



# CODE OF CONDUCT

Training FY2024

# MISSION DRIVEN-VALUES BASED



Our Values

- Integrity
- Opportunity
- Compassion
- Evolving
- Teamwork

## OUR DEDICATION



JEREMY KLEMANSKI  
PRESIDENT AND CHIEF  
EXECUTIVE OFFICER

At Gateway Foundation, we are dedicated to “doing the right thing” every single day. We value your contribution to our organization and encourage you to speak up and report any issue or concern you have about a behavior that is questionable or makes you feel uncomfortable.

You may contact a Supervisor or representative from the Human Resources department to discuss your matter. You may also report a compliance issue anytime to our hotline at 1-800-457-2598 or to the Compliance department directly at 312-913-2313 or [Compliance@gatewayfoundation.org](mailto:Compliance@gatewayfoundation.org)

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C O M P L I A N C E  
P R O G R A M

Mission Driven.  
Values Based.

## CORE VALUE: INTEGRITY

**Integrity** - We hold ourselves and our business to the highest standards of honesty and integrity. We work to build the trust of our clients, their families and our communities through our words and actions.

INTEGRITY





# CORPORATE COMPLIANCE PROGRAM PHILOSOPHY

- Gateway has established a trustworthy and fair system of incident reporting and incident management. The approach seeks to restore areas of opportunity.
- Reporting assists in identifying gaps and will ultimately improve our processes and support our mission to provide effective and efficient treatment.



# WE ENCOURAGE YOU TO SPEAK UP



The Program encourages the reporting of potential or actual issues, in order to promote early detection and resolution of any behavior or activity considered to be unethical, illegal or contrary to established policy, procedure or standard of conduct (“misconduct”).



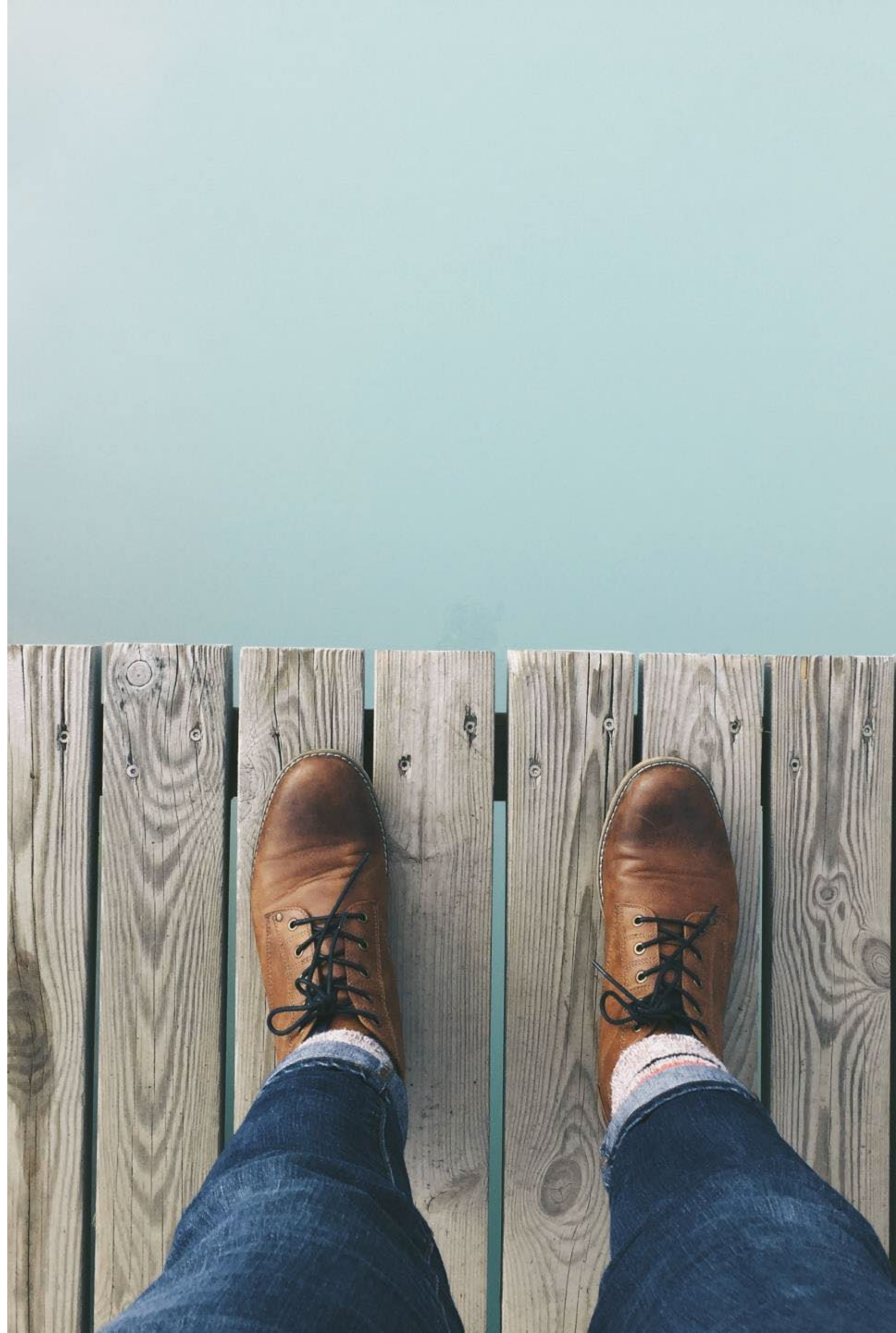
# WHAT IS THE RIGHT THING TO DO?

