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# Code of Conduct

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UNITY HOUSE OF TROY, INC.

## APPLICABILITY

This Code of Conduct will be distributed to all Unity House of Troy, Inc. (Unity House) stakeholders including board members, officers, managers, employees, and other agents as appropriate. Individuals who receive the Code of Conduct will be asked to sign an Acknowledgement of Receipt and Understanding indicating their adherence to it, and a copy of the signed acknowledgement will be kept on file with the agency.

## MISSION

Unity House is dedicated to enhancing the quality of life for people living in poverty, adults with mental illness, victims of domestic violence, children with developmental delays and their families, people living with HIV/AIDS, and others whose needs can effectively be met by Unity House services and philosophy. Unity House provides direct service and works toward social justice. We help individuals identify their strengths and needs, draw upon their abilities, and access community resources. We educate, collaborate with others and advocate to influence public policy and to create awareness of the people we serve and the issues they face.

## VISION

We will serve and empower people in need. We will achieve the highest quality services through wise stewardship and a caring staff. We will transform our services in response to the changing needs of the community. We will guide our future by our compassionate past.

## SERVICE PHILOSOPHY

Unity House pursues its mission guided by the following beliefs:

People have the ability to help themselves and direct the course of their lives. Therefore, we provide information, resources, encouragement and support as people strive toward their potential.

People are responsible for their lives and the choices they make. Therefore, we help people make more informed choices.

People are less likely to have problems occur, persist or increase if they have adequate resources and strategies. Therefore, we help people access resources and develop strategies to decrease the impact and recurrence of their problems.

People have the greatest opportunity for positive change with effective services and optimal service delivery methods. Therefore, we continuously aim to refine our services, satisfy our consumers and fulfill commitments to our supporters.

People are more apt to change if their physical, emotional and spiritual needs are met. Therefore, we look beyond the presenting problem and are sensitive to the complete person.

## CODE OF CONDUCT OVERVIEW

Unity House's Compliance Program forms the foundation of the agency's overall compliance efforts. The Compliance Program provides a framework and support for the agency's continued compliance with all applicable laws, rules, regulations, and contractual obligations that govern our operations and the provision of services. The Compliance Program is designed to:

- Prevent and detect unethical and/or noncompliant behavior
- Respond to compliance issues and violations appropriately and swiftly
- Encourage good faith reporting of potential compliance issues
- Protect whistleblowers
- Firmly and fairly discipline individuals, regardless of their status, who:
  - Violate the Compliance Program's Plan, Code of Conduct, or policies and procedures and/or federal or state law or regulation
  - Encourage, direct, facilitate, or permit non-compliant behavior,
  - Fail to report or disclose a violation,
  - Fail to assist in investigations, and/or

- Commit or condone any acts of retaliation or intimidation.
- Take appropriate corrective action.

Unity House is committed to providing high quality services to the community while observing the highest standards of professional, clinical, legal, and business ethics and compliance with applicable law. Unity House is committed to treating all clients with dignity and respect and providing compassionate, trauma-informed, person-centered services that are empowering and responsive to the individual's needs. Unity House is committed to protecting our clients' confidentiality and complying with all applicable privacy and security laws, including but not limited to the Health Information Portability and Accountability Act (HIPAA), the Health Information Technology for Economic and Clinical Health Act (HITECH), and the Violence Against Women Act (VAWA).

Unity House requires strict adherence to agency policy and procedure and the rules and regulations that govern our work. The agency is committed to conducting business with professionalism, honesty, integrity, and consistency, including but not limited to documentation practices, Medicaid and other billing, and expending federal funds properly.

This Code of Conduct is a formal statement of Unity House's commitment to compliance with the law and the standards and rules of ethical conduct. It is Unity House's expectation that all stakeholders function with honesty and integrity in their work for the agency and with the people we serve, as well as with providers, regulatory bodies, internal and external auditors, vendors and all others with whom Unity House does business.

Unity House stakeholders must comply with this Code of Conduct, report any suspected compliance violations, and assist in any compliance investigations and remedial actions. Failure to do so is considered a violation of the Compliance Program and is subject to disciplinary action up to and including termination in accordance with the Discipline Policy.

Any conduct that is contrary to the expectations described throughout this Code of Conduct is a violation of the Compliance Program and its related policies and procedures. Unity House takes violations seriously. Violations will result in appropriate disciplinary action up to and including termination.

