



**Purpose:**

EOSIS Team,

Every day, over 500 vulnerable people turn to us to improve their lives by getting sober and managing their mental health challenges. They turn to us because they believe that our team will provide professional, ethical care regardless of their backgrounds, behaviors or other qualities. To meet that commitment, we each need to continuously work to ensure that our own emotions or goals do not interfere with our abilities to support their paths to a healthier life. The work is hard, but our Ethical Code of Conduct helps provide each of us a compass to ensure that we stay true to our commitments to every patient and fellow team member.

We all have the responsibility to be familiar with the Ethical Code of Conduct. Please take time to understand what is expected of you. We must be diligent in ensuring we conduct ourselves in an ethical professional manner. Your adherence to our Ethical Code of Conduct is foundational to our organization's success. If you have a concern, we urge you to report it immediately to your leader or through the appropriate channels. Thank you for your commitment to our work and to those we serve.

Sincerely,  
Lew Zeidner  
EOSIS CEO

**Application:**

This policy applies to the entire EOSIS organization.

**Definitions:**

1. **Fraud:** Fraud is the intentional deception or misrepresentation that an individual knows, or should know, to be false, or does not believe to be true, and makes, knowing the deception could result in some unauthorized benefit to himself or some other person(s). Fraud involves making false statements or misrepresentation of material facts in order to obtain some benefit or payment for which no entitlement would otherwise exist. Examples of fraud include:
  - o Billing for services that were never given or to bill for a service that has a higher reimbursement than the service produced.
  - o Misrepresenting who provided the services, altering claim forms, electronic claim records, or medical documentation.
2. **Waste:** Waste means over-utilization of services or practices that result in unnecessary costs. Waste also refers to useless consumption or expenditure without adequate return, or an act or instance of wasting. An example of waste is:
  - o Providing services that are not medically necessary.
3. **Abuse:** Abuse describes provider practices that are inconsistent with sound fiscal, business, or medical practices and result in unnecessary cost to the funding source.



Abuse is similar to fraud except that there is no requirement to prove or demonstrate that abusive acts were committed knowingly, willfully, and intentionally. For example:

- o Billing for a non-covered service.
- o Misusing codes on the claim (i.e., the way the service is coded on the claim does not comply with national or local coding guidelines or is not billed as rendered).

### **Policy:**

All employees are required to uphold the highest standards of job performance and conduct themselves in a professional and courteous manner. Professional service providers must adhere to the ethical codes adopted by their respective licensure or certification authorities. The organizational ethical code of conduct statement shall be made available to all members of the workforce, persons served, and other stakeholders.

### **Business Practices:**

1. **Discrimination:** Employees must refrain from discrimination based on race, ethnicity, age, color, religion, creed, gender, national origin, sexual orientation, veteran status, financial condition, handicap, developmental disability, HIV infection, AIDS-related complex, or AIDS. This prohibition applies to agency employees, current or potential patients, service recipients, and other members of the community with whom employees may interact.
2. **Reputational Integrity:** Employees should avoid actions that could adversely affect the organization's business or reputation. This includes refraining from publicly criticizing the organization, its management, or its employees, as well as refraining from engaging in criminal conduct or other behavior that could harm the agency's business or reputation.
3. **Work Dedication:** During working hours, employees are expected to devote their full time and attention to the business and the agency's affairs.
4. **Outside Employment:** If an employee intends to engage in outside employment or business activities while employed with the agency, they must disclose the nature and extent of this activity to EOSIS and obtain written approval. Approval will be withheld only if the organization reasonably determines that the employee's outside employment or business activity could conflict with the interests of the agency or negatively impact job performance or attendance.
5. **Business Ethics:** EOSIS will use the Corporate Compliance Officer to ensure ethical business conduct and thoroughly investigate any questionable practices.
6. **Legal Compliance:** All financial, purchasing, personnel, facility development, and information technology practices must adhere to local, state, and federal laws and guidelines.

### **Records, Coding, Billing, And Accounting:**

1. **Reimbursement Basis:** Reimbursement for services rendered is based on the records prepared. Employees must ensure that records:

- o Present a true and accurate representation of the services offered.
  - o Are appropriately dated, accurately reflect the content of service, and provide the actual time spent in rendering the service.
  - o Indicate the name(s) of the provider and/or supervisor responsible for the provision/supervision of services.
  - o Are completed, data entered, accurately billed, and filed in a timely manner.
2. **Timely Reporting:** Employees must provide timely and accurate reports of the time expended in agency-related activities.
  3. **Expense Claiming:** Employees should claim only those expenses that are authorized and reasonably related to their job descriptions and not shift time or costs to inappropriate contracts or programs.
  4. **Collaboration:** Employees must participate cooperatively in supervision, peer review, and quality assurance/improvement requests and activities.
  5. **Compliance:** EOSIS employees involved in coding, billing, documentation, and accounting for consumer care services must comply with all applicable state and federal regulations and organizational policies and procedures.
  6. **Billing Accuracy:** EOSIS will bill only for services rendered, seeking the appropriate amount to which it is entitled.
  7. **Documentation:** Supporting clinical documentation must be prepared for all services rendered. If the required documentation is not provided, the service is considered not rendered.

#### Marketing Practices:

1. **Honesty and Integrity:** EOSIS will conduct marketing practices in an honest and factual manner. Marketing materials and practices will in no way mislead the public or misrepresent EOSIS's abilities to provide services.
2. **Outcome Claims:** EOSIS will not claim any service outcomes unless represented by valid and reliable outcome data and/or research studies.
3. **No Inducements:** EOSIS will not utilize monetary rewards or gifts to any potential consumer of services in an attempt to entice them to enter programs.
4. **Truthfulness:** EOSIS employees will be honest and truthful in all marketing and advertising practices pertaining to the business practices of the organization's service delivery system.

