



CODE OF CONDUCT



INDIAN CREEK FOUNDATION

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Indian Creek Foundation and the Code of Conduct

Indian Creek Foundation is a non-profit organization which has serves Bucks and Montgomery County area children and adults with intellectual and developmental disabilities. Additional services are also available for individuals with a dual diagnosis of an intellectual or developmental disability, Autism Spectrum Disorder and/or a mental health challenge. As a team member of Indian Creek Foundation, you must follow our Compliance and Ethics Program and the Code of Conduct. Team members include individuals who provide care and service throughout the organization as well as those who support our work through contracts and other agreements. Providers of services must follow many rules and regulations from both the state and federal governments.

This Code of Conduct will help you understand how your actions must align with this wide range of rules as a team. We can ensure that we provide the highest level of care and services and prevent fraud, waste, and abuse. Our Compliance Officer is Karla Dreisbach. The Compliance Official at Indian Creek Foundation is Amybeth Walter.

Message from the CEO

Dear Associate,

Indian Creek Foundation has a long-standing commitment to supporting children and adults with compassion, dignity, and respect. We are dedicated to enhancing the quality of life of those we serve through person-centered care, ethical practices, and a supportive community environment. Our mission and values guide the services we provide, including specialized support for individuals with intellectual or developmental disabilities and/or mental health challenges.

The healthcare and human services fields are constantly evolving and are shaped by numerous laws, regulations, and professional standards. In our commitment to maintaining a safe, respectful, and compliant workplace, we have developed a Compliance and Ethics Program that supports team members in making informed and responsible decisions. This Code of Conduct serves as the foundation of our Compliance and Ethics Program and reflects the integrity, accountability, and compassion that define our organization.

The Compliance Plan, Policies and Procedures, and Code of Conduct are designed to help ensure that our actions and decisions remain ethical and compliant with applicable laws, regulations, and organizational standards. While the Code of Conduct provides guidance, it does not replace each person's responsibility to exercise sound judgment, honesty, and fairness in every aspect of their work. It also highlights areas where improper or unethical decisions could negatively impact on the individuals we serve, our fellow team members, the organization or overall community.

We value the dedication and contributions of every team member and appreciate your commitment to fostering an ethical, respectful, and supportive environment. As part of the Indian Creek Foundation team, you play an important role in protecting the integrity of our workplace and ensuring compliance with all applicable laws and regulations.

Thank you for your commitment to our mission, values, and, most importantly, to the individuals and families we proudly serve.

Sincerely,

A handwritten signature in cursive script that reads "Tim".

Tim Barksdale, CEO,
Indian Creek Foundation

Introduction

Our **Code of Conduct** is a guide to appropriate workplace behavior. Refer to this guide whenever you are unsure of how to make the right decision(s) or how to respond to a situation. Employees and individuals all share a commitment to legal, ethical, and professional conduct in the workplace. This Code of Conduct is one of three documents that guide our work. For more detailed information, you can read the **Compliance Plan** and the **Compliance Policies and Procedures**. The Compliance Plan and Code of Conduct include the federal, state, and local laws we must follow.

Our Responsibilities

As part of our team, we each share a responsibility and commitment to our residents, their families and each other.

As part of your commitment to our team, it's important that you always make legal and ethical decisions. Additionally, if you see anyone else on the team violating the Code of Conduct, it's your responsibility to report those violations to the compliance officer.

Reporting violations of the Code of Conduct is not optional. **You must report anything you see that may be unethical, illegal, or unprofessional.** Our reporting process includes several ways for you to share any concerns you may identify.

The Reporting Process

You may always call the Compliance Line at 800-211-2713 or file a report with Amybeth Walter

- Report to a supervisor. They are most familiar with the laws, regulations, and policies that relate to your work.
- Report to a member of the leadership team, seeking out another or someone from human resources.
- Contact the Compliance Official, a member of the Compliance Committee, or the Compliance Officer.
- Call the toll-free compliance line which is available 24/7.
- Scan the QR code which links to the compliance line portal.

Compliance Hotline- 800-211-2713



All reports to the Compliance Line are confidential, and you may choose to report *ANONYMOUSLY*.

The Compliance Line is available 24 hours a day, 7 days a week, for callers to report compliance-related issues. Concerns that are reported to the Compliance Line are taken seriously. Our culture is to ensure that there is no retaliation for bringing issues forward.

You can make calls to the Compliance Line without fear of reprisal, retaliation, or punishment for your actions taken in good faith. Anyone, including a supervisor who retaliates against an individual or entity for contacting the Compliance Line or reporting a compliance issue in any other manner, will be disciplined.

Individual Rights and Person-Centered Care

The **foundation for good quality of care and quality of life** is understanding and honoring individual rights. As we provide care and services, it is important to respect individuals' rights. This includes:

- Make no distinction in the admission, transfer or discharge of an individual, or in the care/services we provide on the basis of race, gender, age, religion, national origin, disability, color, marital status, veteran status, medical condition, sexual orientation or other protected class status, insurance or financial status;
- Treat all individuals in a manner that preserves their dignity, autonomy, self-esteem and civil rights;
- Protect every individual from physical, emotional, verbal or sexual abuse or neglect;
- Protect all aspects of client privacy and confidentiality;
- Respect client's personal property and money and protect it from loss, theft, improper use and damage;
- Respect the right of individuals and their legal representatives to be informed of and participate in decisions about their care and treatment;
- Respect the right of individuals and/or their legal representatives to access their medical records as required by the Health Information

Portability and Accountability Act (HIPAA);

- Recognize that individuals have the right to consent or refuse care and the right to be informed of the medical consequences of such refusal;
- Protect individuals' rights to be free from unnecessary physical and chemical restraints;
- Provide individuals with the right to freely register complaints or make recommendations concerning their treatment and services provided by our agency and
- Respect the individuals' right to self-determination and autonomy.