This Code of Conduct is intended to be comprehensive and easily understood. However, instances may come up that are not addressed by this Code of Conduct or our policies and procedures, or the subject matter might be complex and additional guidance may be necessary. In such instances, Unity House

stakeholders must seek direction from a supervisor or directly from the Compliance Officer. When staff seek direction on such instances from management, the manager will communicate and, when appropriate, work with the Compliance Officer to address the matter.

Furthermore, while this Code of Conduct is intended to guide you in the course of your day-to-day responsibilities, it does not replace your individual job description, the Employee Handbook, or any agency-wide or program-specific policies and procedures. Any time you are unsure whether or not an action or conduct may violate the Code of Conduct or other agency policies and procedures, please inquire with your supervisor or the Compliance Officer.

***This Code of Conduct is mandatory.***

***Your signature on the Acknowledgement of Receipt and Understanding indicates that you have received this Code, carefully reviewed it, and have agreed to adhere to the guidelines and expectations described within.***

**COMMITMENT TO STAKEHOLDERS**

Unity House is committed to our mission and to the agency’s continued success.

**To our clients,** we pledge to provide quality care through compassionate, person-centered, trauma-informed and empowering services that are delivered in a professional, ethical, accessible, timely, and cost effective manner.

**To our employees,** we pledge to maintain a work environment that is fair, dignified, and treats all members with respect, value, consistency, trust, and professionalism; that affords employees opportunities for growth and development; that encourages and values collaboration through the sharing and consideration of ideas.

**To our third party payers and other funders,** we pledge to deal with our third-party payers and other funders in a way that demonstrates our commitment to contractual obligations and reflects our shared concern for quality behavioral healthcare and other crucial services and that brings efficiency and cost effectiveness to these programs. We encourage our private third-party payers to adopt their own set of comparable ethical principles to explicitly recognize their obligations to participants as well as need for fairness in dealing with providers.

**To our regulators,** we pledge to create and maintain an environment in which compliance with rules, regulations, and sound business practices is woven into the corporate culture. We embrace the responsibility to aggressively self-govern and monitor adherence to the requirements set forth by law as well as by our Compliance Program.

**To the communities we serve,** we pledge to identify and work to respond to the needs of the communities we serve and to provide the community quality, cost-effective services. We embrace our responsibility to help those in need.

**To our volunteers,** we pledge to value the voluntary assistance that helps meet the needs of our clients and their families and to acknowledge volunteer work as an integral part of Unity House's mission and core goals. We are committed to ensuring that our volunteers feel a sense of meaningfulness from their work and receive recognition for their efforts.

## **LEADERSHIP RESPONSIBILITIES**

While all those who are associated with Unity House are obligated to follow this Code, we expect our leaders to exemplify the Code's qualities, practices, and standards and to lead by example. Agency leadership must ensure that others have sufficient information, knowledge, resources, and support to comply with law, regulation, and policy as well as to resolve ethical dilemmas as they arise. They must create and nurture a culture within Unity House that promotes the highest standards of ethics and compliance and encourages and supports individuals who raise concerns. We must never sacrifice ethics and compliance in the pursuit of business objectives or personal gain.

Unity House's Board of Directors and Management Team both participate in annual Compliance Training. The Board of Directors reviews and approves the Compliance Plan, work plan, and assessments as well as the Compliance Program's agency-level policies and procedures. The Compliance Officer reports to the Chief Executive Officer and Board of Directors regularly, ensuring compliance and ethics remain priorities and compliance risk areas are identified and soundly addressed.

## **Ethics**

Unity House strives to observe all laws and regulations pertaining to its business and to conduct business with honesty and the highest degree of integrity. To accomplish this, all Unity House stakeholders must obey the laws and regulations that govern our work and act, at all times, in the best

interest of the individuals we serve and the agency.

### **CONFLICTS OF INTEREST**

Employees, managers, executives, and board members are required to act solely in the best interests of Unity House when carrying out their duties and responsibilities and must disclose activities that constitute or may create the appearance of a conflict of interest. Employees, managers, executives, and board members are prohibited from using their position with Unity House for personal benefit. For example, employees, managers, executives, and board members are prohibited from accepting gifts of more than minimal value Unity House's vendors or facilitating contracts between Unity House and companies in which they have financial interest.

