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## 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 loft 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 (the “Code of 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, developed as part of the Compliance Program, is 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, or the Director of Compliance. 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 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 Conduct, please reach out to your supervisor or to the Director of Compliance for assistance. If you believe there may have been a violation of our Code, you should report your concern to your supervisor, the Human Resources Department, the Director of Compliance, or anyone in senior management with whom you are comfortable. Should you decide that your concern needs to be reported to a third party or reported 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](http://www.lighthouse-services.com/jssa), by emailing [reports@lighthouse-services.com](mailto: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

## EXECUTIVE SUMMARY – CODE OF ETHICS AND PROFESSIONAL CONDUCT

The Jewish Social Service Agency and Premier Homecare (collectively “JSAA” for purposes of the Code of 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 approximately 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 (the “Code of Conduct”) 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 of Conduct 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.

The Code of Conduct is intended to be comprehensive and easily understood, but may require additional guidance depending on who or what is involved. For additional guidance, JSSA has a comprehensive set of protocols – Administrative, Compliance and Clinical Policies and Procedures – which expand on the principles articulated in this Code of Conduct and may provide additional clarification. They can be accessed on JSSA’s internal shared drive under Policies and Procedures.

While no single document can address every issue, you may face a situation where the right course of action is unclear. Use this Code of Conduct and any applicable protocols as guidelines along with your own good judgment. If you are unsure about how to handle a situation, stop and ask yourself the following four questions:

1. Is it inconsistent with JSSA’s values and policies?
2. Is it illegal or unethical?
3. Is it unfair or inappropriate, or does it appear to be unfair or inappropriate?
4. Would JSSA (or you) be compromised or embarrassed if it became public knowledge?

If the answer to any of the above questions is yes, then you should refrain from engaging in the conduct and immediately report the conduct if someone else is engaging in such activities. If you are still unsure or unclear about a specific issue or situation, follow these additional steps:

- Ask questions – Talk to your supervisor or program director, or contact the Director of Compliance and Continuous Quality Improvement (the “Director of Compliance”), Human Resources, or the Chief Executive Officer to seek clarification; and
- Voice concerns – Report your concerns to your supervisor or program director, the Director of Compliance, Human Resources, the Chief Executive Officer, or through JSSA’s anonymous

Compliance Hotline at calling the toll-free number at 1-844-600-0056, through the internet at [www.lighthouse-services.com/jssa](http://www.lighthouse-services.com/jssa), by emailing [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com), or by faxing your concern to 1-240-353-6339.

Above all, JSSA staff is expected to fully comply with this Code of Conduct, with established JSSA protocols, and all applicable Federal and State Laws and regulations. Staff should exhibit the highest level of professional ethics to maintain our positive reputation. Staff are also reminded of their personal obligation to report misconduct through the appropriate reporting channels.

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.

## JSSA'S MISSION, VISION, TRADITIONS AND VALUES STATEMENTS

**Mission:** JSSA empowers individuals and families to achieve well-being across their lifespan.

**Vision:** Guided by Jewish traditions and values, we strive to be the partner of choice providing integrated services that enhance quality of life for all communities.

**Traditions:** JSSA is rooted in Jewish traditions in all that it does. These Jewish tenets infuse all that we do:

- *Tikkum Olam* – Healing the world through collective and individual engagement. We feel a responsibility to give back.
- *Chesed* – Unconditional kindness, compassion and generosity. Altruism inspires our every action.
- *Kavod* – Bringing honor to ourselves, our families and the communities we belong to. We cherish human dignity and individuality.
- *Pikuach Nefesh* – Recognizing the ultimate value of human life. We devote ourselves to healing and health.
- *Teshuvah* – Faith in the ever-present possibility of growth and renewal. We work to inspire positive change.

**Values:** JSSA is guided by a set of deep-seated values. By living our values, we attain our mission. Our personal conduct and treatment of others – individuals, families, employees and community are empowered by the following core values:

- *Dignity* – We honor, respect, and esteem all individuals and serve all people with empathy, compassion and caring.
- *Integrity* – We are dedicated to strong ethical and moral principles, honesty, fairness, trustworthiness and bringing our whole selves to everything we do.
- *Hope* – We foster an optimistic outlook allowing individuals to journey through uncertainty with the promise of learning and healing that leads to a greater sense of physical and emotional well-being.

- **Inclusiveness** – We embrace the perspectives and contributions of staff, volunteers, clients and partners and incorporate the needs of our diverse communities in all that we do.
- **Responsibility** – We are accountable for ensuring that services needed by our community are accessible and available to all.
- **Excellence** – We continually strive to achieve outstanding sustainable outcomes by optimizing the effectiveness of all of our resources and nurturing a culture that opens pathways to success.

## PREMIER HOMECARE MISSION AND VALUES STATEMENTS

**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.

## BEHAVIORAL STANDARDS AND EXPECTATIONS

As a JSSA employee, your actions and attitude are a direct reflection on JSSA and the patient's perception of the overall customer service, value and quality of care provided. Therefore, it is important for all JSSA staff to understand the expectations of behavior as it relates to performing your role and interactions with patients and others. The following behavioral expectations should be practiced, met and exceeded in your everyday activities.

Everyone at JSSA is treated with fairness, dignity, courteousness, 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 partners.

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.

**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.

**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.

## **A. WORKPLACE CONDUCT AND EMPLOYMENT PRACTICES**

This section of the Code of Conduct reviews behavioral expectations of staff in the workplace and other important Human Resource policies. The Code of Conduct, in addition to JSSA's Employee Handbook and Protocols, will serve as each JSSA team member's primary reference resources for basic operations.

