

# CODE OF CONDUCT

## Dominion Youth Services (DYS)

The purpose of this Code of Conduct is to provide standards by which employees, contractors, and stakeholders are expected to conduct themselves so that we may protect and promote organizational integrity and enhance our ability to achieve our mission and live our values of advocating for the people we serve, 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.

### 1. Legal Compliance

We will work towards ensuring that all activity by or on behalf of DYS complies with applicable laws, rules and regulations.

The following standards are intended to provide guidance to employees and management to assist them in their obligation to comply with applicable laws, rules and regulations. The standards are neither exclusive nor complete. Employees are expected to comply with all applicable laws, rules and regulations, whether or not specifically addressed in these policies.

All questions regarding the existence of, interpretation or application of this plan should be directed to the DYS Compliance Officer.

#### a. **Fraud, Abuse, Waste and Other Wrongdoing**

DYS expects employees to refrain from conduct which may violate fraud and abuse laws. These laws prohibit:

- Direct, indirect or disguised payments in exchange for the referral of patients
- The submission of false, fraudulent or misleading claims to any governmental entity or third party payer, including claims for services not rendered, claims which characterize the service differently than the service actually rendered, or plans which do not otherwise comply with applicable program or contractual requirements
- Making false representations to any person or entity in order to gain or retain participation in a program or to obtain payment for any service.
- Any other behavior or activity which may be construed as unlawful, fraudulent or otherwise unlawful.

#### b. **Lobbying/Political Activity**

DYS expects each of its employees to refrain from engaging in lobbying and political activities.

- No individual may make any agreement to contribute any money, property, or services of any officer or employee at DYS's expense to any political candidate, party Agency, or committee for individual in violation of any applicable law. Officers and employees may personally participate in and contribute to political agencies or campaigns, but they must do so as individuals, not as representatives of the organization, and they must use their own funds.

- Where its experience may be helpful, DYS may publicly offer recommendations concerning legislation or regulations being considered. In addition, it may analyze and take public positions on issues that are related to the operations of the organization when our experience contributes to the understanding of such issues.

DYS has many contacts and dealings with governmental bodies and officials. All such contacts and transactions shall be conducted in an honest and ethical manner. Any attempt to influence the decision-making process of governmental bodies or officials by an improper offer of any benefit is absolutely prohibited. Requests or demands by any governmental representative for any improper benefits should be immediately reported to the DYS Compliance Officer.

#### **c. Environmental**

It is the policy of DYS to manage and operate its business in a manner which respects our environment and conserves natural resources. Our employees will strive to utilize resources appropriately and efficiently, to recycle where possible and otherwise dispose of all waste in accordance with applicable laws and regulations. We will work cooperatively with the appropriate authorities to remedy any environmental contamination for which we may be responsible.

#### **d. Discrimination**

DYS believes that the fair and equitable treatment of employees and the people we serve is critical to living our mission, vision and values. It is our policy to treat our employees and the people we serve without regard to the race, color, religion, sex, ethnic origin, sexual orientation, age, socioeconomic status, or abilities of such person, or any other classification prohibited by law.

All employment actions are based on ability, achievement, skills, experience and conduct without regard to race, color, religion, sex, ethnicity, sexual orientation, age, socioeconomic status, or any other category prohibited by law.

We prohibit any form of illegal harassment or discrimination. Allegations of illegal harassment or discrimination will be promptly and thoroughly investigated in accordance with applicable laws and organizational policy.

## **2. Business Ethics**

In furtherance of our commitment to high standards of business ethics and integrity, employees are expected to accurately and honestly represent DYS in all professional situations and will not engage in any activity intended to defraud any person or organization of money, property or services.

The standards set forth below are designed to provide guidance to ensure that our business activities reflect our standards of ethics and integrity. This list is not all encompassing; other situations will be addressed as they occur.

#### **a. Honest Communication**

DYS requires candor and honesty from individuals in the performance of their duties and responsibilities. No employee shall make false or misleading statements to any individual whom we

serve or other person or entity doing business with DYS about any individual or entity doing business or competing with DYS, or about the products or services of DYS or Its competitors.