Employees involved in procurement or other sensitive job duties are required to submit annual Conflict of Interest Disclosure form. The manager and/or the Compliance Officer will review the employee disclosures and make a determination regarding any existing conflicts and any possible resolutions.

Management, Executives and Board Members will adhere and comply with the Directors and Officers Conflict of Interest Policy. All Directors and Officers are expected to familiarize themselves with this policy. Among other things, Directors and Officers are prohibited from voting on or otherwise influencing the implementation of business arrangements between Unity House and the Director/Officer or a company in which the Director/Officer has a financial interest. Managers, Executives, and Board Members must complete the annual disclosure form and follow procedures for disclosure and resolution in accordance with the policy.

### **CONFLICTS OF INTEREST AND SOLICITATION**

Unity House employees, volunteers, and interns are prohibited from lending or borrowing money, favors, or services to or from persons served. Unity House employees, volunteers, interns, and other agents are expected to serve clients in a manner that is dignified and exemplifies the highest standards of professionalism. Favor should not be granted to any one individual; all clients should be treated equally while services are tailored to meet individual needs.

Conflicts of interest must be avoided where it may be construed that a employee or their position in a Unity House program can be used to support or enhance private business or enterprise.

Employees must disclose their personal purchases and/or uses of services or goods from vendors who

they specifically make business decisions with and/or about, as a representative of Unity House. If an employee chooses to personally use the services or purchase goods from a vendor who they have the authority of doing business with as a Unity House representative, disclosure of this relationship to the Chief Executive Officer is required.

#### **INTEGRITY OF DECISIONS**

Staff has a duty to assure that the decisions made about service, treatment or care for persons and families served are based on individual and holistic assessments of needs. Staff should not take unfair advantage of any professional relationship or exploit others to further their personal religious, political or business interests.

#### **ANTI-KICKBACK**

The federal Anti-Kickback Statute prohibits the knowing and willful offer, payment, solicitation, or receipt of any remuneration, in cash or in kind, to induce or in exchange for referrals of services or items for which payment may be made under a Federal health care program. Remuneration means anything of value and can include cash, gifts, deals (such as lower costs on a good or service in exchange for the referral), or payments in excess of the fair market value of the service provided. Compliance with the Anti-Kickback Statute is a condition of payment in Federal health care programs. Penalties for violations include imprisonment, criminal fines, civil monetary penalties, and exclusion from government health care programs. A similar New York law prohibits the exchange of remuneration for referrals for items or services covered by the State's Medicaid program.

Unity House prohibits employees or contractors from knowingly and willfully soliciting, receiving, offering, or paying anything of value to another person in return for the referral of a service recipient, or in return for the purchasing, leasing, ordering, or arranging for any item or service reimbursed by a federal health care program such as Medicaid or Medicare or other government-funded program. If an employee, contractor, or vendor is solicited or offered an inducement for referrals, they must immediately report it to a supervisor or directly to Unity House's Compliance Officer.

Violation of this policy is subject to the Disciplinary Policy and will result in disciplinary action up to and including termination. Unity House also reserves the right to pursue other legal remedies available to them by law.

## REFERRALS

In accordance with ethical and legal standards, Unity House will not pay for referrals. Admissions to services are based solely on individual needs, Unity House's ability to offer appropriate services, and admission criteria will be strictly and consistently followed. Violation of this precept could have significant ramifications for Unity House, including civil and criminal penalties and possible exclusion from participation in federally funded programs. Additionally, Unity House and its employees and agents are prohibited from accepting payment or other consideration from another provider of services for referring applicants or in making payment for referrals to the agency. No one acting on behalf of Unity House is permitted to solicit or receive anything of value, directly or indirectly, in exchange for referral of individuals. The volume or value of referrals that providers have made (or may make) to us will not be a factor in admissions.

Staff is prohibited from steering or directing referrals of applicants or persons served to a private practice in which professional personnel, consultants, or their immediate families may be engaged. While family members of personnel and consultants who are in private practice may be placed on a referral list, staff are prohibited from actively directing persons and families served to the practices of these individuals. Staff are prohibited from steering or directing referrals elsewhere or giving preference to persons who are easier or less costly to serve for the agency or its practitioners. Service referrals must be made in the best interest of the client, not a staff person or their family members or personal/professional associates.