### **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 and the monetary value of the gift is less than or equal to \$25 (twenty five dollars). 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 or accept money from a client, a former client, and/or a client’s family member. Other than through JSSA’s Scholarship and Loan Programs, we do not loan money to a client, a former client, 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.
- JSSA staff members providing health care services to clients do not give clients, former clients, and/or a client’s family member(s) 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.

### Conflict 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 relatives<sup>1</sup> 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 value<sup>2</sup> from clients, family members of clients, colleagues, volunteers, consultants, vendors, business associates or board members.<sup>3</sup>
- Not establishing or using funds, money or assets for reciprocal agreements<sup>4</sup>, 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 directly supervise their relatives or work in the same unit as relatives. All potential conflicts of interest that may arise due to familial relationships between JSSA staff members must be reported in accordance with JSSA’s Conflict of Interest Policy. In certain instances, some staff members may also be JSSA clients. In those instances, the policies applicable to the role the individual

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<sup>1</sup> 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.

<sup>2</sup> Significant value is defined as an item or gift with a value above \$25

<sup>3</sup> Premier Homecare employees should refer to Premier Homecare’s Gift Acceptance Policy.

<sup>4</sup> 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.

is then serving (e.g., as either a client or a staff member) will govern the individual's actions at that time.

- 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.

### Equal Opportunity Employer

JSSA is an equal opportunity employer in both spirit and practice and does not discriminate against any employee or applicant for employment because of race, color, religion, creed, national origin, age, disability, sexual orientation, or gender identity or any other status protected by applicable federal, state, and/or local laws, ordinances and regulations. Moreover, JSSA does not and will not tolerate any form of harassment or retaliation against any employee for protesting alleged discrimination, for cooperating in the investigation of such complaint, or for prior involvement in any action as an aggrieved party, witness, or responding official. Any JSSA employee who is found to have engaged in discrimination, retaliation, and/or harassment will be subject to disciplinary action, up to and including termination of employment.

JSSA is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment and retaliation. Therefore, JSSA expects that all relationships among persons in the workplace will be businesslike and free of bias and prejudice.

This policy of equal employment opportunity applies to all policies and procedures relating to recruitment and hiring, compensation, benefits, termination, and all other terms and conditions of employment. Violations of our equal employment policy will not be permitted and violations

of this policy should be reported to the employee's supervisor, the Director of Human Resources, or the Director of Compliance. If you have questions or concerns, please contact your manager or the Human Resources Department.

### Harassment and Discrimination

JSSA is committed to providing a work environment that is free of unlawful discrimination and harassment. Decisions, behavior or comments based on an individual's race, color, religion, creed, national origin, age, disability, sexual orientation, or gender identity, or any other status protected by federal, state, or local law will not be tolerated, whether such acts are by an employee, patient, family member, medical provider, or vendor.

Sexual harassment is one form of conduct prohibited by this policy. Unwelcomed sexual advances or verbal or physical conduct of a sexual nature which is made a condition of continued employment, forms the basis for any employment decision, or otherwise interferes with an employee's work performance, or that creates an intimidating or offensive working situation will not be tolerated. Behaviors that engender an intimidating or offensive working situation may include, but are not limited to, offensive comments, jokes, innuendoes, and other sexually-oriented statements, printed material, material distributed through electronic media, or items posted on walls or bulletin boards.

Any employee who has experienced, or has any knowledge of, an incident of discrimination or harassment based on any protected status should promptly report the incident to his or her direct supervisor, the Director of Compliance, the Director of Human Resources, or through JSSA's Compliance and Ethics Hotline.

Complaints will be investigated promptly and confidentially, as circumstances allow. All complaints will be reported to the Director of Compliance, who will determine, in consultation with Human Resources, legal counsel, and other members of management, the most appropriate JSSA staff member to conduct the investigation. All employees are expected to cooperate fully in any investigation. No employee will be subject to retaliation for making a complaint in good faith or for participating in an investigation so long as the employee provides truthful and accurate information in response to questions posed during the investigation. Any employee retaliating against another employee for reporting a policy violation or for participating in an investigation will be subject to disciplinary action up to, and including, termination.

Prompt remedial action will be taken in the event a violation of this policy is found to have occurred. If the circumstances involve an adverse employment action taken by a supervisor (such as termination, demotion, disciplinary action or not awarding a raise or promotion), that action will not be considered final until an investigation has been conducted and a determination as to the complaint has been made. JSSA will not terminate any employee for a suspected compliance violation without the prior notice of the Director of Compliance.

Anyone engaging in conduct prohibited by this policy will be subject to disciplinary action, up to and including termination of employment. This includes off-hours, off-premises conduct which may be scrutinized if an employee is present by virtue of employment status.

### Workplace Violence / Weapons

JSSA believes that all employees should be able to enjoy a workplace free from violence, harassment and threats. JSSA will not tolerate workplace violence committed by or against employees, patients, or visitors. JSSA will take appropriate responsive action against reports of workplace violence, including disciplinary action up to, and including, termination for any employee found to have committed workplace violence. Any incident involving violence in the workplace will be reported to the appropriate law enforcement authorities.

Workplace violence includes not only physical attacks, but also threats of violence, stalking, or other verbal or physical conduct of a violent or intimidating nature, which has the purpose, or effect of creating a dangerous, unsafe, intimidating or violent working environment. Further, all forms of weapons – e.g., knives, guns, sprays or other offensive weapons – are prohibited from JSSA's premises and in vehicles owned or leased by JSSA. All employees are prohibited from engaging in any act that might constitute workplace violence. Any employee who engages in such activity is subject to discipline, up to and including termination of employment.

Employees who believe they are victims of workplace violence, or who observe violence in the workplace, shall immediately report such incidents to their supervisor, the Director of Compliance, the Director of Human Resources, or another member of senior management. Reports of violence involving a member of management should not be reported to that person, but rather to Directors of Compliance or Human Resources, or through JSSA's Compliance and Ethics Hotline.