**b. Misappropriation of Proprietary Information**

DYS employees shall not misappropriate confidential or proprietary information belonging to another person or entity nor utilize any publication, documents, computer program, information or product in violation of the third party's interest in such product. All employees are responsible for ensuring they do not improperly copy for their own use documents or computer programs in violation of applicable copyright laws or licensing agreements. All employees must comply with DYS confidentiality policies. Employees shall not utilize business information obtained from competitors, including foster parent lists, contracts or other information in violation of a covenant not to compete, prior employment agreements, or any other manner likely to provide an unfair competitive advantage to DYS.

**3. Confidentiality**

DYS employees shall strive to maintain confidential information in accordance with all applicable legal and ethical standards.

DYS employees are in a position to have access to a wide variety of confidential, sensitive and proprietary information, the inappropriate release of which could be injurious to the people we serve, our business partners and the organization. Every employee of DYS has an obligation to actively protect and safeguard confidential, sensitive and proprietary information in a manner designed to prevent the unauthorized disclosure of information.

**a. Information Related to the People We Serve**

All employees have an obligation to maintain the confidentiality of information about the people we serve in accordance with all applicable laws and regulations. If questions arise regarding an obligation to maintain the confidentiality of information or the appropriateness of releasing information, employees should seek guidance from their manager or the DYS Compliance Officer.

The United States Department of Health and Human Services (HHS) has issued standards for the Privacy of Individually Identifiable Health Information (Privacy Rule) which became effective on April 14, 2003, establishing a set of national standards for the protection of health information. The Privacy Rule standards address the use and disclosure of Protected Health Information as well as standards for an individual's privacy rights to understand and control how their health information is used. The Office of Civil Rights, within HHS has the responsibility for implementing and enforcing the Health Insurance Portability and Accountability Act (HIPAA) Privacy regulations. All employees receive training related to confidentiality and HIPAA Privacy regulations prior to having access to Protected Health Information and have an obligation to follow all applicable confidentiality and HIPAA policies and procedures.

If questions arise regarding an obligation to maintain the confidentiality of information or the appropriateness of releasing information, employees should seek guidance from DYS management or the compliance officer. In addition, employees should contact management or the compliance officer if they have questions about a specific HIPAA related policy or procedure.

Employees shall also explain what type of information and with who that information is shared prior to the beginning of counselling. The mandated client has the right to refuse services and the employee shall, to the best of their ability, explain the consequences possibly imposed by the mandating authority of refusing counseling services.

At no time shall employees conduct searches using internet-based search engines and/or social media applications to gather information about clients.

#### **b. Proprietary Information**

Information, ideas and intellectual property assets of DYS are critical to our success. Information pertaining to our competitive position or business strategies, payments or reimbursement information, and information related to negotiations with employees or third parties should be protected and shared only with employees having a need to know such information in order to perform their job. Employees should exercise care to ensure that intellectual property rights, including patents, trademarks, copyrights and software is carefully maintained and managed to preserve and protect its value.

#### **c. Personnel Actions/Decisions**

The salary, benefits and other personal information relating to employees shall be treated as confidential. Personnel files, payroll information, disciplinary matters and similar information shall be maintained by human resources with limited access.

### **4. Conflicts of Interest**

The standards outlined in this section are intended as a guide for employees in determining the appropriateness of activities and behaviors within the context of our business relationships, including relationships with vendors, providers, contractors, third party payers and governmental entities. It is the intent of DYS that this policy be construed broadly to avoid even the appearance of improper activity. If there is any concern about whether specific conduct or activities are ethical or otherwise appropriate, please contact the DYS compliance officer.

Owners, officers and key employees have a particular obligation of loyalty to the organization. Persons holding such positions may not use their positions to profit personally, or to assist others from profiting in any way at the expense of the organization.

All employees are expected to manage their behavior to avoid actual impropriety and/or the appearance of impropriety which might arise from the influence of those activities on business decisions or from disclosure or private use of business affairs or plans of the organization.