## **CAN WE DO THIS?**

Compliance with professional standards and laws is expected...

## **SHOULD WE DO THIS?**

Ethics means doing what is right and not merely complying with laws and regulations.



S T A N D A R D   O F  
C O N D U C T

Culture of Compliance.

## DO THE RIGHT THING

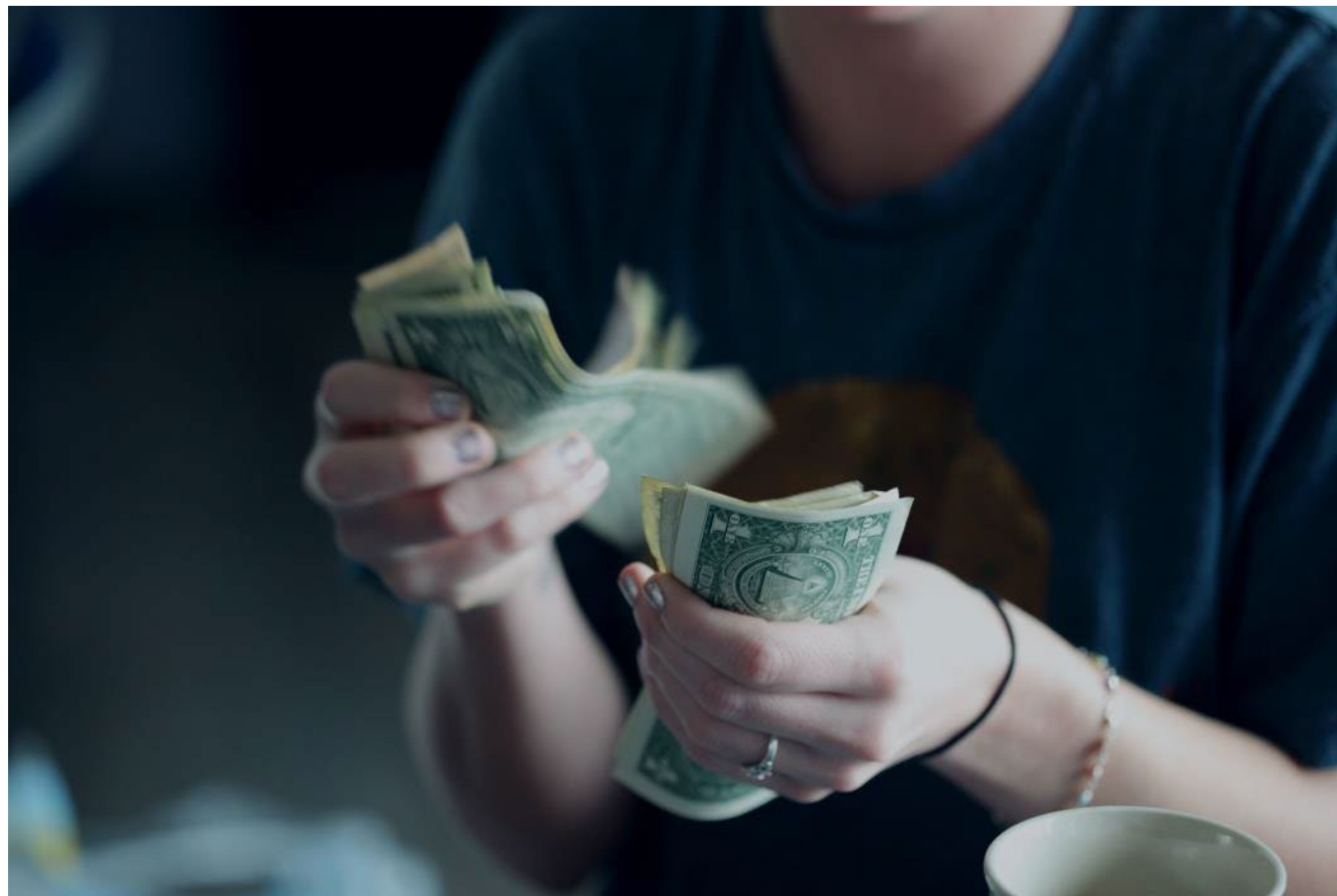
- At all times, be prepared to interact professionally, responsibly and in the best interest of Gateway and our clients.
- Keep employee interactions respectful and free from coercion or intimidation, in and out of the workplace.
- Bill for services actually provided, true to the way services were rendered.
- Gain business according to established policy, without accepting or offering payment in any form or any kind for the referral of clients, supplies, or contracts.
- Maintain the integrity and accuracy of Gateway's clinical documents and medical records, and other business records.