## GIFT GIVING

Unity House staff shall not receive any gifts of more than minimal value. This includes gifts in the form of money, performing service, loan, travel, entertainment, hospitality, things of promise or in any other form, under any circumstances, in which it could be reasonably inferred that the gift was intended to either influence the recipient into giving special consideration in the performance of official duties or as an award for actions of Unity House are also unacceptable. When a gift with a value of under \$50 is accepted, the supervisor must be notified (see notification procedure below). In addition, gestures of appreciation by clients to staff should always be discussed with a supervisor. All employees who are offered a gift from a supplier, contractor, client and their families, potential employees, vendors, or any other individual or organization of more than minimal value must return said gift to the donor. If it is not feasible to return it, the gift must then be utilized for the benefit of a client or program. Examples of

such gifts may include: baskets of fruits, food, candies, etc. that may arrive during the holidays, at other times of the year when gift giving is traditional, or for otherwise special occasions. Such gifts must be disclosed to the Service Director and made available to the entire staff or clients to enjoy.

The following criteria may be helpful in determining whether the gift or the personal use of a Unity House vendor is acceptable or not:

Does acceptance of the gift or the personal use of a Unity House vendor have the potential to influence business decisions such as the:

- Awarding of contracts?
- Hiring, promotion, or assignment of employees?
- Purchase of goods and services?
- Authorization or monitoring of services to consumers?
- Approvals of invoices or timesheets?
- Present the appearance of impropriety?

If the answer to any of these considerations is “yes,” a conflict of interest may exist, and the employee should be advised to return the gift, not use the vendor, and/or notify the Service Director. The above criteria are a starting point and not an exhaustive list; if you are unsure whether or not you can accept a gift or personally use a vendor, please contact the Compliance Officer for assistance.

#### **NOTIFICATION PROCEDURE**

All employees shall immediately notify their Supervisor upon receipt of a gift, regardless of value, so that a determination may be made to whom disclosure is required.

- If the Service Director determines that the value of the gift is of minimal value, the employee may keep the gift.
- If the Service Director determines that the gift has a value of more than minimal value, it either must be returned or utilized for the benefit of a client(s) or the program.

Employees who fail to comply with the notification procedure may be subject to disciplinary action.

## **ILLEGAL BEHAVIORS**

Unity House staff must not accept or encourage unacceptable or illegal behaviors performed by persons served or fellow staff, including but not limited to inappropriate sexual activity, harassment, theft, use or sale of alcohol or illegal drugs.

## **STANDARDS FOR CONDUCTING BUSINESS**

Unity House is committed to conducting all of its operations and services with honesty and integrity. Personnel are expected to act in a manner that promotes the reputation of Unity House as an agency that provides high quality services, meets and exceeds the requirements set forth by law, and operates in accordance with sound business practices and the highest standards of ethics and professionalism.

### **DISHONESTY, FRAUD, AND DECEPTION**

Staff shall not participate in, condone, or be associated with dishonesty, fraud, or deception. Unity House staff may not engage in illegal activity. Staff must also recognize their responsibility to seek change in those requirements that are contrary to the best interests of the person served, while also complying with current law. Unity House staff must never exploit the vulnerability of the persons whom they serve for personal or financial gratification, gain, or benefit.

### **SARBANES-OXLEY**

Unity House is committed to maintaining corporate honesty in all facets of its business, including in its financial report practices. To that end, any employee who has knowledge of, or questions the integrity of, any Unity House financial reporting or accounting procedure (including internal auditing controls or other auditing matters) must report such conduct to the Compliance Officer (please see contact information on the last page of this document).

All employee reports concerning questionable accounting, auditing or other financial matters may be made anonymously confidentially via the Compliance Hotline. Unity House shall not retaliate against any employee in the terms and conditions of his or her employment for reporting any financial or accounting wrongdoing or for participating in any investigation resulting from such a report.

### **FALSE CLAIMS POLICY**

Unity House requires billing activities to be performed with integrity and professionalism and in a manner consistent with the regulations of third party payers, including Medicaid and government funders, as well as other applicable federal and state regulations. Unity House has internal controls in place and conducts regular auditing and monitoring as part of its efforts to prevent and detect fraud, waste, and abuse or other negligent billing practices. Additionally, Unity House requires all employees, contractors, and agents to share in the responsibility of preventing, detecting, and reporting of suspected incidents of fraud, waste, and abuse.