JSSA will take pre-emptive measures to reduce the risk of workplace violence including conducting: (1) background investigations prior to hiring new employees to reduce the risk of hiring individuals with a history of violent behavior, and (2) periodic inspections of all JSSA premises to evaluate and determine any vulnerability to workplace violence and taking any necessary corrective action upon identifying such vulnerabilities.

Additionally, JSSA team members 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 his/her JSSA identification card when required while at any agency program or building.
- Adhering to all JSSA policies, practices and training instituted to help safeguard JSSA assets including property, intellectual property, cars, equipment, materials, products, plans, client and fiscal records and reports, ideas and data.

### Drug-free Workplace

JSSA is committed to providing a safe work environment and to fostering the well-being and health of its employees, patients, and clients. This commitment is jeopardized when any JSSA employee illegally uses drugs on or off the job, comes to work under their influence, possesses,

distributes or sells drugs in the workplace, uses alcohol in the workplace,<sup>5</sup> or allows the use of alcohol to affect them while at work. Regardless of any state law to the contrary, JSSA employees are prohibited from the recreational use of marijuana prior to performance of work for JSSA, or while on JSSA premises.

The possession, use, transfer, distribution, dispensing, manufacture or sale of illegal drugs, legal drugs without a valid prescription (including the use of medical marijuana without the documentation required for such use by the applicable state), drug-related paraphernalia, or alcohol on JSSA property, whether on or off duty, is prohibited. To the extent any such activity impairs an employee's ability to perform his or her job or adversely affects the reputation or integrity of JSSA, these activities are prohibited during working and nonworking hours, whether on or off JSSA property. Additionally, JSSA requires employees to disclose if they are medically required to take a prescription medication that may impact their job performance. Violation of this policy will result in disciplinary action up to and including termination of employment.

To enforce this policy, JSSA reserves the right to implement drug and alcohol testing, searches, locker or desk inspections, entrance inspections, and inspections of personal property brought on the premise. Any employee entering any JSSA premises, for any purpose, is deemed to consent to such searches for the purpose of ensuring compliance with JSSA's Drug and Alcohol Use policy. Employees are also subject to "for cause" testing for prohibited substances. All information involving medical examinations, counseling, rehabilitation, or treatment will be treated as confidential medical information.

Some of our employees may have access to prescription drugs, controlled substances, and other medical supplies. Many of these substances are governed by specific regulatory organizations and must be administered pursuant only to a valid physician order. To minimize risks to patients and to JSSA, prescription and controlled medications and supplies must be handled properly and only by authorized individuals. If one becomes aware of inadequate security of drugs or controlled substances or the diversion of drugs from the organization, the incident must be reported immediately to a supervisor or the Director of Compliance.

#### **OSHA Compliance – Health and Safety**

JSSA affiliates will comply with all government regulations and rules, policies, and required facility practices that promote the protection of workplace health and safety. It is important that all employees immediately advise their supervisor of any workplace injury or any situation presenting a danger of injury so timely corrective action may be taken to resolve the issue.

#### **Relationships with Vendors and Suppliers**

We must manage our subcontractor and supplier relationships in a fair and reasonable manner, free from conflicts of interest and consistent with all applicable laws and good business practices. Our selection of subcontractors, suppliers, and vendors will be made based on objective criteria, including quality, technical excellence, price, delivery, and adherence to schedules, service, and

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<sup>5</sup> JSSA employees may partake in reasonable amounts of alcohol when alcohol is provided as part of a workplace event. However, under no circumstances will JSSA clinical staff partake of alcohol and then provide services to JSSA clients or patients.



maintenance of adequate sources of supply. Our purchasing decisions will be made on the suppliers' ability to meet our needs, and not on personal relationships, friendships, or the improper offering of remuneration by the supplier (e.g., the supplier's offer to provider JSSA or an JSSA employee with money, expensive meals, entertainment activities such as free rounds of golf or concert tickets, travel, etc.).

### Ineligible Persons

We do not contract with, employ, or bill for services rendered by an individual or entity that is (1) excluded or ineligible to participate in the federal health programs; (2) suspended or debarred from government contracts; or (3) has been convicted of a criminal offense related to the provision of health items or services and has not been reinstated in a health program after a period of exclusion, suspension, debarment or ineligibility, provided that we are aware of such offense. We screen all new employees, and we regularly screen all employees, staff physicians, and vendors against the U.S. Department of Health and Human Service Office of Inspector General Exclusion list, the Systems for Award Management (SAM) list, and applicable state Medicaid exclusion lists.

### Antitrust

We will avoid entering into agreements or practices that could be views as "in restraint of trade" such as price-fixing or coordinating prices, boycotting suppliers or customers, market allocation, pricing intended to run a competitor out of business, disparaging, misrepresenting or harassing a competitor, stealing trade secrets, bribery and kickbacks.

### Environmental Compliance

We will promote sound environmental and safety practices that will prevent damage to the environment and enhance community resources. We will be responsible for the proper handling of medical or hazardous waste.

### Personal Use of JSSA's Resources

It is the responsibility of each JSSA associate to preserve our organization's assets including time, materials, supplies, equipment, and information. JSSA's assets are to be maintained for business related purposes only. The personal use of any JSSA asset without prior supervisory approval is prohibited. Any community or charitable use of organization resources must be approved in advance by one's supervisor. Any use of JSSA's resources for personal financial gain unrelated to the organization's business is prohibited.