# KICKBACK PROHIBITION POLICY

## Policy Statement:

Gateway strictly prohibits offering or accepting payments in any form or any kind, in exchange for the referral of clients, supplies or contracts.



## MAINTAIN INTEGRITY

- Payment in any form or kind in exchange for the referral of a treatment center or recovery home client is considered a “kickback.”
- Any arrangement with even one purpose being payment in cash or of any kind in exchange for the referral of a client, supplies or contracts is a kickback and **must be reported** to the Compliance Officer.



# MAINTAIN CONFIDENTIALITY

**Confidential information** is any information owned by Gateway or accessed through Gateway information systems deemed to be confidential, proprietary or pertaining to a client or an employee.

- Use or disclosure of confidential information outside the scope of an employee's assigned duties or not within the intended purpose of an individual's job is a violation of Gateway's Code of Conduct.

# MAINTAIN CONFIDENTIALITY

- Follow Gateway policy with respect to the safeguarding of protected health information (PHI) or other business confidential information.
- Check for proper authorization before releasing any information about a client or colleague. Contact the Compliance Office if you receive any unusual requests for information.



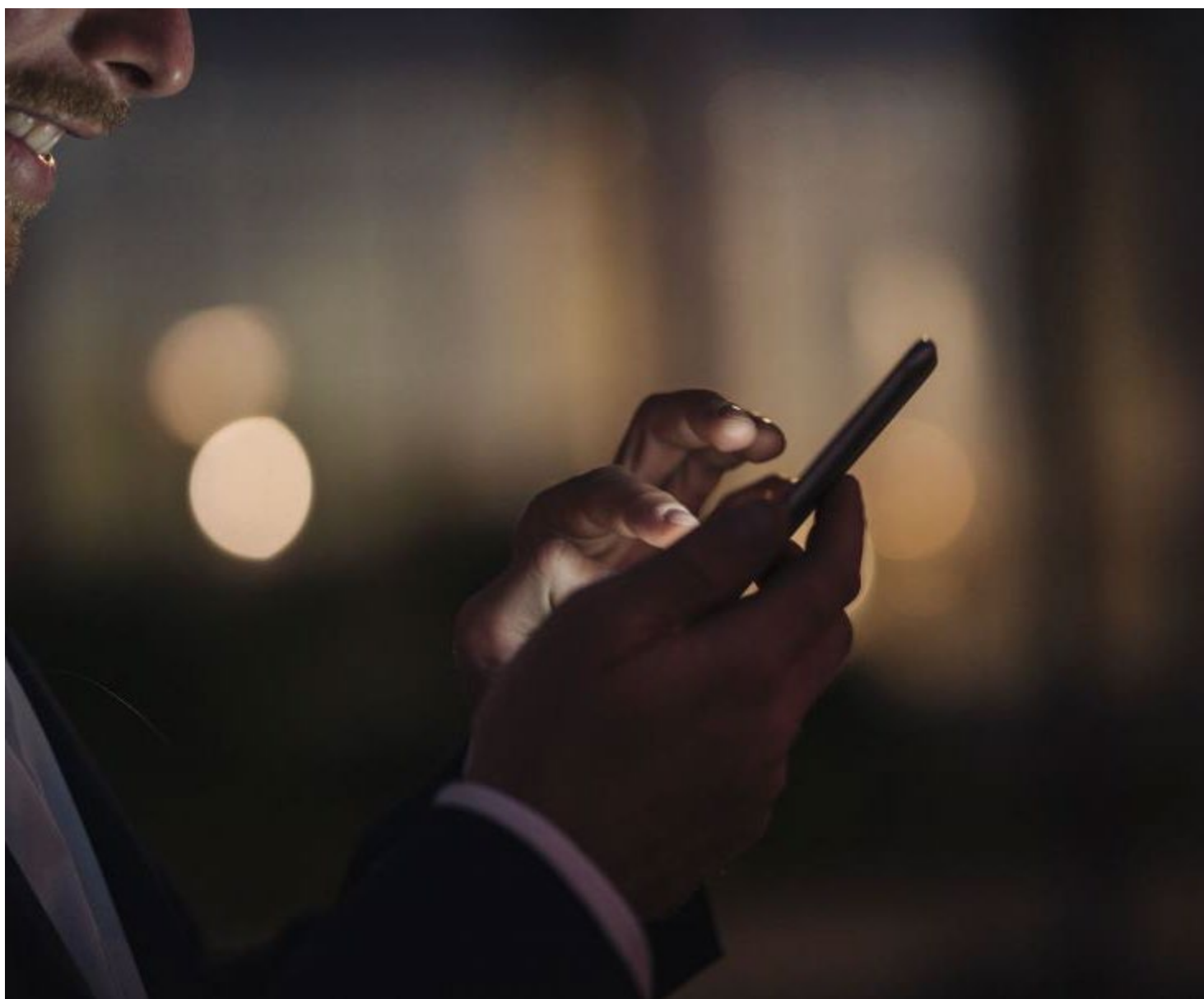
# PROPER USE AND RETENTION

**Correspondence subject to retention standards** is general or legal communication intended to record a conversation for the official Gateway business record.

- Confidential Information or correspondence subject to retention standards must be maintained in a Gateway record system with retention capability, so that it may be preserved according to the schedule in policy AFM 50 Record Retention or for potential legal holds.