If you witness any form of abuse, you must report it immediately to your supervisor.

Indian Creek Foundation will not tolerate any type of resident abuse or neglect at any time.

- Providing the individual needs, developing care plans based upon their assessed needs.
- Monitoring our services to ensure that our individuals receive quality services through Quality Assurance and Improvement.
- Assuring that our staff is qualified with appropriate licenses and experience.
- Maintaining and ensuring that our policies, procedures, and practices are current and in line with the rules and laws we need to follow.
- Completing accurate and timely documentation and billing for the services provided.

Professional Responsibilities

As an employer, we promise to follow **fair employment practices** when hiring, screening, and evaluating our employees. Federal, state, and local laws guide our employment practices and provide us with a roadmap to compliance.

To keep individuals safe, we screen all employees against various databases as required by law. As long as you work here, you must immediately tell your supervisor if any of your actions inside or outside of work might affect your employment. You must report any arrests or indictments, convictions, revocation of professional licenses, exclusions, or anything else that might prevent you from working at Indian Creek Foundation or provide services to the individuals we support.

The professional, responsible, and ethical behavior of every team member reflects directly on our reputation. As a team member, you must strive to make decisions that are honest and professional every day.

If you are a team member with a **professional license**, it's your responsibility to ensure you follow all applicable licensing, credentialing, and certification requirements and keep it current and in good standing.

We will not tolerate any form of **sexual harassment or violence** in the workplace. Additionally, team members may not supervise or be supervised by anyone with whom they have a close personal relationship.

You must follow our safety protocols that are here to protect you and the individuals, including but not limited to our emergency plans, hazardous materials, and environmental policies. Let your supervisor know of any potential hazards immediately.

Safety in the workplace includes refraining from using any substances that impair your ability to do your job. You may never use, sell, or bring alcohol, illegal drugs, and/or narcotics on our property. You may never come to work under the influence of alcohol or illegal drugs. We have the right to screen and discipline any employee suspected of violating the drug and alcohol policy.

Governance & Oversight

We are committed to ensuring our organization remains in **compliance** with all applicable federal and state laws. As a team member, you must also help our organization always remain in good standing with regard to our business practices.

During the course of your job, you may have access to confidential and proprietary information. **Proprietary information** is any information an organization creates or owns, such as policies and procedures, compensation, or marketing and advertising plans. Confidential or proprietary information should not be shared with anyone outside Indian Creek Foundation without prior permission.

Team members may not accept any **tips, gratuity, or gifts** from individuals, possible individuals or their family. Likewise, you may not give individuals gifts. Gifts include any business or professional courtesy, including entertainment.

Team members must always avoid conflicts of interest. A conflict of interest is when your personal interests may interfere with your ability to make good decisions for Indian Creek Foundation. If you are unsure if a situation or relationship is a conflict of interest, talk with your supervisor.

Throughout the course of your job, you may use our **computers systems and networks**. You have **no expectation of privacy** while using our computers systems and using them improperly or illegally is a violation of the Code of Conduct. When using your work computer to create documents, records, emails, medical records, billing records, and financial records, team members must never falsify or alter any document in an illegal or unethical way.

We use **marketing and advertising** to educate the public about our community services, activities, and opportunities. All marketing and advertising materials are truthful and informative and are designed to be honest and accurate. Team members and individuals often have **relationships** with other providers and referral sources. All relationships with these professionals must be open, honest, and legal.

We are required to follow many federal, state, and local laws, often subject to change. Management will communicate about these changes when they occur and educate employees and individuals as needed. It's your job to read these **updates**, so you always have the most up-to-date information.

We are committed to **ethical and honest billing practices**. All team members must make truthful, accurate, and complete statements and submissions for billing. We have zero tolerance for false or inaccurate coding or billing. Any team member who knowingly submits a false claim or provides information that could result in a false claim may be disciplined up to and include termination. Additionally, if you witness or suspect another employee or individual member of making false billing claims, you must report the activity to your supervisor or the compliance officer/designee.

We will take **disciplinary action** against a team member who violates this Code of Conduct, the Compliance and Ethics Program, the supporting policies and procedures, and applicable federal, state, and local laws. Disciplinary action could come in the form of termination of employment or business relationships, civil penalties, and/or criminal investigation. We may also initiate disciplinary action against any employee who **retaliates** against another employee following the Code of Conduct and applicable laws.

You are valued here. We trust you to always make ethical and honest decisions during your employment here. If ever you have a question about compliance or ethics in your decision making, please discuss the issue with your immediate supervisor or our compliance officer.

The Compliance and Ethics Program is critical to our continued success. The Code of Conduct and the Compliance and Ethics Program set standards for our legal, professional, and ethical conduct. Some key points to remember are:

- We are committed to personal and organizational integrity, acting in good faith, and being accountable for our actions.
- The Code of Conduct and the Compliance and Ethics Program help prepare us to address the complex ethical, professional, and legal responsibilities involved in providing services and support to individuals with intellectual and developmental disabilities and mental health challenges.
- The Compliance and Ethics Program is an ongoing initiative designed to foster a supportive work environment, provide standards for clinical and business conduct, and offer education and training opportunities for team members.

The success of the Compliance Program depends on our commitment to act with integrity, both personally and as an organization. As a team member, your duty is to ensure that you are doing everything practically to comply with applicable laws. You are expected to satisfy this duty by performing your responsibilities in accordance with professional standards, the regulations guiding our business practices, and our policies and procedures.

Your Compliance Official

Amybeth Walter

267-203-1500 extension 131

Your Compliance Officer

Karla Dreisbach, CHC, CHPC, CCEP

AQORD Compliance Collaborative

215-646-0720