## **B. COMPLIANCE PROGRAM**

JSSA has designed and instituted a Corporate Compliance Program consisting of, the compliance program, the Code of Conduct, Employee Handbook, Policies and Procedures, and Operation Manuals (collectively, the "Compliance Program"), to ensure compliance with laws and regulations. Our program is designed to monitor high-risk areas and ever-changing federal and state regulations and health care program requirements. While a "structured" program, the fluidity of regulatory changes makes our Compliance Program an ever-evolving process. At its core, the Compliance Program is based on the elements of an effective compliance program



identified by US Department of Health and Human Services Office of Inspector General (HHS-OIG) which include:

- Designation of a compliance officer and compliance committees;
- Development of compliance plans and policies;
- Systems for monitoring, detecting and addressing compliance concerns;
- Hotlines and other lines of communication;
- Enforcement and disciplinary policy;
- Training and education; and
- Investigation and response.

JSSA's Compliance Program involves developing resources (including policies and procedures, training programs, audit plans, and communication tools) and providing support (including operating the Compliance and Ethics Hotline, conducting program assessment, and providing advice) to JSSA and its affiliates. The Director of Compliance is responsible for Compliance Program implementation, and the day-to-day oversight of JSSA's compliance program. The Director of Compliance also serves as the designated Privacy Officer. JSSA's Chief Information Officer also serves as the Health Information and Security Officer ("HISO"). The Director of Compliance and the HISO work together to ensure compliance with all HIPAA Privacy and Security regulations.

JSSA's Board Compliance Committee is responsible for compliance oversight and ensuring that the compliance program elements will be thoroughly communicated across the organization through the Director of Compliance to all of the various departments and locations. This committee meets on a regular basis to discuss ongoing audits and projects and to ensure that all compliance initiatives are executed properly. The committee will assist the Director of Compliance in determining the issues and concerns that need to be reported to the full Board of Directors.

### **Monitoring and Auditing**

The Director of Compliance coordinates necessary internal reviews or audits on an annual basis or as needed based on a specific concern. An annual compliance audit work plan is developed based on the OIG Annual Work Plan, other federal and state regulatory guidance, and on specific areas of concerns identified either internally or within the health care industry. Compliance audits will be focused on ensuring that all applicable laws, regulations, and compliance policies and procedures are being followed. Underpayments or overpayments from various sources may be discovered during a compliance audit and will be handled appropriately, including reporting and returning all applicable overpayments in accordance with JSSA's Overpayment Policy.

### **Training and Education**

JSSA provides initial orientation and continuing education for all new and existing employees, and employees must complete annual compliance training. The Human Resources Department and Director of Compliance utilize a variety of training resources such as computerized training programs in addition to focused one-on-one and group training. Our system allows us to tailor

compliance education to specific departmental needs and to monitor training participation and effectiveness.

### Mechanisms for Reporting

JSSA is committed to creating the best work environment; a place where everyone's voice is heard, where issues are promptly raised and resolved, and where communication flows across all levels of the agency. The essence of JSSA's Open Door Policy is open communication in an environment of trust and mutual respect that creates a solid foundation for collaboration, growth, high performance and success.

JSSA encourages open communication, feedback, and discussion about any matter of importance to an employee. Employees are encouraged to resolve any issues or concerns with the person directly or with his/her immediate supervisor first, however, an employee may approach other appropriate JSSA staff members (e.g., supervisor, program director, Human Resources, Director of Compliance, the Chief Executive Officer or another member of senior management).

JSSA prohibits retaliation by or on behalf of the agency against employees for making good faith reports or inquiries, or for participating in a review or an investigation.

*See the Whistleblower Policy, Compliance and Ethics Hotline Policy, and the Complaint and Grievance Policy for additional information.*

The Director of Compliance oversees a compliance hotline program. The Compliance and Ethics Hotline reporting system allows anyone to report concerns anonymously and confidentially through the internet, by calling the toll-free number, by email, or by fax.

Hotline calls and all formal grievances (reported in accordance with JSSA's Grievance Policy) are received, logged, and reviewed by the Director of Compliance, who is responsible for determining the member of JSSA's Senior Management who is best situated to investigate the allegation(s) raised by the hotline call and to follow-up on any potential issues. Hotline call information is shared with the Board Compliance Committee, the CEO, and the Board of Directors, to the extent the Board Compliance Committee believes such information should be conveyed to the full Board of Directors. To investigate all hotline calls, the Director of Compliance will coordinate with the appropriate departmental staff based on the reported and perceived identified violation.

Additionally, our workforce is consistently encouraged, through new employee orientation, annual training, and ad-hoc meetings, conversations or audits to bring any issues and concerns to their supervisor or manager, program director, senior management, or the Director of Compliance,. Our goal is to encourage our employees to discuss concerns or perceived violations of the Code of Conduct with the appropriate individual.

Another important resource in being able to address issues arising out of the Code of Conduct is Human Resources, which works closely with the Director of Compliance on many issues across all JSSA departments and locations. Human Resources is very knowledgeable about many of the compliance risk areas described in the Compliance Program, the Code of Conduct, and the

Protocols that pertain to employment in the workplace, and he or she is responsible for overseeing compliance with various employment laws. If a concern relates to specific details of an individual's work situation, rather than the larger issues of organizational compliance, the Director of Human Resources is the most appropriate individual to contact.

### **Personal Obligation to Report**

Each JSSA employee has an individual responsibility for reporting any activity by an employee, medical provider, subcontractor, or vendor that appears to violate applicable laws, rules, regulations or our Compliance Program, Code of Conduct, Employee Handbook, or Protocols. All matters should either be reported to the employee's supervisor or manager, program director, senior management, the Director of Compliance,. Your input is essential in supporting a positive and ethical organizational culture throughout JSSA.