## PROPER USE AND RETENTION

Business communications should be conducted primarily through company issued devices and applications, such as email or company issued cell phones.



- Business correspondence received outside of the Gateway secured network or record system (through personal or company issued cell phone texting or other messaging apps) must be transferred to the appropriate system for retention, such as a shared folder on the Gateway network, secured email or the clinical record.



## 42 CFR PART 2

Federal law and regulations protect the confidentiality of substance use disorder patient records. Gateway is required to comply with these confidentiality protections. The confidentiality of substance use disorder patient records regulations are found at title 42 of the Code of Federal Regulations (CFR) part 2 (42 CFR part 2).

**42 CFR part 2 will preempt HIPAA and State mental health laws when more protective of patient privacy rights.**

Information identifying an individual as having or having had a substance use disorder may only be provided if allowed under federal regulation. Release of information without written and signed permission may only be allowed under limited circumstances, such as in response to a court order that meets the criteria set forth in 42 CFR part 2 or to medical personnel in the event of a medical emergency.



# BREACH PREVENTION

- **Follow company policy** to prevent breaches of information
  - Check for proper authorization before releasing information
  - Encrypt email messages
- **Other Tools and Practices:**
  - Double check your email addresses, fax numbers and attachments
  - Keep your devices and passwords secured at all times
  - Read all emails slowly and carefully, and hover over email addresses and links prior to clicking them
  - **Stop and take a break if you feel stressed**



S E L F - C A R E

Compassion for Yourself.  
Compassion for Others.