#### **a. Outside Financial Interests**

While not all inclusive, the following will serve as a guide to the types of activities by an employee or a member of their household, which might create a conflict of interest with regard to financial matters:

- Ownership in or employment by any outside concern which does business with the DYS. This does not apply to stock or other investments held in a publicly held corporation, provided the value of the stock or other investments does not exceed 5% of the corporation's stock. DYS may, following a review of the relevant facts, permit ownership interests which exceed these

amounts if management concludes such ownership interests will not adversely impact the DYS's business interests or the judgment of the covered person.

- Conduct of any business not on behalf of DYS with any DYS vendor, supplier, contractor, or agency, or any of their officers or employees.
- Representation of DYS by a covered person in a transaction in which he or she or a household member has a substantial personal interest.
- Disclosure or use of confidential, special or inside information of or about DYS, particularly for personal profit or advantage of the covered person or household member.
- Competition with DYS by a covered person directly or indirectly or in the purchase, sale or ownership of property or property rights or interests or business investment opportunities.

#### **b. Services for Competitors/Vendors**

No employee shall perform or render services for any competitor of DYS or for any organization with which the DYS does business or which seeks to do business with outside of the normal course of his/her employment without the approval of the owners. Nor shall any such employee be a trustee, officer, or consultant of such an Agency, nor permitted his/her name to be used in any fashion that would tend to indicate a business connection with such agency.

#### **c. Participation on Boards of Directors/Trustees**

- Employees must attain approval from the owners prior to serving as a member of the Board of Directors/Trustees of any Agency or organization whose interests may conflict with those of DYS.
- Employees who are asked to serve on the Board of Directors/Trustees of any Agency whose interest would not impact DYS (for example, civic, most charitable, fraternal and so forth) will not be required to obtain such approval.
- A covered person must disclose all Board of Directors/Trustees activities in the annual conflict of interest disclosure statement.
- DYS retains the right to prohibit membership on any Board of Directors/Trustees where such membership might conflict with best interest of DYS.
- Questions regarding whether or not Board participation might present a conflict of interest should be discussed with a member of management or the compliance officer.

#### **d. Multiple Relationships**

A multiple relationship occurs when an employee has both a professional and personal relationship with a person or has a personal relationship with someone closely associated with someone that the employee has a professional relationship with.

We expect employees to refrain from entering into a multiple relationship if that relationship could reasonably be expected to impair the employee's objectivity, competence, or effectiveness in performing his or her job, or otherwise risks exploitation or harm to the person with whom the professional relationship exists. Multiple relationships that would not reasonably be expected to cause impairment or

risk exploitation or harm are not unethical. If an employee suspects that his or her multiple relationship could be a conflict of interest, we would ask that they resolve the conflict as quickly as possible.

**e. Gifts, Gratuities and Money**

Business transactions with vendors, contractors and other third parties shall be free from any type of solicitation of gifts and/or favors or other improper inducements in exchange for influence or assistance in transactions.

It is our desire to preserve and protect our reputation and to avoid the appearance of impropriety. As a consequence, the following guidelines apply:

- Gifts from people whom we serve - Employees are prohibited from soliciting or receiving tips, personal gratuities or gifts from people we serve and their family members.
- Gifts influencing decision-making - Employees shall not accept gifts, favors, services, entertainment or other things of value to the extent that decision-making or actions affecting the business might be influenced. Similarly, the offer of money, services or other things of value with the expectation of influencing the judgment or decision-making process of any purchaser, supplier, customer or government official is strictly prohibited.
- Gifts from existing vendors - Employees may accept gifts, meals, entertainment or other goods or services from vendors which have a nominal value. If an employee has any concern whether a gift should be accepted, they should consult with their supervisor or the DYS compliance officer.
- Vendor sponsored entertainment – Under most circumstances attendance at local theater, sporting event or similar entertainment venue may be accepted. In most circumstances, a business representative of the vendor should be in attendance with the employee.

Nothing in this policy shall prohibit a supervisor from establishing stricter rules relating to the acceptance of gifts, gratuities or other things of value from vendors.

