

## Code of Ethics

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**PURPOSE:** To set standards and clarify expectations to assure that SelfRefind conducts its business fairly, impartially, in an ethical and proper manner, operates in compliance with all laws and regulations, and ensures that the company operates in accordance with its mission, vision, values as outlined below.

### MISSION

We exist to save lives, instill hope, and restore relationships

### VISION

We will pioneer a local and affordable medical treatment model that transforms the individuals, families and communities impacted by the disease of addiction.

### CORE VALUES

1. Spiritual/Relational – We treat people with kindness, compassion, dignity and respect.
2. Physical/Intellectual – We use cutting-edge medicine, counseling, education, training and technology to achieve high quality of life, outcomes and growth.
3. Financial – We are strategic, responsible and generous with our resources.

### PHILOSOPHY

The substance abuse program administered in SelfRefind clinics shall be focused on achieving freedom from substance abuse addiction through a hybrid approach of medical and behavioral health therapy.

**RESPONSIBILITY:** The SelfRefind Code of Ethics generally applies to all SelfRefind personnel, contractual personnel, volunteers, contractors, and others who interact in the business operations of SelfRefind and includes ethics/areas that address:

- Business
- Marketing
- Contractual Relations
- Service Delivery
- Professional Responsibilities
- Human Resources
- Prohibition of Waste, Fraud, Abuse and Other wrongdoing
- Procedures to deal with allegations of Violations of Ethical Codes
- Education on Ethical Codes for Personnel and Other Stakeholders
- Advocacy Efforts for the Persons served

- Corporate Citizenship

## 1. **Business**

SelfRefind personnel shall adhere to the highest legal and ethical standards applicable in our business. Business shall be conducted in the strict observance of all applicable laws and the integrity of each employee is of utmost importance. SelfRefind's reputation for integrity is its most valuable asset and is directly related to the conduct of its officers and other employees. Therefore, employees must never use their positions with SelfRefind for private gain, to advance personal interests, or to obtain favors or benefits for themselves, members of their families, any other individuals, corporations or business entities.

- A. Employees shall conduct their personal affairs in such a fashion that their duties and responsibilities to SelfRefind are not jeopardized and/or legal questions do not arise with respect to their association or work with the SelfRefind.
- B. Employees shall not engage in conduct or activity that may raise questions as to the company's honesty, impartiality or reputation or otherwise cause embarrassment to the company
- C. Employees shall behave in a manner that demonstrates dignity and respect to personnel, persons served, visitors, volunteers, and other stakeholders avoiding any action, whether or not specifically prohibited in the personnel policies, which might result in or reasonably be expected to create an appearance of:
  - Using position for private gain
  - Giving preferential treatment to any person or entity
  - Losing impartiality
  - Adversely affecting the confidence of the public in the integrity of the company

## 2. **Marketing** - SelfRefind Marketing Materials shall be truthful in all forms of professional and organizational communication, and avoid disseminating information that is false, misleading or deceptive.

- A. SelfRefind Marketing efforts shall not mislead the public or misrepresent the company.
- B. All Marketing information shall be cleared through the Vice President of Marketing.
- C. Employees shall not use SelfRefind's business practices, marketing strategies, or service delivery protocols for personal or professional gains outside of their specific employee role within SelfRefind.
- D. Employees may not represent or act as a spokesperson for SelfRefind unless previously authorized by the CEO/President or Vice President of Marketing.

## 3. **Contractual Relations** - SelfRefind may contract with an individual or firm to perform specific tasks at an hourly rate or project cost. Individuals under contract are not considered employees of the company, and proper credentials and proof of insurance, as appropriate, are required. The company may request verification of licensure, certification or accreditation, and/or insurance coverage. Contractual agreements must be approved by the CEO/President.

The relationship of a contractor to SelfRefind is that of an independent contractor and no benefits, whether fringe benefits or other types of benefits, will be provided as a result of the contractual agreement.

Employees working with an independent contractor of SelfRefind are encouraged to report any suspected abuse, neglect, waste, or wrongdoing by the independent contractor to their supervisor, another Manager, and/or the Corporate Compliance Officer.

- A. The president (or designee) will review proposed relationships before entering a contractual agreement with a provider of services.
- B. Proposed contracts are approved or rejected with consideration given to the bid practice and the potential for conflict of interest.
- C. The relationship of the company and its personnel to other providers and payors is also reviewed as appropriate.