### **Resolution of Problems and Concerns**

Positive relations and morale can best be achieved and maintained in a working environment where ongoing and open communication exists among supervisors and personnel. This includes candid discussions of our problems and concerns. JSSA employees are encouraged to express their concerns and opinions on any issue regarding potential violation of laws, regulations, ethics, policies or procedures or the JSSA Compliance Program, Code of Conduct, Employee Handbook, or Protocols. Initially, all employees should contact their own supervisor or human resources representative. If the concerns remain unresolved, employees should raise the issues with individuals at the next supervisory level, up to and including the Director of Compliance and the highest level of management.

### **Non-Retaliation Policy**

JSSA has a strict non-retribution and non-retaliation policy. This means no action of retaliation or reprisal will be taken against anyone for calling the Compliance Hotline or using the anonymous email or fax addresses to make a report, complaint, or inquiry. However, calls to the Hotline do not protect callers from appropriate disciplinary or legal action regarding their own performance or conduct. The Director of Compliance will evaluate and respond to all allegations of wrongdoing, concerns, and/or inquiries made to the Hotline in an impartial manner. The Director of Compliance will respect and protect the rights of all personnel, including anyone who is the subject of a Hotline complaint. To this end, all allegations will be thoroughly investigated and verified before any action is taken. No employee may be terminated for a compliance-related violation without the prior notice of the Director of Compliance.

### **Compliance and Ethics Hotline**

JSSA recognizes that there will be times when concerns cannot be properly addressed through the normal chain of command. Under such circumstances, personnel are encouraged to report their concerns through the Compliance Hotline or through the anonymous email or fax addresses. These anonymous reporting mechanisms should be used to convey questions and report any issue or concern including known instances of fraud or violations of law without fear of retaliation or negative consequences.

We all have the duty to report any suspected problems or issues, even if they do not directly involve us. Knowledge of a violation, which is not reported, may result in serious consequences in the same manner as taking part in the perceived violation.

All callers to the hotline may remain anonymous. If callers choose to identify themselves, their confidentiality will be protected to the extent permitted by law.

See the Compliance and Ethics Hotline Policy for other anonymous compliance reporting information.

### Corrective Actions

Where an internal investigation substantiates a reported violation, JSSA will initiate corrective action, including, as appropriate, making prompt restitution for any overpayment amounts, notifying the appropriate government agency, instituting whatever disciplinary action is necessary, and implementing systemic changes to prevent a similar violation from occurring in the future. All violators of the Compliance Program, Code of Conduct, Protocols, or other policies of JSSA, will be subject to disciplinary action.

### Inappropriate Conduct

Actions which violate JSSA's corrective discipline policy can result in discipline or termination and include, but are not limited to, the following:

- Unsatisfactory performance
- Violations of the behavioral standards
- Accessing PHI without a valid need
- Falsifying records
- Fighting, gambling, or carrying weapons on any JSSA property
- Possession of intoxicating beverages or illegal drugs on JSSA property
- Drinking of alcohol or use of illegal drugs during the work day, or reporting to work 'under the influence'
- Insubordination
- Theft or dishonesty
- Harassment of any kind – verbal, emotional, or physical
- Lewd, derogatory or offensive language
- Failure to report emergencies
- Dishonest activities
- Divulging confidential information
- Sleeping on the job
- Discourtesy to staff or patients
- Coercion of fellow employees
- Disregard of fire and safety regulations
- Excessive or repeated absences or tardiness
- Except as otherwise permitted by JSSA's Compliance Program, accepting a tip or a personal gift from patients, visitors, or vendors
- Inappropriate use of the Internet (see section on Access to Electronic and Social Media)
- Damaging, destroying, or the inappropriate use of JSSA's property

### Acknowledgment Process

JSSA requires all employees to sign an acknowledgment confirming that they received the Compliance Plan and Code of Conduct, understand it represents mandatory policies of JSSA and agree to abide by their terms. All new employees are required to sign this acknowledgement as

a condition of employment and on an annual basis if changes occur. Each JSSA employee is also required to participate in the annual compliance training and documentation of training will be retained. The acknowledgement can be found on the last page of this document.

## C. PRIVACY AND CONFIDENTIALITY

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 Director of Compliance.

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.

### **Retention and Disposal of Documents and Records**

Each JSSA employee is responsible for the integrity and accuracy of our organization's documents and records, not only to comply with regulatory and legal requirements but also to ensure records are available to support our business practices and actions. Destruction of records is handled by a shredding company and each JSSA location has locked shred bins to protect PHI before the documents are destroyed by the shredding company. No one may alter or falsify information on any record or document. Records must never be destroyed in an effort to deny government authorities that which may be relevant to a government investigation. Medical and business documents and records are retained in accordance with the law and our Record Retention Policy, which can be found on JSSA's internal share drive. In accordance with JSSA's Record Retention Policy, JSSA will comply with any legal holds issued, and no-one is permitted to alter or destroy any records or documents, in any medium, that are subject to the legal hold.

### **Information Security and Confidentiality**

Confidential information about our organization's strategies and operations is a valuable asset. Although JSSA employees may use confidential information to perform their jobs, such confidential information must not be shared with others unless the individuals and/or entities have a legitimate need-to-know to perform their specific job duties or carry out a contractual business relationship. In addition, these individuals and/or entities must have agreed to maintain the confidentiality of the information. Confidential information includes personnel data maintained by JSSA, patient lists and clinical information, patient financial information, passwords, pricing and cost data, and other practice-specific financial data and reports.

To maintain the confidentiality and integrity of patient and confidential information, such information should be sent to outside parties only in accordance with information security policies and standards, which require, among other things, that the information be encrypted. We exercise due care and due diligence in maintaining the confidentiality, availability, and integrity of information assets the organization owns or of which it is the custodian. In addition, no JSSA employee will disclose protected health information to a JSSA business associate without first ensuring that JSSA and the business associate have entered into a business associate (BA) agreement. JSSA employees should refer to the HIPAA Privacy and Security Program, which can be found on JSSA's internal share drive, for further guidance.

