflict of interest situation may not rise to the level of a Code violation, failure to report a conflict may.

⁵ Reciprocal Agreement is an arrangement in which expresses or implies an arrangement to enhance services or provide entitlements which could be reasonably perceived as unfair or deceptive.

V. SAFETY

We strive to provide everyone with a safe and healthy work environment. As such, we are also committed to maintaining a drug-free workplace. That means all of us must be free from the influence of drugs and alcohol while conducting business. The use, possession, distribution, or sale of illegal drugs, or the improper use or abuse of prescription drugs, on agency premises or while on agency business is strictly prohibited.

We are also expected to treat each other with respect and courtesy. JSSA will not tolerate acts or threats of violence. If you witness actual or threatened violence in the workplace, you should report it immediately to your supervisor, Human Resources, or the Compliance and Continuous Quality Improvement Director.

Additionally, we are responsible for:

- Becoming familiar with and following emergency safety plans and procedures in our work sites including facility safety assessments and reports and evacuation and fire drills.
- Reporting and addressing all safety concerns to a supervisor in a timely manner.
- Displaying our JSSA identification card when required while at any agency program or building.
- Ensuring that unauthorized person do not have access to agency sites.
- Ensuring that unauthorized person(s) in possession of any firearm or weapon does not have access to any building, or is not permitted on the grounds of any site at which there is a program operated by JSSA.
- Establishing policies, practices and training within our areas of responsibility to safeguard JSSA assets including property, intellectual property, cars, equipment, materials, products, plans, client and fiscal records and reports, ideas and data.

VI. FINANCIAL MANAGEMENT

Financial management holds an important and elevated role at JSSA. We ensure JSSA's interests are appropriately balanced, protected, and preserved. We are committed to managing our resources in a manner that supports our mission and enhances services.

Financial Performance:

Successful financial performance is the direct result of achieving positive service outcomes and managing our programs in a fiscally responsible manner.

To help ensure ethical conduct in the practice of financial management throughout JSSA, we:

- Submit claims that accurately reflect the dates of service and levels of care of our clients, and comply with all pertinent billing rules and regulations.
- Bill only for services that have been provided and that are fully documented in our clients' records.
- Prepare and maintain all claims, billing records and financial reports accurately, honestly, timely and in accordance with generally accepted accounting principles.
- Use billing codes that accurately describe our services. Improper coding or bundling/unbundling charges to increase reimbursement is strictly prohibited.
- Submit claims only for services that we believe are clinically and medically necessary, or as applicable.
- Promptly report any concerns or errors to our supervisor.
- Promptly correct any identified billing errors, notify payers of improper charges and refund overpayments in accordance with established procedures, rules and regulations.
- Do not waive co-payments and deductibles.
- Do not provide any fiscal benefits to clients in return for their admission or continued treatment or service.
- Offer sliding scale fees only to clients that have documented financial needs.
- Do not tolerate false, fictitious or fraudulent claims.

VII. INFORMATION TECHNOLOGY AND NETWORK SYSTEMS

Social networking and the Internet are key business tools. The use of the Internet and social networks at work or using company technologies must be consistent with our Code and exemplify respect, trust, and accountability. We may not use JSSA information technologies (equipment, software, or networking resources) to gather or distribute offensive, sexually-suggestive, discriminatory, harassing, or other inappropriate data or information, whether during or after work hours.

We use the Newspaper Rule to evaluate whether communication is appropriate. If your communication appeared on the front page of the paper for others to read without any other context, would it be perceived as consistent with our Code? If not, then don't use it, send it, or post it.

To maintain the security, integrity, and the business purposes of our information technologies and comply with laws, regulations, privacy obligations and contractual duties, we all need to take necessary actions to safeguard passwords and identification codes to prevent unauthorized access to JSSA and client information systems.

JSSA reserves the right to monitor the content of any messages transmitted or stored through or in its systems. This includes information that has been deleted by users or sent over JSSA networks. You should not expect privacy (beyond that required by applicable laws) when using e-mail, the Internet, or other forms of electronic communications on JSSA computers or networks. We expect and require each of us to be respectful of the conditions and limitations that apply to use of JSSA resources.

SUMMARY OF OUR INDIVIDUAL RESPONSIBILITIES UNDER OUR CODE OF ETHICS AND PROFESSIONAL CONDUCT:

- We conduct business in compliance with our Code of Ethics and Professional Conduct.
- We comply with laws, regulations and internal policies.
- We learn and understand the requirements of our specific positions.
- We seek guidance and report concerns and violations.
- We encourage positive, transparent, fair and efficient relationships.
- We respect others.
- We avoid conflicts of interest.
- We avoid reciprocal agreements.
- We protect JSSA assets and resources.
- We provide services that meet the assessed and prioritized needs of the client.
- We safeguard health information.
- We keep accurate records.
- We follow billing guidelines.
- We support and maintain a workplace free of alcohol, drug use, smoking and weapons.
- We do the right thing, always.

Reports of suspected or actual violations of law, regulations or our policies and procedures can be made orally or in writing. It is helpful to report concerns directly to your supervisor, Human Resources, or to the Compliance and Continuous Quality Improvement Director. You may also report a concern to the Chairman of the JSSA Compliance Committee, or you may report a concern anonymously to the Compliance and Ethics Hotline.

You will not be retaliated against for reporting fraud and abuse concerns and will remain anonymous to the extent possible by law. The information provided in a report may be the basis of an internal and/or external investigation conducted by JSSA and/or its counsel. All reports will receive serious consideration and, when warranted, will be investigated.

This Code of Ethics and Professional Conduct does not provide an exhaustive overview of what is responsible, professional and ethical behavior. The ultimate responsibility to act in accordance with laws, regulations, internal policies and professional ethics always remains an individual responsibility.

Version Control

Version Number	Date	Applicable Section	Comments	Approver/Todd Schenk, CEO
V.2	05/19/15	Entire Code	N/A	