**4. Service Delivery** – SelfRefind Personnel have an obligation to observe and follow policies, uphold the mission and philosophy of the company, and to maintain proper standards of conduct at all times. If an individual’s behavior interferes with the orderly and efficient operation of any department, corrective disciplinary measures, up to and including termination will be taken.

**A. Conflicts of interest** – SelfRefind is aware that the potential for conflict of interest exists for decision makers at all levels including the Leadership Team, Governing Board, administration, medical personnel, and all other personnel. It is company policy to request the disclosure of potential conflicts of interest so that appropriate action may be taken to endure that such conflict does not inappropriately influence decisions. The Leadership Team, President/designee and the medical director (when indicated) will review potential conflicts and take appropriate action. In the event of a potential conflict of interest has a direct implication for patient care, any administrative officer may request an ethics committee formation to assist in the resolution of the issue.

- Employees shall be alert to, and avoid, conflicts of interest that interfere with the exercise of professional discretion and impartial judgment.
- Employees should inform persons served when a real, or potential, conflict of interest arises, and take reasonable steps to resolve the issue in a manner that makes the persons’ served interest primary and protects the persons’ served interest to the greatest extent possible

**B. Exchange of Gifts, Money, or Gratuities**

- SelfRefind Personnel are prohibited from soliciting tips, personal gratuities or gifts from patients, clients or another individual associated with SelfRefind Business.
- SelfRefind Personnel shall not accept gifts, favors, services, entertainment or other things of value to the extent that decision-making or actions affecting SelfRefind are influenced or could appear to others to be influenced.

- The offer or giving of money, services or other things of value with the expectation of influencing the judgment or decision-making process of any purchaser, supplier, customer, government official or other person by SelfRefind is strictly prohibited
  - C. Personal fundraising** – Employees shall not engage in fundraising activities during work hours that are not sanctioned and approved by the CEO/President as permissible fundraising activities. Examples of fundraising activities that would not be under the domain of the organization may include: the selling of cookies, candy, tickets, or other items that are personal initiatives of an employee and/or his or her family member.
  - D. Personal property** - SelfRefind is not responsible for personal property that is not safeguarded or is left unattended. All personnel shall respect and safeguard the personal property of clients, visitors, and other personnel as well as the property of SelfRefind. Employees will not use or allow the use of SelfRefind property or equipment for other than activities approved by the company. Theft and destruction of property may be addressed through treatment planning (clients), disciplinary action (personnel), and/or by contacting law enforcement, as appropriate.
  - E. Setting Boundaries** – Employees are prohibited from providing services to individuals, client’s family or friends with whom they have a personal, including dating, intimate, prior or current intimate relationship. If by *unforeseen circumstances* you find yourself in this situation you should immediately contact your supervisor or Human Resources for guidance in appropriately handling the situation.
  - F. Witnessing of documents** - Personnel shall not act as a witness to documents such as Power of Attorney, guardianship, advance directives, and/or agency contracts without the expressed written approval of the President/designee. Personnel are authorized to countersign documents such as intake forms, authorizations (i.e., release of information form), treatment plans, etc. as directly related to their job duties.
    - Employees who are certified as Notary Publics may witness documents such as Power of Attorney, guardianship, advance directives, and/or agency contracts for clients, personnel, and other stakeholders in accordance with applicable state laws. The person who witnesses a document should be neutral and have no financial or other interest involved.
5. **Professional Responsibilities** – All SelfRefind personnel shall practice within the limits of their competency as defined by training licensure, experience, and the boundaries of assigned roles within the company
- A. Employees shall provide services to clients, consumers, and citizens within their defined expertise and competence. They shall broaden their knowledge and skill by study, by further training, and through the use of supervision and consultation. Employees accurately represent their qualifications or competencies to clients, consumers, and communities served by the Board. As applicable, licenses are posted according to state law
6. **Human Resources** – The functions of SelfRefind’s Human Resources shall be carried out in accordance with company policy and procedures and state and federal employment laws for

all employees regardless of race, color, sex, national origin, age, marital status, religion, disability or other protected class and at all levels of the organization. SelfRefind's Human Resource Practices will:

- A. Support fair and equitable treatment of all employees and administer all company policies and procedures, regardless of an employee's status or level in the organization. In disciplinary actions, compliance issues or grievances, Human Resources will conduct thorough investigations and make recommendations and decisions based on facts without favoritism.
  - B. Adhere to the strictest code of ethics and integrity in all employee interactions and model the highest level of ethical behavior.
  - C. Protect all employee and company information in the strictest confidence protecting the integrity of company proprietary information when dealing with employees or individuals outside the company.
  - D. Be honest in dealings with representatives of state and federal government entities and make sure the company is in compliance.
  - E. Keep abreast of changes in employment law, company policies, employment issues, and required continuing education to remain experts in the field.
- 7. Prohibition of waste, fraud, abuse, other wrongdoing** – SelfRefind personnel, consultants, volunteers, and other stakeholders may not participate in fraud, abuse, waste of resources, or other wrong doing. Ethical violations or legal but unethical wrongdoings including but not limited to fraud, waste or abuse are subject to disciplinary action up to and including termination. Employees are encouraged to report any suspicion or evidence of waste, fraud, abuse, or other wrongdoings. There will be no reprisals or retaliation permitted or accepted if any personnel, consultants, volunteers, or other stakeholders report suspicion or evidence of waste, fraud, abuse, or wrong doings.

## Corporate Compliance

### Written Procedures to Deal with Allegations of Violations of Ethical Codes

Employees have the responsibility to ask questions, seek guidance, report suspected violations, and express concerns regarding compliance with suspected violations by employees of applicable law, rules, regulations, and/or the information in this document. Employees have the same reporting obligations for actual or suspected violations committed by contractual personnel, volunteers, contractors, and others who interact in the business operations of SelfRefind.

SelfRefind will educate employees of policies and procedures regarding ethical business conduct and assist them in resolving questions and in reporting suspected violations. Retaliation against employees who use these reporting mechanisms to raise genuine concerns will not be tolerated.

The Corporate Leadership Team in collaboration with all Directors and Managers are responsible for providing policy guidance and issuing procedures to assist employees in complying with SelfRefind expectations of ethical business conduct and uncompromising values. This policy constitutes the standards of ethical business conduct required of all employees.

SelfRefind's Corporate Compliance Committee (CCC) is comprised minimally of the Corporate Compliance Officer, Vice President of Operations, and the Vice President of Finance/Administration (or designee) and is chaired by the Corporate Compliance Officer. This committee will receive all Incident Reports containing violations of the Code of Ethics. The committee will receive the report, conduct the investigation, record the investigation, and provide feedback and follow up, as may be appropriate. SelfRefind shall uphold a "no reprisal" approach for employees and volunteers in reporting suspected incidents of questionable activities and practices within the company. A "no reprisal" approach simply means that employees shall not be subject to any retaliation, penalties, discrimination, confrontation, or any other type of consequences for making a report.

- 1. Reporting Internally** - Personnel may report a violation of the Code of Ethics verbally to the Corporate Compliance Officer, Paula Walls. However, an Incident Report must be completed and submitted to employee's supervisor and the Corporate Compliance Officer. Personnel are encouraged to report the incident within 10 working days but reports will still be accepted if they are submitted more than 10 working days after the occurrence. The Corporate Compliance Committee will issue a bi-annual report to personnel and the Board of Directors on the number and types of Corporate Compliance violations.

- SelfRefind has established a compliance email address at [corporatecompliance@selfrefind.com](mailto:corporatecompliance@selfrefind.com).
- Correspondence can be sent anonymously in a sealed envelope and addressed to:  
SelfRefind Corporate Office  
Attn: Compliance Officer  
461 South 4<sup>th</sup> Street  
Danville, KY 40422

## 2. Reporting Externally for Healthcare Fraud or Abuse –

### Kentucky

- Department of Medicare Services
  - 800-372-2970
  - <http://chfs.ky.gov/dms/Program+Integrity.htm>
- Office of the Attorney General
  - 877-228-7384
  - <http://ag.ky.gov/criminal/medicaid/pages/billing.aspx>

### Ohio

- Ohio Department of Medicaid
  - 614-466-0722
  - <http://medicaid.ohio.gov/RESOURCES/HelpfulLinks/ReportingSuspectedMedicaidFraud.aspx>
- Office of the Attorney General
  - 800-282-0515
  - <http://www.ohioattorneygeneral.gov/Individuals-and-Families/Victims/Submit-a-Tip/Report-Medicaid-Fraud>

3. **Investigation** – The Corporate Compliance Committee will investigate the report within five (5) business days of receiving the report, and complete the investigation with a final report within 15 days. The CEO will facilitate and approve the recommendations of the committee which may include training, supervision, and/or disciplinary action.

4. **Acting on Violation** – If there is sufficient evidence, as determined by the investigation a report recommendation will be submitted to the CEO by the Corporate Compliance Committee. The CEO will facilitate and approve the recommendations of the committee which may include, but not limited to: corrective action strategies, training, supervision, and/or disciplinary action.