Employees, contractors, or agents who reasonably suspect or are aware of the preparation or submission of a false claim, report, or any other potential incident of fraud, waste, or abuse related to a government funded program (such as a healthcare or grant program) are required to report such information to Unity House's via their supervisor or other manager (to the extent they are not involved), the Compliance Officer, or by submitting a report through Unity House's Compliance Hotline. Information on how to make a report is included on the last page of this document.

Unity House's Compliance Officer or her designee will investigate all allegations or suspicions of fraud, waste, and abuse and other potential misconduct or wrongdoing swiftly and thoroughly in accordance with agency policy and applicable law. All employees, contractors, and agents are required to assist in investigations as needed. Unity House will make every effort to correct and prevent any wrongdoing.

Failure to report, disclose, and/or assist in an investigation of fraud, waste, and/or abuse is a breach of the employee, contractor, or agent's obligation to Unity House and may result in disciplinary action up to and including termination.

In accordance with the Non-Intimidation and Non-Retaliation Policy and applicable law, Unity House will not retaliate against employees who, in good faith, bring forth claims of suspected fraud, waste, and/or abuse. Any employee who commits or condones any form of intimidation or retaliation will be subject to disciplinary action up to and including termination.

Please see the Compliance Program's False Claims Policy and Procedure for additional information.

## BILLING FOR HEALTHCARE AND OTHER GOVERNMENT-FUNDED SERVICES

All Unity House staff involved with billing practices must comply with the applicable laws, rules, procedures and practices, requirements and issued guidance of regulatory and funding agencies.

The submission of accurate bills to government payers is one of Unity House's key legal obligations. This includes the submission of billing to government programs such as Medicaid and grant programs that reimburse Unity House for the provision of services or goods.

Among other things, Unity House personnel are prohibited from:

- Billing for clients who have not been served.
- Billing for the same service twice.
- Billing at a rate in excess of the rate permitted under the applicable program.
- Billing for services that the employee knows are also being billed to the government by another health care provider.
- Billing the Medicaid program as the primary payer when the service recipient has other public or private health insurance coverage.

It is critical that all services rendered to clients are appropriately documented pursuant to each program's system for documentation. Documentation is necessary to ensure that Unity House can effectively demonstrate that it has delivered services for which it has billed in the event of a government audit or investigation.

Unity House complies with all rules governing the billing process. All personnel responsible for documenting or billing health care or other government-funded services must familiarize themselves with these billing rules.

The failure of Unity House personnel, affiliates, and/or other agents to adhere to all applicable billing rules may subject Unity House to substantial liability. Among other things, it is a violation of the Federal False Claims Act to knowingly submit a false or fraudulent claim for payment to a federal program such as Medicaid or Medicare. Unity House may be subjected to treble damages (i.e., three times the amount of the false claims) and civil monetary penalties of up to \$21,563 per claim under the False Claims Act. Other state and federal laws may also apply and impose civil and criminal penalties on the agency and

its personnel for improper billing activity.

If Unity House retains a vendor to submit bills on its behalf, Unity House may still be responsible for improper billing activity by the vendor. Accordingly, personnel involved in delegating this function must provide clear direction to vendors on proper billing procedures and carefully monitor their performance.

#### **FALSIFICATION OF DOCUMENTATION**

The integrity of the case record and the sanctity of original documentation is core to human services and to Unity House's commitment to best practices. The following documentation standards should be observed:

##### **Documentation must be original.**

- Documentation includes anything that you have written or entered into a database or other tracking system and either appears in the record or represents your work on behalf of the agency. It may include but is not limited to progress notes, contact notes, chart notes, written narratives, summaries, or reports. It may also include personal activity reports and billing logs.
- Original means that it was written or entered by hand of the person claiming to be the author. Using a copier or the computer's cut and paste function to replicate documentation is unacceptable and can be viewed as fraudulent, in spite of any honest intention. Documentation must be specific to the event, client, and date.
- Signatures submitted are original and signed by the person whose signature is represented. Whether it is your own signature, the signature of a client, their parent(s) or legal guardian, an advocate or another party, the signature must be original and must be signed by the hand of the person whose name appears. If you are unable to obtain a required original signature, speak to your supervisor. Using a copier or other means of replicating a signature will be viewed as fraudulent, in spite of any honest intention.
- Dates must be accurate. Actual event dates should not be confused with the dates on which documentation is written and the dates on which documentation is signed.

