



Code of Conduct

2015

Introduction

Institute on Aging was established in 1975 as a legacy of Mount Zion Hospital, to help meet the growing demand for services in our community. The **mission** of the Institute on Aging is to enhance the quality of life for adults as they age by enabling them to maintain their health, well-being, independence and participation in the community. We fulfill this mission for a diverse community by developing and providing innovative programs in health, social service, creative arts, spiritual support, education and research.

Commitments

The Institute on Aging is committed to maintaining the highest professional standards in the provision of services to our clients, communities and business partners.

To our clients: We will continually develop our knowledge, skills and resources to provide programs and services of highest quality. We serve all with respect and care, without regard to income, race, religious preference, sexual orientation or gender.

To our staff: We are committed to providing safe and accessible work environments. We strive to treat all employees with fairness, dignity and respect. We endeavor to communicate our goals and expectations clearly based on the policies, requirements and guidance contained in the IOA Employee Handbook.

To the community at large: We advocate together with others in the community for needed services and programs. We maintain close collaborative relationships with other community organizations and agencies.

To our business partners: We are committed to managing contractor and vendor relationships in a fair and reasonable manner. Contracts will be entered into based on quality, technical expertise, price, service delivery and adequate resources.

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To those who support us: We recognize that your time, financial contributions, and interest make our work possible. We value this support and will utilize these resources wisely, working together to enhance the lives of those we serve.

Standards of Conduct

IOA has adopted the following standards of conduct. These standards are supplemented by agency and program policies and procedures for which all IOA employees, Board of Directors, committee members, volunteers and business partners are required to comply.

Quality of Care - IOA employees, directors, contractors, committee members and volunteers shall:

- Strive to deliver high quality, cost-effective health care and social services in compliance with all laws and IOA policies as well as the applicable policies of partner organizations as they relate to the contracted services.
- Treat all clients with courtesy, respect and dignity.
- Make every effort to honor the cultural needs of individuals.
- Deliver services in a manner to mitigate harm while respecting the wishes of the client.

Privacy & Confidentiality - IOA employees, directors, contractors, committee members and volunteers shall:

- Respect the legal rights of all clients and co-workers including rights of privacy, medical and financial decision making.
- Maintain each client and staff member's personal privacy and preserve the confidentiality of their medical and personal information in accordance with legal and ethical standards and IOA policies.

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- Protect all personal and medical information in a safe and protected manner by following all IOA and program specific record retention policies.
- Protect the privacy of staff and client personal health information (PHI) according to federal and state requirements.
- Collect, use, and retain only the personal information necessary to accomplish the work. Whenever possible, obtain any relevant information directly from the person concerned. Use only reputable and reliable sources to supplement this information.
- Retain information only for as long as necessary or as required by law. Protect the physical and electronic security of this information.
- Limit internal access to personal information to those with a legitimate business reason for seeking that information.
- Use only personal information for the purposes for which it was originally obtained.
- Obtain the consent of the person concerned before externally disclosing any personal information, unless legal process or contractual obligation provides otherwise.
- Not discuss confidential information in any public area.
- Not reveal, copy, release, alter or destroy confidential information except as authorized by IOA or required by law.

Security of Information - IOA employees, directors, contractors, committee members and volunteers shall:

- Use reasonable measures to ensure the control and safekeeping, including loss or theft, of all sensitive (i.e., business, personal and protected health) information. Reasonable measures include, but are not limited to ensuring:

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- Sensitive information is maintained in a locked area and the area is locked when a staff member is not present.
- All electronic devices (i.e., computers, laptops, tablets, phones) containing sensitive information are protected with security codes and the codes are changed on a periodic basis. Codes and passwords are not shared with others unless authorized by appropriate staff. Only authorized persons have access to information on a “needs-to-know” basis.
- Sensitive information is not visible or shared in open areas.
- Sensitive information is disposed of in shredding receptacles.
- Use reasonable measures against unauthorized access to electronic media. All security, data back-up and storage systems are maintained and monitored on an ongoing basis.
- Ensure the transmission of electronic confidential information is encrypted.

Employment Practices - IOA employees, directors and contractors shall:

- Make employment decisions without regard to race, color, gender, disability, age, creed, sexual orientation or identity, marital status, ancestry, disability, national origin, veteran status or any other legally protected status as required by federal and state laws.
- Provide equal employment opportunities based solely on qualifications, experience and abilities.
- Not employ or contract with any person or entity, associated with federal and/or state funded services that has been excluded, suspended or debarred from participation in federal or state programs.
- Upon hire, conduct thorough background checks of all employees and evaluate results to ensure there is no indication that an employee may

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represent a risk for IOA and its clients. For direct care staff, IOA shall provide ongoing background checks to help ensure the safety of clients.