**f. Workshops, Seminars and Training Sessions**

Attendance at local, vendor-sponsored workshops, seminars and training sessions is permitted. Out-of-town seminars, workshops or training sessions are permitted only with supervisory approval.

**g. Social Media**

All employees shall abide by the following DYS standards regarding establishing social media-based relationships with clients or client family members, and professional standards when using social media.

- They shall not engage in personal virtual (social media driven) relationships with clients or client family members.
- Employees who engage in social media driven relationship with ex-clients shall use best clinical judgment in determining whether to enter into this new relationship, and the new relationship must not be exploitative toward the ex-client.
- They shall not speak on behalf of DYS on their social media accounts

**h. Contractual Relationships**

All contracted individuals will be required to adhere to the DYS Code of Conduct, Employee Handbook, and policies and procedures outlined at time of contract agreement. Any confidentiality agreements signed by employees will remain in effect even after such time as the contract is terminated.

**5. Business Inducements**

Employees may not gain any advantage through the improper use of payments, business courtesies or other inducements. Offering, giving, soliciting or receiving any form of override or other improper payment is prohibited.

In addition, subject to management approval, employees may provide gifts, entertainment and meals of nominal value to DYS vendors, current and prospective business partners and other persons when such activities have a legitimate business purpose and are reasonable and consistent with all applicable laws. Employees are strictly prohibited from providing gifts, gratuities, or monies of any kind to DYS clients or potential clients.

**6. Protection of Assets**

All employees will strive to preserve and protect the organization's assets by making prudent and effective use of resources and properly and accurately reporting its financial condition.

The standards set forth herein are intended to guide employees by articulating the organization's expectations as they relate to activities or behaviors which may impact our financial health.

**a. Internal Control**

DYS has established control standards and procedures to ensure that assets are protected, properly used and that financial records and reports are accurate and reliable. All employees share the responsibility for maintaining and complying with required internal controls.

**b. Financial Reporting**

All financial reports, accounting records, research reports, expense accounts, and other documents must accurately and clearly represent the relevant facts or nature of the transaction.

**c. Travel and Entertainment**

Travel and entertainment expenses should be consistent with the employee's job responsibility and the organization's needs and resources. Travel, meals and entertainment transactions must be authorized in advance by the supervisor and Senior Management team defined as the Partners, Director of Finance, HR Manager and Director of Operations. Travelers must verify that planned travel is eligible for reimbursement before making travel arrangements.

As required by IRS regulations, all purchases must be properly documented. Transactions must be supported by original itemized receipts. Internet purchases require a copy of the order confirmation itemizing all costs. If the required documentation is not available, an explanation must be documented, signed by the Senior Management team and filed with an Expense Report.

In addition, all transactions must include detailed explanation that supports the business purpose in terms that would be clear to an external reviewer. It is policy that an employee should not suffer a

financial losses or financial gain as a result of business travel and entertainment. Employees are expected to exercise reasonable judgment in the use of DYS assets and to manage those assets as if they were their own.

**d. Personal use of DYS assets**

Employees are prohibited from unauthorized use of organizational equipment, supplies, materials, assets, or services. Company equipment and materials are for the benefit of DYS business only.

**7. Professional Responsibilities**

Licensed counselors, social workers, and marriage and family therapists, or those working towards licensure are expected to adhere to all relevant codes of ethical practice and professional conduct. Any violations of the rules of ethical practice and professional behavior constitute unprofessional conduct and may result in disciplinary action, up to and including termination of employment and/or reporting to the Department of Health Professions. All staff members are expected to comply with the following:

**a. Integrity**

All staff members will carry out their professional responsibilities with integrity, treating those with whom they work or have professional relationships in a dignified, respectful, honest and fair manner.

**b. Propriety**

All employees will maintain high standards of personal moral conduct when engaged in DYS business and professional activities. Personal standards and conduct are private matters except when such conduct may compromise work or professional responsibilities or reduce public confidence in the organization.