5. **Documenting the investigation** – The CCC will maintain a record of all Code of Ethics investigations and report same to the CEO/President on a bi-annual basis. In addition to maintaining a record the committee will create a separate file for the investigation that will include:

- The complaint
- The Report of Investigation

## **Monitoring and Communication of Code of Ethics**

The CCC shall ensure that the Code of Ethics is clearly communicated to personnel on an ongoing basis. The methods of communication will be as follows:

- Each new hire will receive a copy of the Code of Ethics on their first day of employment
- Each new hire will sign an acknowledgement of receipt and understanding of the Code of Ethics
- The Code of Ethics will be covered in the new employee orientation training

- The CCO will monitor trends, patterns, and code violations and recommend to the CEO/President additional training or supervision strategies to reinforce compliance with the Code of Ethics

### **Education on Ethical Codes of Conduct for Personnel and Other Stakeholders**

SelfRefind provides training and education for personnel to remain in compliance and current in their respective field in order to demonstrate strategies and interventions that are based on accepted practices and current research, evidence-based practice, peer-reviewed scientific and health-related publications, clinical practice guidelines, and/or expert professional consensus.

SelfRefind provides online access to learning opportunities and reference materials through webinars for personnel and stakeholders/collaborative partners; subscribes to magazine and subscriptions related to relevant fields; collaborates with other organizations for in-service workshops and community meetings; and supports time off and financial assistance for personnel to attend conferences.

The Corporate Compliance Officer remains current on policies and practices in the field via online training documents and printed publications/books.

### **Advocacy**

SelfRefind advocates for persons served, personnel, and other community stakeholders. SelfRefind's advocacy efforts include conducting and participating in public education or activities that promote the elimination of discrimination and stigma for the persons served.

SelfRefind personnel participate in a variety of public education efforts, community boards and committees, newspaper articles, radio, and social media.

SelfRefind's advocacy efforts also include providing testimony, and developing and submitting position statements that support the needs of persons served and/or the needs for policy revisions at the local, state, and federal levels. SelfRefind works in collaboration with other organizations to coordinate advocacy efforts on behalf of not only persons served, but for the general geographic service area as well.

SelfRefind will continue to demonstrate a commitment and value for advocacy services on behalf of persons served through a number of venues, including the recipient rights process, corporate responsibility strategies, and as a part of ongoing service delivery.

The continuum of advocacy services will include from time to time, based upon the changing needs of persons served and the community, the following:

- Linking persons served to local advocacy groups, agencies, and organizations
- Personal Advocacy: One-on-one advocacy to secure the rights of the persons served.
- Systems Advocacy: Seeking to change a policy or practice that affects the person served.
- Legislative Advocacy as permitted by law: Seeking legislative enactments that would enhance the rights of and/or opportunities for the person served.



- Legal Advocacy: Using the judicial and quasi-judicial systems to protect the rights of the person served.
- Self-Advocacy: Enabling the person served to advocate on his/her own behalf.

### **Corporate Citizenship**

SelfRefind encourages corporate responsibility at all levels of the organization. Corporate responsibility demonstrates what the organization stands for including ethical, social, and environmental values. It involves creating, communicating, and balancing value for all stakeholders. Corporate responsibility assists in: advocating for the persons served; promoting ethical business practices; developing efficiency as an organization; and considering the impact of organizational activities on persons served, personnel, other stakeholders, and the environment.

The participation of personnel in corporate responsibility activities requires communicating with the CEO/President and receiving approval for corporate responsibility activities that must be conducted during the course of the regular work day. SelfRefind provides reasonable accommodations to promote equal opportunities for participation throughout all levels of the organization.

- SelfRefind's corporate responsibility expands out into the communities served as its personnel volunteer to support the needs and activities of persons served during after-work hours.
- SelfRefind's leadership serves on community Boards, Commissions, Ad-Hoc Committees, and Task Force Groups at the federal, state and local levels.
- SelfRefind supports the involvement of personnel in corporate responsibility activities as a way to not only advance the mission, philosophy, values and goals of the organization, but to advocate for the needs, wants, and desires of persons served and the community.
- SelfRefind's corporate responsibility is also evident through consultation with community-based organizations, and governmental, public and private organizations.
- SelfRefind provides education and consultation to organizations experiencing challenges in their business practices and/or services to persons served.
- The leadership of SelfRefind serves in state and local advocacy and network groups to improve funding, policies, and services to the groups/families in our community that are affected by disease of addiction.