Because so much of our clinical and business information is generated and contained within our computer systems, it is essential that each JSSA employee protect our computer systems and the information contained in them by not sharing passwords, and by reviewing and adhering to our information security policies and guidance, including the HIPAA Privacy and Security Program. Sharing of passwords between employees or between employees and others outside of JSSA is a violation of JSSA's policies, and the employee(s) will be subject to disciplinary action, up to, and including, termination.

#### **Access to Electronic and Social Media**

All communications systems, including but not limited to electronic mail, Internet access, networks, computer equipment, telephones, and voice mail are the property of JSSA and are to be used primarily for business purposes. All users of JSSA's computer and telephonic systems should presume no expectation of privacy in anything they access, create, store, send, or receive on the computer and telephonic systems, and JSSA reserves the right to monitor and/or access all communication usage and content at any time.

Employees may not use the Internet at work to access, post, store, transmit, download or distribute any (1) threatening materials, (2) knowingly, recklessly or maliciously false materials, (3) obscene materials, (4) offensive materials, or (5) anything violating any laws. Employees who abuse our communication systems or use them excessively for non-business purposes may lose these privileges and be subject to disciplinary action. Inappropriate use of the Internet is not tolerated. Use of the Internet is strictly limited for business purposes, and any violation thereof may be subject to disciplinary action. JSSA prohibits use of e-mail or the Internet to access any inappropriate, unprofessional, offensive, lewd, or disruptive messages or websites. JSSA may restrict access to certain websites based on job type and responsibility.

#### **Intellectual Property**

All intellectual property conceived or created during an employee's period of employment with JSSA shall be the sole and exclusive property of JSSA. As a condition of employment and/or continued employment, each employee assigns to JSSA all rights in any such intellectual property. Employees are required to promptly and fully disclose to JSSA all such intellectual property and to protect such intellectual property from any unauthorized disclosure, use, transfer or sale. Employees may also be required to execute an assignment of all rights, title, or interest in and to intellectual property. Any questions should be directed to Human Resources.



## **D. STANDARDS OF PROFESSIONAL AND BUSINESS CONDUCT**

JSSA staff is directed to provide health care services in accordance with federal, state, and local laws and regulations, and the conditions of participation for federal health programs. Such laws, regulations, and conditions of participation may include, but are not limited to, subjects such as medical necessity, licenses or permits, accreditation, consent to treatment, medical record keeping, access to medical records and confidentiality, patient rights, staff membership and clinical privileges, and Medicare and Medicaid program requirements.

We have developed policies and procedures to address many regulatory requirements. However, it is impractical to develop policies and procedures that encompass the full body of applicable law and regulations. Anyone aware of violations of suspected violations of laws, regulations, the conditions of participation, or of JSSA's Compliance Program, Code of Conduct, Protocols, or policies and procedures must report them immediately to a supervisor or member of management, Human Resources, the Director of Compliance, or the Compliance Hotline.

### **Quality of Care**

JSSA is committed to providing high-quality care and delivering services that are responsible, appropriate, safe, and cost-effective. We treat our patients with respect and dignity, and we provide care that is both necessary and appropriate. We are very proud of our tradition of caring, and we strive to deliver healthcare compassionately and with integrity. Please be aware that we all have a duty to report any actual or perceived quality of care or other issues to management, the Director of Compliance, Human Resources, or the Compliance Hotline.

### **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.

### Receiving Business Courtesies – Accepting Tips and Gifts

Except as set forth herein, JSSA prohibits the solicitation or acceptance of tips, gifts, meals or personal gratuities from patients, health care vendors, other health care providers or suppliers, or pharmaceutical or device manufacturers or distributors in conjunction with the health care services provided by JSSA. The acceptance of small tokens of appreciation from clients, which are valued at less than or equal to \$25 (twenty five dollars) is permitted. The acceptance of small tokens of appreciation or perishable goods, such as candy or flowers, is permitted when given to a location only and shared with all staff. The acceptance of modest meals (including snacks and beverages) for educational purposes is permitted only in conjunction with legitimate training and educational programming by a vendor or manufacturer and must be approved by the Director of Compliance and the Chief Executive Officer, as necessary. Only JSSA staff who participate in the educational programming may partake in the meal. Any solicitation and/or acceptance of gifts or hospitality by vendors or potential vendors must be disclosed. If an employee has doubt as to the appropriateness of a gift, meal, etc., he or she should seek guidance from the Director of Compliance. The offer of any gift, benefit, or other business courtesy from any non-health care related vendor where the value of such gift, benefit, etc. exceeds \$50 (fifty dollars), must be reported to, and approved by, the Director of Compliance.

### Entertainment, Social Events, and Educational Opportunities

We recognize there will be times when a current or potential business associate may extend an invitation to attend an entertainment, social, or educational event to further develop a business relationship. Some of these instances involving business associates that provide products or services related to the provision of health care service (e.g., other medical providers, pharmaceutical or device manufacturers, etc.) may raise questions on whether the acceptance of such invitations meet regulatory standards. All such invitations must be reported to the Director of Compliance who will log the invitations, as well as the guidance provided by the Director of Compliance with respect to whether such invitations may be accepted. The Director of Compliance will assess the appropriateness of the invitation and determine whether the individual to whom the invitation was issued may accept the invitation. When making such a determination, the Director of Compliance will consider (1) the type and nature of the invitation,

including the potential value of the invitation, (2) whether there is a legitimate business purpose for accepting the invitation, and (3) whether the legitimate business purpose could be accomplished through some other means. Examples of appropriate invitations may include invitations to participate in training and educational opportunities.