## CORE VLAUE: COMPASSION

- **Compassion** - We care about our clients, their recovery, their health and their future. We are compassionate, supportive and committed to making a difference.



# MEDITATION AND MINDFULNESS

Mindfulness is part of our core curriculum.

Regular meditation practice impacts the way we respond to stress both cognitively and emotionally.





## LIKE MONEY IN THE BANK



- Regular meditation practice has been shown to fortify the brain's prefrontal cortex.
- Put a little bit in every day so you have it when you need it.



# RECOGNIZE THE SYMPTOMS OF STRESS

- Feeling irritation, anger, or denial
- Feeling uncertain, nervous, or anxious
- Feeling helpless or powerless
- Lacking motivation
- Feeling tired, overwhelmed, or burned out
- Feeling sad or depressed
- Having trouble sleeping
- Having trouble concentrating

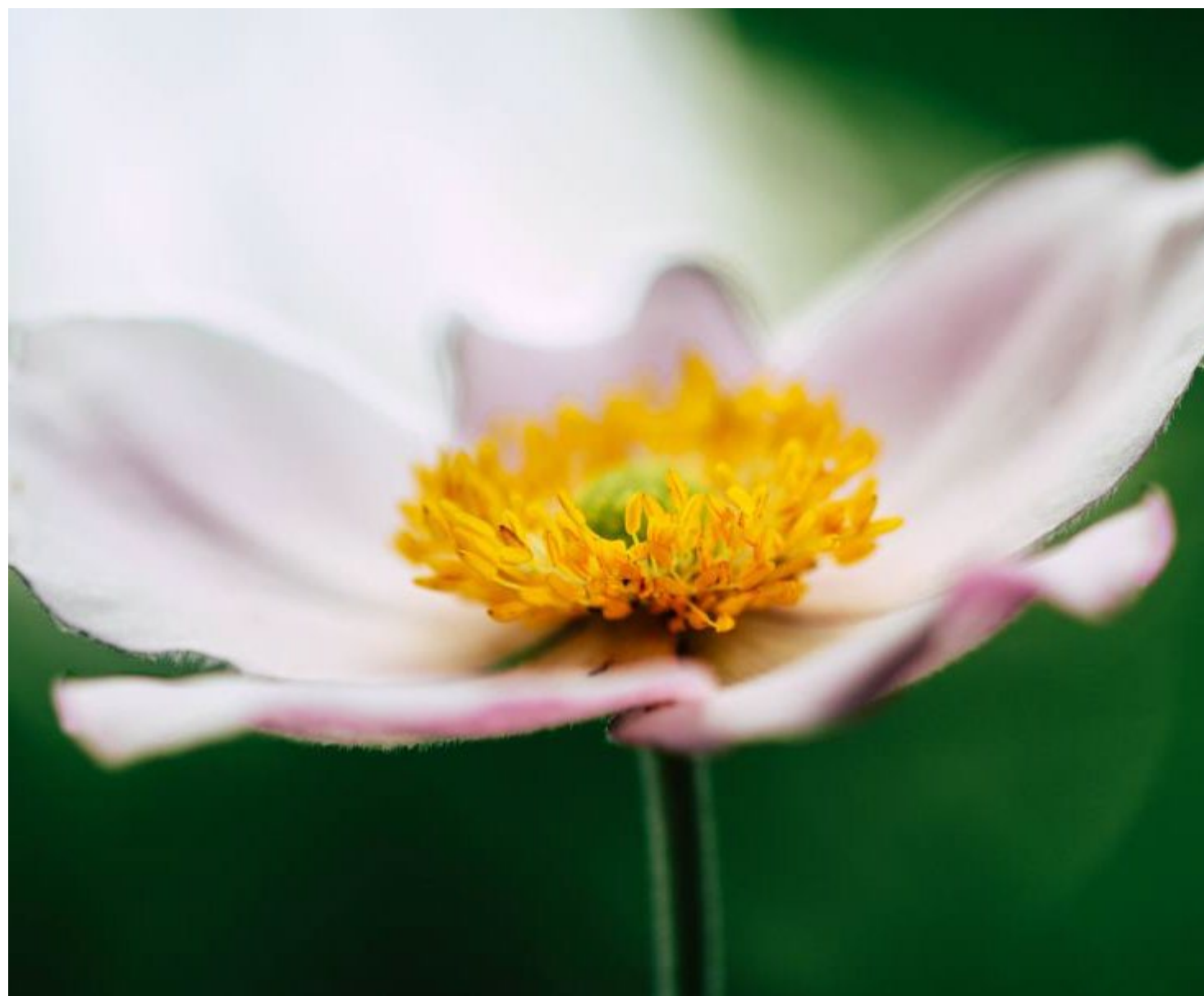


# STRESS FACTORS

- Personal problems
- Lifestyle changes
- Job problems
- Everyday hassles



## BE KIND TO YOURSELF



Cultivate appreciation for the things  
You care about

What do you like most about yourself,  
others and the world?

Don't sweat the small stuff, if you start to  