**c. Avoiding Harm**

All employees will act in the best interest of those toward whom they have professional responsibilities, to include avoiding doing harm. It is expected that employees conduct themselves in a manner not to inflict either emotional or physical harm toward any person, to include co-workers, clients (or prospective clients), family members or significant others.

**d. Non-Discrimination**

DYS employees will not engage in and will act to prevent discriminatory behaviors based on age, gender, race, ethnicity, national origin, religion, sexual orientation, disability, socioeconomic status, HIV/AIDS status, veteran's status, or any basis prescribed by law.

Where personal or cultural differences could significantly affect best practice intervention with a particular individual, family or group, employees will seek and obtain appropriate training to ensure that the intervention is unbiased, competent and culturally appropriate.

**e. Sexual Harassment**



Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when (1) submission to such conduct is made either explicitly or implicitly as a term or condition of an individual's employment (2) submission to, or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual or (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.

While it is not possible to identify each and every act that constitutes or may constitute sexual harassment, the following are some examples of sexual harassment are provided below: (a) unwelcome requests for sexual favors; (b) lewd or derogatory comments or jokes; (c) comments regarding sexual behavior or the body of another employee or client; (d) sexual innuendo and other vocal activity such as catcalls or whistles; (e) obscene letters, notes, emails, invitations, photographs, cartoons, articles, or other written or pictorial materials of a sexual natures; (f) repeated requests for dates after being informed that interest is unwelcome; (g) retaliating against an employee for refusing a sexual advance or reporting an incident of possible sexual harassment to DYS or any government agency; (h) offering or providing favors or employment benefits such as promotions, favorable evaluations, favorable assigned duties or shifts, etc., in exchange for sexual favors; and (i) any unwanted physical touching or assaults, or blocking or impeding movements.

- Employees will not engage in and will act to prevent sexual harassment.
- Employees will comply with DYS policies and procedures on sexual harassment.

#### **f. Setting Boundaries**

Employees will consider the potential harm that intimate, social or other non- professional contacts and relationships with clients, their family members, foster parents, colleagues and other employees can create. Employees should be aware that any relationships outside of a professional one could affect objectivity, judgment and performance and avoid any conduct that would lead a reasonable person to conclude that they may be biased or motivated by personal interest in the performance of their duties.

Whenever feasible, employees shall avoid professional relationships when a pre-existing non-professional relationship is present. Employees should discuss past, existing and potential dual relationship concerns with their supervisor and resolve them in a manner that avoids harming and/or exploiting affected persons.

#### **g. Personal Issues**

Employees will not perform professional activities when they know or should know that personal issues or other emotional health concerns could impede their professional judgment and performance. When such problems may affect performance, employees should inform their supervisor who will assist in determining if they should limit, suspend or terminate their duties. Employees are strongly encouraged to obtain professional help to alleviate performance issues due to personal problems.

## **h. Documentation of Professional Work**

DYS professionals should accurately and truthfully document their professional work according to company policy, licensing and/or legal requirements in order to ensure accountability and continuity in provision of services.

Employees should understand that a failure to maintain a professional standard of documentation may constitute a breach of professional ethics and result in a report to the state regulatory board and/or disciplinary action.

## **i. Consumer Self-Determination**

1. The mandated nature of Dominion Youth Services professional/consumer relationship, especially in the case of working with minors, limits the options available to consumers, but does not eliminate their right to self-determination. Consumer self-determination refers to the client's right to make self-determined choices and to freely act upon those choices without undue influence or coercion.
2. Employees are responsible for assuring that the client receives sufficient information on the benefits and consequences of a decision in order that the client can make the best self-determined choice.

## **j. Informed Consent**

Employees will inform consumers as soon as possible and in understandable language the nature of the professional/consumer relationship, the type of interventions provided, the professional's delegated authority and the limits of that authority, to include confidentiality constraints, and the range of decisions that consumers can make. Employees are also responsible for ensuring that consumers are fully aware of their rights and our grievance procedure.

Professional employees will keep clients informed about their service plan and ensure participation in the development of the service plan throughout the entire period of service. Professional employees will obtain permission for intervention from a legally authorized person when a consumer is legally incapable of giving informed consent.