### Gifts

Except as set forth herein, JSSA prohibits the acceptance of gifts or tokens of appreciation made to individual JSSA employees.

### Extending Business Courtesies or the Provision of Gifts or Other Items of Value

The provision of any business courtesies provided by JSSA to physicians or other health care providers or persons who are in a position to refer patients to JSSA must be undertaken in strict accordance with our policies, which have been developed consistent with federal laws, regulations, and rules regarding these practices. JSSA employees must consult with the Director of Compliance prior to extending any business courtesy to a potential referral source.

JSSA employees may entertain potential or actual clients, board members, or donors if such entertainment is consistent with JSSA's business practice, the Code of Conduct, does not violate any law or generally accepted ethical standards, and the public disclosure of the facts surrounding the provision of the entertainment will not embarrass JSSA. A de minimis item or gesture having a monetary value of less than \$25 may also be permitted provided it is not offered or received as a quid pro quo. Questions about the provision of such entertainment or items or services should be directed to the Director of Compliance.

### Solicitation and Distribution

To avoid disruption of operations and disturbance of patients, families, and visitors, the following rules apply to solicitation and distribution of any type on any property owned, operated or otherwise a part of JSSA.

Employees, as well as non-employees, are prohibited from soliciting any patients or family members, and are prohibited from distributing any solicitation materials to any patients, guests, or family members. Distribution of literature and fundraising materials is prohibited in working areas at any time, except for approved JSSA fundraising events. Notwithstanding the foregoing, employees are permitted to post fundraising materials on their office doors, or to otherwise passively post fundraising materials in non-public and non-patient areas. Employees are prohibited from actively soliciting donations from co-workers, including asking co-workers if they would like to purchase specific items (e.g., cookies or popcorn) or donate to a specific cause or event.

The use of any electronic communication medium, computer, Internet, network, e-mail, cellular or other service or system provided by or otherwise the property of JSSA for either solicitation or distribution is prohibited. Solicitation for any purpose and distribution of literature of any kind by non-JSSA employees is prohibited at all times on JSSA premises, including in parking areas.

### Coding and Billing for Services

JSSA is committed to honesty, accuracy, and integrity in all its billing, coding, and documentation activities. Towards this end, JSSA has implemented billing and coding SOPs applicable to its various departments (e.g., hospice) All providers have a duty to comply with any applicable billing and coding SOPs and to report any actual or perceived false claim, misrepresentation, inaccuracy, or problem in billing, coding, or documentation to management, the Director of Compliance, Human Resources, or the Compliance and Ethics Hotline.

- We will only submit claims for services actually rendered that are documented in patients' medical records, using billing codes that accurately describe the services provided.
- Submission of any claim for payment or reimbursement that is false, fraudulent, inaccurate, or fictitious is prohibited.
- All claims submitted for payment must be for services that are properly coded and supported by applicable medical necessity requirements.
- We shall take all timely and necessary steps to alert appropriate payers if inaccuracies are discovered in claims that have been submitted for reimbursement. This includes reporting and returning any overpayments from federal or state health care payers.

### Federal False Claims Act

The Federal False Claims Act (FCA) prohibits knowingly making a false claim against the government. False claims can take the form of overcharging for a product or service, delivering less than the promised amount or type of service, delivering less than the promised amount or type of goods or services, underpaying money owed to the government (including failure to report and return overpayments to the government), and charging for one thing while providing another.

- Penalties: The FCA imposes civil penalties and is not a criminal statute. Therefore, no proof of specific intent as required for violation of a criminal statute is necessary. Persons (including organizations) may be fined a civil penalty, plus three (3) times the amount of damages sustained by the government for each false claim. The amount of damages in health care terms is the amount paid for each false claim filed.
- Non-Retaliation: Anyone initiating a FCA case may not be discriminated or retaliated against in any manner by their employer by virtue of bringing the claim. The employee is authorized under the FCA to initiate court proceedings to make themselves whole for any job-related losses resulting from any such discrimination or retaliation.

### Interactions with Health Care Providers – Bribes or Kickbacks

Federal and state laws and regulations govern the relationship between JSSA and physicians and other health care providers who may refer patients to the facilities. The applicable federal laws include, among others, the Anti-Kickback Law and the Stark Law.

All employees who interact with physicians, particularly regarding making payments to physicians for services rendered, leasing space, recruiting physicians to the community, and arranging for physicians to serve in leadership positions in facilities, shall be aware of the requirements of the laws, regulations, and policies that address relationships between facilities and physicians.

If relationships with physicians are properly structured, but not diligently administered, failure to administer the arrangements as agreed may result in violations of the law. Any business arrangements with a physician must be structured to ensure compliance with legal requirements, our policies and procedures, and with any operational guidance that has been issued.

Keeping in mind that it is essential to be familiar with the laws, regulations, and policies that govern our interactions with physicians, the following principles govern our interactions with physicians:

- We do not pay for referrals. We accept patient referrals and admissions based solely on the patient's medical needs and our ability to render the needed services. We do not pay or offer to pay anyone for referrals of patients.
- We do not accept payments for referrals we make. No employee or any other person acting on behalf of JSSA is permitted to solicit or receive anything of value, directly or indirectly, in exchange for the referral of patients. Similarly, when making patient referrals to another health care provider, we do not take into account the volume or value of referrals that the provider has made (or may make) to us.
- Contract payments or other benefits provided to clinicians and referral sources must be for the services provided and at the fair market value rates called for in the contract and must be specifically approved in advance. Every payment must be supported by proper documentation that the services contracted for were provided. The Finance Department and Patient Accounts, in conjunction with the CFO, must approve all contract payments or other benefits provided to clinicians and referral sources.