##### **Altering Documentation**

- Documentation may only be altered by a single line through the passage being altered with the initials of the person who is altering the documentation and the date on which it was altered. Unity House does not tolerate any form of falsification. If you are found to be falsifying

documentation or requesting that another falsifies documentation, disciplinary action up to and including termination may result. Unity House encourages good faith reporting and will not retaliate against reporters. If you want to make an anonymous report, please take advantage of Unity House's Compliance Hotline – contact info on the last page of this document.

## **COST REPORTS**

Unity House receives reimbursement under government programs that require the submission of cost reports. Laws, regulations, and requirements define allowable costs and outline methodologies to claim reimbursement for the cost of services. Unity House's cost reports will comply with applicable federal and state laws and funding source requirements. Given their complexity, all issues related to completion and settlement of cost reports must be coordinated with the Director of Finance or his/her designee. At no time will Unity House misrepresent rates or costs to improperly inflate reimbursement.

## **REGULATORY REQUIREMENTS**

Services will be provided pursuant to appropriate Federal, State, and local laws and regulations, and funding source requirements. Such requirements may include, but are not limited to, licenses, permits, access to services, consent to services, individual service record keeping, access to individual records and confidentiality, individuals' rights, and Medicaid regulations. Unity House is subject to numerous other laws, regulations and funding source requirements. Unity House will comply with all applicable laws, regulations and requirements. Written policies and procedures have been established to assure compliance, and ongoing education and training are provided to affected individuals on proper business conduct. Employees and other agents must be knowledgeable about and compliant with all relevant laws, regulations, and requirements, and should immediately report violations or suspected violations to a supervisor or other member of management, the Compliance Officer, or the Compliance Hotline.

Unity House will provide appropriate, complete, factual, and accurate information in response to billing inquiries. Unity House will cooperate with and be respectful of all government monitors and auditors and provide the monitor/auditor with the information to which they are entitled during a monitoring visit or audit. During a monitoring visit or audit, individuals must never conceal, destroy, or alter any documents, lie, or make misleading statements to the monitor/auditor. No one shall cause or attempt to cause another individual to fail to provide accurate information or obstruct, mislead, or delay the communication of information on records relating to a possible violation of law, regulation, requirement, and/or policy. To ensure Unity House meets all regulatory obligations, all affected

individuals must be informed about areas of potential compliance concern. Unity House is committed to diligently researching and reviewing resources that identify areas of regulatory concern, communicating those areas of concern to affected individuals, and maintaining systems that proactively address such concerns. Unity House will provide affected individuals with information, education, and training to assist them in fully complying with all applicable laws, regulations, and requirements.

#### **USING AGENCY RESOURCES IN ACCORDANCE WITH CHARITABLE BUSINESS RULES**

Unity House is tax-exempt under Section 501(c)(3) of the Internal Revenue Code. This status generally requires Unity House to engage in only those activities that are within its approved charitable purpose. The primary charitable purpose of Unity House is the provision of human and health services to its clients. Personnel may not use Unity House resources to engage in any business activity, even if for the benefit of the agency, that is outside the scope of the agency's charitable purpose without the express, written approval of the Chief Executive Officer.

#### **USING AGENCY RESOURCES APPROPRIATELY**

Personnel may use Unity House's resources solely for the purpose of carrying out their job responsibilities. Unity House facilities, equipment, staff, and other assets may not be used by an employee for personal benefit or to engage in any outside business or volunteer activity without the prior approval of the supervisor. This also includes concepts, business plans and strategies, information about people served, financial information, computer property rights, and other business information about Unity House. Personnel may not use their affiliation with Unity House to promote any business, charity, or political cause. Personnel shall seek reimbursement for expenses only to the extent such expenses have been incurred in the course of carrying out their job duties and in accordance with Unity House expense reimbursement policies.

#### **CARE AND RIGHTS OF THE INDIVIDUALS WE SERVE AND EMPLOY**

Since its inception more than 40 years ago, Unity House has listened to the most vulnerable members of our community and built programs and designed services to meet their diverse range of needs - from the most exigent needs of food and shelter to providing the tools and opportunities needed to establish and maintain interdependence with the community.

Unity House is committed to providing high quality services that are professional, ethical, compassionate, timely, accessible and appropriate. It is the duty of every Unity House employee and other agent to ensure that our clients are provided with appropriate, individualized services that promote empowerment and involvement in their own care, preserve autonomy and civil rights, are trauma-informed and strengths-based, and are delivered in a manner that is dignified. All clients will be treated with professionalism, dignity, and respect. Employees will participate in required training in order to understand their role in service provision.