- Provide training to employees to ensure they are able to carry out job performance.
- Report any suspicion of fraudulent activity or improper conduct to their supervisor and/or the Compliance Officer
- Not take action of retaliation or reprisal against an employee who reports suspected fraud, improper conduct or a violation of law, regulation, policy or this Code of Conduct.
- Adhere to all IOA policies and procedures including the Employee Handbook as well as program and department specific policies.
- Conduct IOA business with high standards of ethics, integrity, honesty and responsibility.

Workplace Conduct - IOA employees, directors, contractors, committee members and volunteers shall:

- Respect the dignity of every co-worker, regardless of title or position.
- Comply with work and safety rules, standards and training programs while performing assigned duties to prevent injury and ensure a safe environment.
- Conform to professional standards in the performance of individual duties.
- Communicate openly and honestly and respond to one another in a timely manner. Resolve differences of opinion professionally and through appropriate channels.
- Act in the best interest of IOA.
- Comply with contractual obligations.

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- Protect and not misappropriate confidential information belonging to IOA.
- Transact business free from offers or solicitation of gifts and favors or other improper inducements in exchange for influence or assistance in a transaction.
- Not act in a way that harms IOA either figuratively or actually.
- Support a workplace free of drugs, alcohol, harassment, violence and intimidation.
- Be honest and forthright in representations made to clients, vendors, contractors, payors, donors and funding sources.

Conflict of Interest - IOA employees, directors, contractors, committee members and volunteers shall:

- Avoid engaging in any activity which actually, potentially or gives the appearance of conflicting with the business interests of IOA.
- Comply with all legal and regulatory requirements concerning conflicts of interest. Disclose any conflicts of interest upon discovery.
- Disclose any outside financial interests or commercial activities, including interests and commercial activities of immediate family members, domestic partners or others with whom they have significant personal relationships that may interfere or influence the IOA employee's or agent's performance of assigned duties.
- Not accept benefits (i.e., gifts, cash, discounts, or other remuneration) from nor provide benefits to others that could be viewed as creating a conflict between personal interests and IOA's business interests.
- Avoid acquiring any business interest or participating in any other activity outside IOA that would, or would appear to compete with or act as a supplier to IOA. Engagement with a competitor or supplier of IOA must be disclosed in advance and agreed to in writing by IOA's CEO.

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Protection of Assets - IOA employees, directors, contractors, committee members and volunteers shall:

- Preserve and protect IOA assets. Assets include but are not limited to physical and intellectual property, facilities, equipment, money, business contacts, data, business strategies, financial reports and supplies.
- Exercise care and diligence in the protection of all intellectual property including but not limited to patents, copyrights, trademarks and marketing. Duplication or copying of material must be authorized unless allowed within a license agreement or part of public domain.
- Take measures to prevent unexpected loss or damage of equipment, supplies and services.
- Not remove or destroy any IOA equipment without proper authorization.
- Not install, connect or download any type of electronic equipment or software without proper approval.
- Ensure accuracy of all reports and records including financial statements, hours worked, expense reports as well as client documentation.
- Adhere to established IOA internal control procedures governing record management and asset protection.

Compliance with Laws and Regulations - IOA employees, directors, contractors, committee members and volunteers shall:

- Follow all local, state and federal laws and regulations including reporting requirements.
- Comply with IOA Code of Conduct, policies and procedures, rules and regulations that affect IOA business.
- Comply with professional practice laws and standards of practice that apply to the work for which an employee was hired.

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- Not knowingly make any false statements either verbal or written.
- Not conceal, destroy or alter regulated information except as dictated by regulations or law.
- Report suspected violations of the law, regulations, Code of Conduct, policies and procedures to the Compliance Officer, an immediate supervisor, human resources or any manager or director. Concerns can also be reported anonymously through the Compliance Hotline.
- Cooperate fully with investigational efforts.

Compliance Resolution - IOA employees, directors, contractors, committee members and volunteers shall:

- Protect the identity of people filing reports, whether in person or via the Compliance Hotline (415.524.0085), to the fullest extent possible and as permitted by law.
- Answer all inquiries and questions regarding compliance in an open and honest manner so the people reporting feel safe in filing reports.
- Thoroughly investigate all allegations reported before taking action.
- Provide an impartial investigation.
- Take appropriate action as needed, up to and including reporting violations and/or suspected violations of law and regulations to the proper local, state or federal oversight agency as well as law enforcement when warranted.
- Review policies, quality improvement measures and the Code of Conduct on a regular basis to identify, prevent and control fraud waste and abuse throughout the organization.
- Provide annual trainings on the Code of Conduct, recognition of fraud and abuse and protection of HIPAA privacy and security.