For additional information on permitted interactions with physicians and other health care providers, see JSSA's Fraud, Waste, and Abuse Policy, which is available on JSSA's internal share drive.

### **Government Investigations, Surveys, and Accreditation**

From time to time, government agencies and other entities may conduct investigations or surveys in our facilities, and we respond with openness and by providing accurate information. In preparation for, or in conducting, an investigation, survey, or inspection, JSSA employees must never conceal, destroy or alter any documents, lie, or make misleading statements to the agency representative. Employees also must never attempt to cause another employee to fail to provide accurate information or obstruct, mislead, or delay the communication of information or records relating to a possible violation of law.

In preparation for, during, and after surveys JSSA employees will deal with all accrediting bodies in a direct, open, and honest manner. No action should ever be taken in relationships with accrediting bodies that would mislead the accreditor or its survey teams, either directly or indirectly.

The scope of matters related to accreditation of various bodies is extremely significant and broader than the scope of this Code of Conduct. The purpose of our Code of Conduct is to provide general guidance on subjects of wide interest within the organization. Accrediting bodies may address issues of both wide and somewhat more focused interest.

## **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.

## **JSSA CODE OF ETHICS AND PROFESSIONAL CONDUCT: STAFF ACKNOWLEDGEMENT AND ATTESTATION**

### **JSSA Confidentiality Agreement**

I understand, in the course of my employment or association with JSSA that I am required to maintain the confidentiality of my employer, employee, and practitioner and patient information. I understand it is my responsibility to follow JSSA's policies and procedures as they relate to the assurance of patient rights and the confidentiality of all information, both patient and other business information, in any medium (written, electronic, or oral). As a condition of my employment or other affiliation with JSSA, I understand I must sign and comply with this Confidentiality Agreement. By signing this Agreement, I understand and agree to the obligations stated herein. \_\_\_\_\_ **Initials**

### **Computer Systems**

I understand, in the course of my employment and/or association with JSSA, that I may be permitted to utilize online computer systems in order to fulfill my workforce responsibilities. If this is required, I understand personal access code(s), user ID(s), access key(s), and password(s) identify me to the online computer system(s). Accordingly, I will maintain their confidentiality and not reveal them to others. If at any time I feel their integrity has been compromised, I will change their value immediately if I have the authority to do so. If I do not have that authority, I will immediately contact JSSA's Help Desk (Ntiva) or JSSA's subject matter experts (SMEs), as appropriate, and request a new code or password. I further understand any information I access from the online computer is strictly confidential and is to be used only in the performance of my duties and responsibilities as an employee or workforce member of JSSA. \_\_\_\_\_ **Initials**

I understand I may not access any JSSA system for personal reasons without prior approval of my supervisor. I understand that any and all transmissions or data utilized or stored on any JSSA system is subject to review and inspection by JSSA at any time, and that no employee may claim any right of personal privacy in the use of any JSSA system or of data or communications utilizing said system. I hereby waive any and all such rights and consent to any such review or inspection, at any time, with or without cause, and with or without notice. I will not access or view any information other than what is required to do my job. If I have any questions about whether access to certain information is required for me to do my job, I will immediately ask for clarification from a manager, director, or the Privacy Officer prior to access. \_\_\_\_\_ **Initials**

### **Patient Information**

I am aware I am not authorized to discuss any information concerning a patient's personal data or medical condition unless specifically identified as a part of my duties, and then discussion may only occur with other professionals specifically involved in that patient's treatment, payment, or related healthcare operations. I am also responsible for ensuring conversations regarding patient information are held in appropriate locations with the appropriate individuals. I understand the need to be equally cautious when the information to which I have access is that of an employee or person with whom I am acquainted. I will not make inquiries about information for which I do

not have authorization to access or make an inquiry to any individual or party who does have proper authorization to access such information.

I will not make any unauthorized transmissions, copies, disclosures, inquiries, modifications, or deletions of patient information or confidential information. Such unauthorized transmissions include, but are not limited to, removing and/or transferring patient information or confidential information from any JSSA computer system to unauthorized locations (for instance, home).

\_\_\_\_\_ *Initials*

**Patient Information and Media Relations**

I agree my obligations under this agreement regarding patient information will continue after the termination of my employment/assignment with JSSA. I understand that any confidential or patient information that I access at JSSA does not belong to me. I understand a violation of this agreement may result in corrective action and/or termination of employment and/or association with JSSA. I understand that if any breach of confidentiality of information results in a claim or suit for damages against JSSA or any of its subsidiaries, JSSA may seek indemnification for damages related to my actions. I also may be subject to personal civil and criminal legal penalties. I understand that any workforce member suspected of failure to maintain this confidentiality will be carefully reviewed and, if substantiated, be subject to corrective action and/or termination in accordance with established policies and procedures.

\_\_\_\_\_ *Initials*

**I have received a copy of the JSSA Code of Ethics and Professional Conduct either electronically or in hard copy format.** I understand that it constitutes a summary of JSSA's behavioral expectations, and that as an JSSA workforce member I am responsible for acting in compliance with them, as well as all others JSSA policies and procedures. I also understand that neither this Code of Ethics and Professional Conduct nor any other communications by employer representatives, written or oral, is intended in any way to create an employment contract binding on either party.

Printed Name: \_\_\_\_\_

Employee Signature: \_\_\_\_\_

Hire Date: \_\_\_\_\_ Attestation Date: \_\_\_\_\_

Position or Job Title / Location: \_\_\_\_\_

**For Non-Employee - Vendors / Contractors / BA / Students / Guests:**

Printed Name: \_\_\_\_\_

Position / Job Title: \_\_\_\_\_ Company: \_\_\_\_\_

Signature: \_\_\_\_\_

Project Start Date: \_\_\_\_\_ Attestation Date: \_\_\_\_\_