get anxious or negative, stop and  
remember:

**You Are Not Alone.**

# T E A M W O R K

We Achieve Our Mission by  
Working Together.



# CORE VALUE: TEAMWORK

- **Teamwork** - We believe teamwork builds trust, strength and a commitment to our purpose and to each other. We can only achieve our mission by working together.





# BUDDY SYSTEMS AND TEAMWORK

2-person or more teams look out for each other in these areas:

- Personal Safety
- Resilience
- Support and encouragement
- Conversation



# TEAMWORK FOR STRESS MANAGEMENT

**We encourage you to embody the core value of teamwork:**

- To help counter the stress of working in a caring profession

**If your coworker appears stressed or triggered, offer assistance:**

- Have a conversation
- Give them a break
- Let them know that you've got their back

# P R O F E S S I O N A L I S M & L A N G U A G E

Humanizing and Person-First.

# PROFESSIONAL AND ETHICAL BOUNDARIES



## Use Professional Language

Professional language is humanizing and person-first, i.e. “person in recovery” or “person who is justice involved,” or “client.”

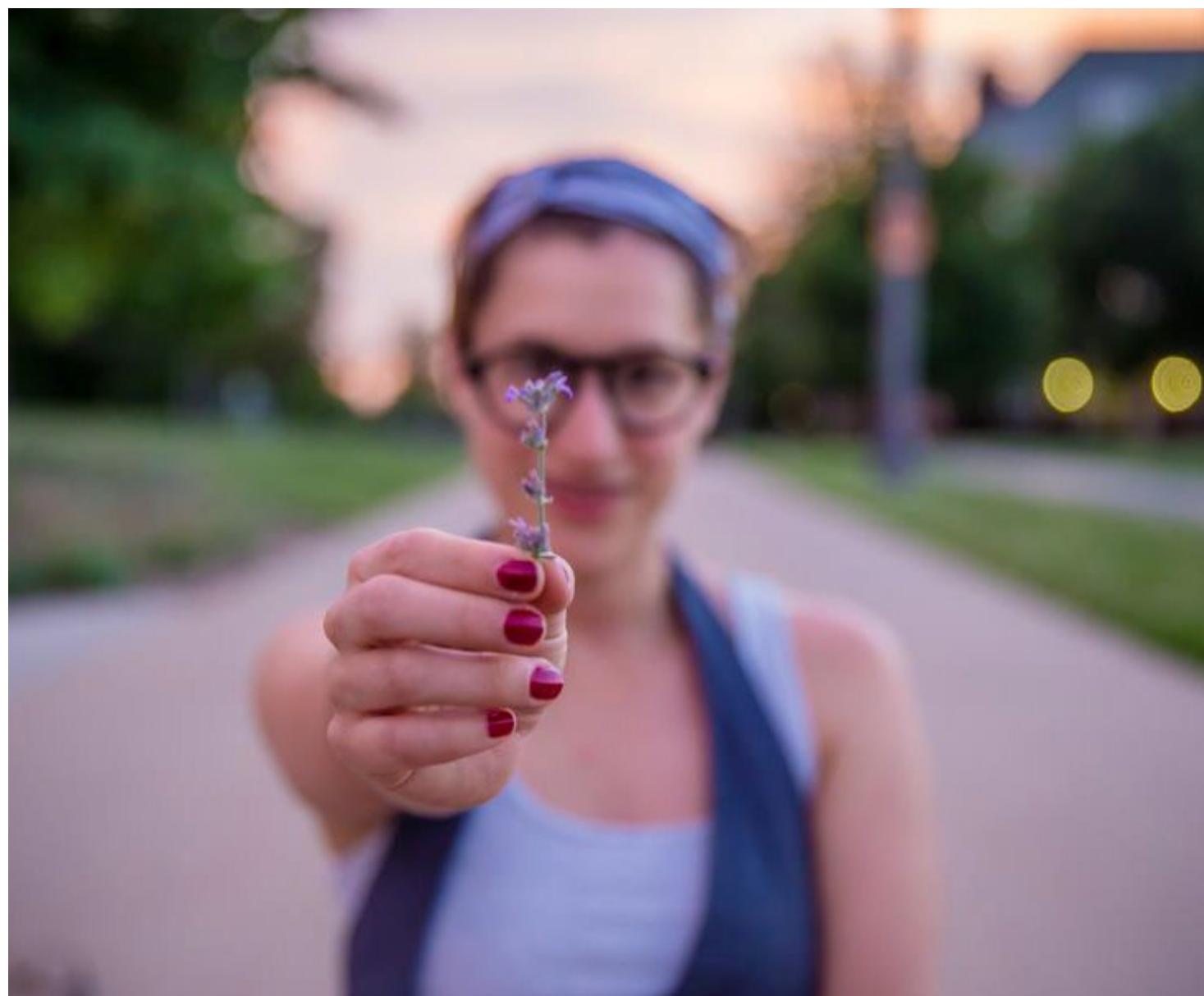
Derogatory language can be perceived as dehumanizing/degrading or offensive;