Clients or their legal custodians are provided with information and explanation of services including, but not limited to, diagnosis, service plan, right to refuse or accept services, service decision dilemmas, costs, explanations of service options and service alternatives. Clients or their legal guardians have a right to decline services and will be given appropriate information to make an informed decision. Clients and their representatives are accorded and will receive appropriate confidentiality, privacy, security and protective services, and opportunity for resolution of complaints. Clients have the right to refuse services.

Unity House prioritizes our clients' safety and privacy, and employees and other agents are required to understand and adhere to the policies and procedures in place to protect our clients.

#### CLIENT CONFIDENTIALITY

Unity House is committed to safeguarding our clients' personal and health records. All client records must be kept confidential in accordance with applicable privacy laws and regulations. Unity House is subject to the Health Insurance Portability and Accountability Act (HIPAA) that limits the use and disclosure of protected health information; Health Information Technology for Economic and Clinical Health Act (HITECH) that promotes the adoption and meaningful use of health information technology, and the Violence Against Women Act (VAWA) that contains strong confidentiality provisions that limit the sharing of victims' personally identifying information. Unity House must also comply with other confidentiality laws governing child welfare, mental health, developmental disabilities, etc., and HIV-related information.

Unity House has adopted a comprehensive set of policies governing the use and disclosure of client records. All personnel who have access to such records must familiarize themselves with the program's policies and procedures, and adhere to their terms. Anyone found to engage in any activity which

violates client confidentiality and privacy will be subject to discipline, in accordance with Unity House's policies and procedures. Unity House will not tolerate the violation of client confidentiality and privacy.

#### **INFORMED CONSENT**

Staff have a duty to be knowledgeable about consents, the methods and manner of obtaining consents, and to use clear and understandable language to inform clients served of their rights. Staff have a duty to be familiar with protecting, promoting, and safeguarding the rights of clients and families being served. Staff must enlist the full participation of clients and families served in decision-making about their service, care, or treatment. Informed consent is particularly important in the area of psychotropic medications and matters of safety.

#### **PROVIDING ACCESS TO APPROPRIATE SERVICES**

Unity House is committed to ensuring that all clients under its care receive prompt access to the full range of appropriate services to which the client is entitled under the applicable program. All behavioral health and education services must be ordered and/or delivered by appropriately licensed or qualified personnel. Other government-funded services are provided subject to eligibility requirements and availability and in accordance with applicable policy.

Unity House seeks to provide or arrange for quality care at all times. Under certain government programs, Unity House may receive a fixed per diem rate that covers a specified range of services that may be needed by the client. It is particularly important in these programs that personnel not restrict a client's access to necessary health care or social services to which the service recipient is legally entitled. Any such restrictions are not only unethical, but they may also be subject to liability under the False Claims Act and other laws.

#### **ENSURING EQUAL OPPORTUNITY FOR ALL CLIENTS, EMPLOYEES, AND AGENTS**

Unity House is committed to serving all clients on an equal basis without regard to race, color, national origin, creed, sex, religion, disability, age, marital status, veteran status, gender identity, sexual orientation, or any other personal characteristic protected by law. Discrimination on these grounds is also prohibited in connection with the hiring and treatment of employees and other agents. In addition, sexual harassment of employees or clients will not be tolerated. Unity House seeks to create an environment that fully respects the dignity of each individual. Please see the Employee Handbook for more information.

## WHISTLEBLOWERS

Unity House strictly prohibits employment-related retaliation and/or intimidation against employees, managers, executives, board members and others agents who come forward with information about reasonably suspected misconduct or questionable practices. Allegations of retaliation or intimidation should be reported to your supervisor (to the extent they are not involved), the Compliance Officer, or the Compliance Hotline, which offers anonymous and confidential reporting options. Please see pages 19-20 of the Compliance Plan for detailed information regarding how to make a report.

## RELATIONSHIPS

Employees and other agents shall seek to strengthen relationships among people in a purposeful effort to promote, restore, maintain, and enhance the well being of individuals, families, social groups, organizations and communities. Unity House employees and other agents shall deal in an honest and trustworthy manner with clients, neighbors, other providers, and their colleagues and shall follow Unity House's personnel policies and practices as expressed in the Employee Handbook.