## **k. Confidentiality**

Employees will respect the confidentiality rights of clients and those with whom they work or consult. Confidential information should be used only for professional purposes and shared only with authorized parties. Employees have a duty to be familiar with all relevant confidentiality requirements and limitations in Federal and state laws, as well as DYS policy. In addition, employees will inform consumers of all relevant confidentiality requirements and limitations.

Employees will not take confidential materials from their offices and will assure that all information will be maintained in a confidential manner. This includes destroying all personal notes and/or any materials not maintained in the client's record.

### **l. Scope of Practice**

Employees will not misrepresent their professional abilities or training. Professional staff will operate within their expected code of ethics and practice of their licensing bodies at all times. Staff lacking skills and/or expertise in a particular area will request professional training and supervision to assure that best practice standards are met.

Professional staff will assure that licensure as required by their assigned position within DYS is maintained.

Professional staff receiving any form of professional sanctions will inform their supervisor immediately upon learning that such an action has been taken.

### **m. Conflicts of Interest**

Employees will not refer consumers for services with persons outside the agency in a manner to benefit themselves. This includes accepting any form of compensation or personal benefit as a result of such acts. Employees will respect the relationship of clients, foster parents and other staff and will not attempt to exploit such relationships for their personal benefit. This will include solicitation or undue influence on others even after termination of employment with DYS.

In the event that a client requires an outside referral for services, consideration will be given as to the geographic convenience for the client, affordability, appropriateness and client preferences. The client should be given more than one referral option whenever possible.

Staff members are prohibited from directing referrals of applicants and/or persons served to a private practice in which personnel, consultants, or immediate family members of said staff member are engaged. In addition, they are not permitted transfer cases to themselves in the event that they are leaving the organization to establish a private practice

No employee will conduct private practice activities on agency premises without the written consent of senior management. The employee will not serve current or former clients DYS.

### **n. Advocacy**

Employees are encouraged to exercise their full rights of citizenship, including communicating with their elected representatives. Employees may identify themselves as staff members of DYS, but only

designated members of the executive management team are authorized to sign a letter on behalf of the organization or to represent DYS on a public policy issue.

As direct service providers, employees are expected to advocate for the needs of clients. Providers are expected to use due diligence in obtaining needed resources and/or services for clients and to inform the custodian and/or custodial agency in writing should needs remain unmet. Staff should not act outside of their assigned professional role and should keep supervisors fully informed when barriers to service occur. Employees are encouraged to advocate for creative solutions to the problems of youth and families.

Provision of services under the auspices of a license requires that best practice standards and ethics of the licensing body be maintained. Employees are to ensure that continuity of service needs are met for clients whenever possible. In cases where there is still linkage, documentation should occur of contact with the custodian and/or custodial agency with recommendations of needed services to assure continuity of care or waste and best address the needs of the client.

Employees are encouraged to participate in outside advocacy groups that adhere to the DYS mission and vision of “people first”. Employees should notify the Corporate Compliance Officer if they are interested in participating in outside advocacy efforts. Information gathered at such activities should be shared with the Executive Management team, and will be documented during the Governing Body Meetings.

**o. Personal Property**

Employees will ensure that all personal property, to include that of employees and clients, is properly labeled and secured as appropriate.

**p. Witnessing of Documents**

Employees will refrain from serving as a witness to documents on the behalf of clients and/or their family members including but not limited to, Powers of Attorney, Advanced Directives, Guardianship Orders, and any other legal documents.

**q. Personal Fundraising**

Employees are prohibited from soliciting other employees and/or clients with regard to personal fundraising activities, regardless of the organization benefiting from such activity. This includes activities such as event sponsorships, sales of items to benefit schools or non-profit organizations, etc.