It is not effective in promoting our mission and may even perpetuate stereotypes.

*Use person-first and person-centered language.*



# PERSONAL GIFTS



- Employees cannot accept personal gifts of any kind (no matter the value).
- It is a violation of our Standard of Conduct to accept or solicit tips, gifts or services of any kind from clients, their families or visitors.

# SOCIAL CONTACT - GUIDELINES



If you inadvertently come into contact with a client or former client outside of the Gateway program, do not initiate contact. If the client or former client initiates contact, be cordial but do not extend the social interaction.

Corrections staff must notify their manager or supervisor if they come into contact with a former client - notification in writing may be required.



# SCOPE

Gateway's expectation of professionalism and boundaries applies to all employees, contractors, interns, consultants, or anyone who may have direct contact with a client.



# WARNINGS OF A BOUNDARY VIOLATION

- Over-familiarity
- Gift giving and receiving
- Keeping secrets
- Favors

**Report any warning signs!**



# REPORTING

**There is no retaliation for reports made in good faith.**

- Report a compliance issue anytime at 1-800-457-2598 or file a report online.
- To file a report online, go to:  
<https://gatewayfoundation.ethicspoint.com> select the appropriate location for your report, and then click the appropriate issue type.
- To report an issue to the Gateway Foundation Compliance Officer, email:  
[Compliance@gatewayfoundation.org](mailto:Compliance@gatewayfoundation.org)
- Contact your Human Resources Business Partner directly with employee relations concerns.

# THANK YOU!

- Every member of our organization is appreciated.
- Your safety and well-being are important.
- You are a critical component to Gateway Foundation's ethical work culture and effective treatment environment.



## REFERENCE POLICIES

- ADM 05 Corporate Compliance Employee Reporting
- ADM 21 Confidential and Protected Health Information Sanctions Guideline
- ADM 27 Kickback Prohibition
- COR 115 Corrections PREA Standards Compliance
- COR 700 Ethical Standards for Fundraising in Corrections
- Employee Guide
- Guidelines for Proper Use and Retention of Confidential Information and Correspondence
- HR 242 Employee Ethical and Professional Boundaries
- HR 244 Corrective Action
- HR 801 Social Media Usage Guidelines
- PS 104 Staff Neglect and Abuse of Clients
- PS 934 Confidential and Protected Health Information
- PS 938 Faxing Protected Health Information
- PUR 13 Vendor Gift Acceptance Policy