**8. Marketing**

Employees will refrain from engaging in any of the following marketing practices

- Engaging in any informational or marketing activities which could mislead, confuse, or defraud beneficiaries or misrepresent the service or the Department.
- Conducting door-to-door, telephonic, or other “cold call” marketing directed at prospective or current beneficiary residences.
- Conducting marketing outreach efforts directed at provider sites, day care, community organizations, church or other faith-based organizations, other social networking groups, health fairs, or school sites, unless approved by the Department through its marketing plan.
- Making home visits for direct marketing or enrollment activities except when requested by the beneficiary.
- Offering discounts or cash incentives, rewards, gifts, or other opportunities to potentially eligible beneficiaries as an inducement to enroll in the Provider’s service. Updated August 26, 2010 Va. Department of Medical Assistance Services Office of Behavioral Health Page 2 8/26/2010
- Continuous, periodic marketing activities to the same prospective beneficiary, e.g., monthly or quarterly giveaways, as an inducement to enroll.
- Using Medicaid protected health information (PHI) provided by another entity (including, but not limited to, a school system) to identify and market its plan to prospective beneficiaries, or any other violation of confidentiality involving sharing or selling beneficiary lists or lists of eligible with any other person or organization for any purpose other than the performance of the Provider’s obligations under its provider agreement.
- Contacting beneficiaries who choose to disenroll from the Provider after the effective disenrollment date except as required by the Department.
- Conducting service assessment or enrollment activities at any marketing, community, or other event.
- Asserting or stating (whether written or oral) that the Provider is endorsed by the Centers for Medicare and Medicaid Services (CMS); Department of Medical Assistance Services; Federal or State government; or similar entity.
- Offering rebates or other cash inducements of any sort to beneficiaries or individuals or organizations that refer beneficiaries to the Provider.
- Asserting or stating that the beneficiary must enroll with the Provider in order to keep him/her from losing Medicaid/FAMIS Plus benefits.
- Collecting Medicaid/FAMIS Plus ID numbers, addresses, or names to be used for marketing purposes.
- Offering of free, non-cash promotional items and “give-aways” that exceed a total combined nominal value of \$25.00 to any prospective or enrolled beneficiary or family for marketing or beneficiary retention purposes. Items that do not promote health (such as, but not limited to cigarettes) should not be used.

## **9. Contact with the Media**

Employees are expected to maintain the confidentiality of clients and company as required and may not discuss client and/or company circumstances, with any member of the media. Requests for interviews for responses to questions directed from the media are to be directed to the DYS executive management.

### **Administration and Application of Organizational Ethics**

DYS expects each person to whom this Code of Conduct applies to abide by the principles and standards set forth herein and to conduct the business and affairs of the agency in a manner consistent with the general statement of principles set forth herein. DYS will not condone or tolerate retaliation of any kind against any individual for reporting a possible violation of this Code of Conduct, or any other policy of DYS.

Failure to abide by these Organizational Ethics or the guidelines for behavior which this Code of Conduct represents may lead to disciplinary action up to and including termination. For alleged violations of the Code of Conduct, DYS will weigh relevant facts and circumstances, including, but not limited to, the extent to which the behavior was contrary to the expressed language or general intent of the Code of Conduct, the egregiousness of the behavior, the employee's work history and other factors which the organization deems relevant. The following procedure and timeline will be followed for suspected violations of the Code of Conduct:

- The violation is reported by the individual to either their immediate supervisor, program manager, Human Resources, or confidential by email at [ethicsandcompliance@dominionyouthservices.com](mailto:ethicsandcompliance@dominionyouthservices.com) within 3 business days of the incident
- Supervisor or Human Resources will review the evidence within 3 business days of the incident being reported.
- If necessary, the violation will be brought before the Executive Management team to assist in final decision within 2 business days.
- Discipline for failure to abide by the Code of Conduct may range from oral correction to termination. Nothing in this Code of Conduct is intended to nor shall be construed as providing any additional employment or contract rights to employees or other persons.
- Code of Conduct investigations will be closed within 8 business days of initial report, and the employee will be notified of the outcome by Human Resources.

While DYS will generally attempt to communicate changes concurrent with or prior to the implementation of such changes, we reserve the right to modify, amend or alter the Code of Conduct without notice to any person or employee.