#### Contractual Relationships:

1. **Contracted Tasks:** The agency may contract with an individual or firm to perform specific tasks at an hourly rate or as specified in a signed contract. Individuals under contract are not considered employees of the agency, and proper credentials, as appropriate, are required. The agency may request verification of licensure, certification, or accreditation, and/or contractual agreements must be approved and signed by the



Vice President of Clinical Services or other associated executive leader (i.e. CEO, Vice President of Operations).

2. **Independent Contractors:** The relationship of a contractor to EOSIS is that of an independent contractor, and no benefits, whether fringe benefits or other types of benefits, will be provided because of the contractual agreement.
3. **Ethical Practices:** Contracted individuals must follow the organization's required ethical practices.

#### **Conflicts Of Interest:**

1. **Employment of Consumers:** No consumer will be hired or placed in an employee/employer relationship with EOSIS while an active participant in programming.
2. **Therapeutic Tasks:** Any programming that involves a work task and remuneration for the task will be therapeutic in nature and will be documented as such by programming guidelines based on theoretical constructs.
3. **Conflict Avoidance:** EOSIS employees will not engage in outside professional mental health services that are incompatible or in conflict with job duties within the organization.

#### **Use Of Social Media:**

1. **Acceptable Use:** Staff shall follow acceptable use of social media as it relates to EOSIS.
2. **Positive Reflection:** Staff shall only make posts that positively reflect on EOSIS and its activities.
3. **Privacy and Confidentiality:** Staff shall ensure privacy and confidentiality considerations, such as seeking written permission or consent from persons served for posts or pictures that include them and not sharing information about persons served in personal posts.
4. **Work Hours:** Staff shall not engage on social media during work hours.
5. **Monitoring:** Leadership shall monitor social media to ensure adherence to EOSIS's expectations.
6. **Hiring Process:** Leadership will use social media searches as part of EOSIS's hiring and applicant's vetting process.

#### **Service Delivery:**

1. **Rights of Persons Served:** Employee/contractors shall recognize the rights of the people we serve, particularly in their right to prompt and easy access to services, their right to complain about their services, and their right to have their complaints investigated objectively, with prompt and appropriate action.
2. **Fidelity:** All persons employed by EOSIS program owe a duty of fidelity to the organization and must never place themselves in a position where their self-interest may conflict with the interests of EOSIS services or the persons we serve.



3. **Conflict Resolution:** Employees should inform persons served when a real or potential conflict of interest arises and take reasonable steps to resolve the issue in a manner that makes the person served interest primary and protects the person served interest to the greatest extent possible.
4. **Confidentiality:** All employees are expected to maintain confidentiality of patient identifying information and to abide by all applicable federal, state, or local laws and regulations that address issues of privacy or confidentiality of records. Paramount among these laws is the Federal Confidentiality Regulations, 42 CFR Part 2, Confidentiality of Alcohol and Drug Abuse Patient Records, and the HIPAA Privacy Regulations, 45 CFR Parts 160 and 164.
5. **Integrity and Welfare:** All employees are expected to respect the integrity and protect the welfare of the person or group with whom the employee is working.
6. **Best Interests:** All employees will be willing to recognize when it is in the best interest of the patient to discharge them from EOSIS services or to refer them to another program or individual.
7. **Genuine Interest:** All employees will demonstrate a genuine interest in all patients and dedicate themselves to the best interest of the patient and their needs.

#### **Exchanges Of Gifts, Money, And Gratuities:**

1. **Prohibition:** Employees/contractors or other persons associated with EOSIS must never accept gifts, money, gratuities, favors, rewards, or other consideration from any person or business, including persons served, external stakeholders, family members, legal guardians, or caregivers, including gifts of low monetary value.

#### **Solicitation, Distribution, And Personal Fundraising:**

1. **Avoidance of Disruptions:** To avoid unnecessary avoidances and work interruptions, solicitation and personal fundraising by a staff member of another staff member or patient is prohibited on working time.
2. **Distribution Restrictions:** Staff member distribution of literature, including handbills, in work areas during the work hours of any staff member involved is prohibited.
3. **Trespassing and Soliciting:** Trespassing, soliciting, or distribution of literature by non-staff members on these premises is prohibited.

#### **Personal Property:**

1. **Respect for Property:** All personnel shall respect and safeguard the personal property of patients, visitors, and other personnel, as well as the property of EOSIS.
2. **Use of Property:** Employees will not use or allow the use of EOSIS property or equipment other than activities approved by the organization.
3. **Theft and Destruction:** Theft and destruction of property may be addressed through treatment planning (patients), disciplinary action (personnel), and/or by contacting law



enforcement, as appropriate. EOSIS is not responsible for personal property that is not safeguarded or is left unattended.

#### **Setting Boundaries:**

1. **Unauthorized Contact:** Personnel shall have no unauthorized contact with the persons served, stakeholders, family, or caregivers except in direct relationship to their position and during work hours. Employee/contractors shall keep the needs and interests of the individuals for whom services are provided as the focus of all transactions.
2. **Service Environment:** Services shall be provided in the least restrictive environment that is age-appropriate, empowering, and promotes positive quality of life outcomes for the individuals served.
3. **Professional Relationships:** All employees are expected to maintain a professional relationship with patients and others participating in agency services. Sexual advances or sexual activity with patients or service recipients are not permitted.
4. **Situational Awareness:** Remain alert and sensitive to situations, which could result in actions by any employee, regardless of position, which are illegal, unethical, or in violation of the standards of the agency and relevant professional Code of Ethics.

#### **Witnessing Of Documents:**

1. **Witnessing Restrictions:** Personnel shall not act as a witness to documents such as Power of Attorney, guardianship, advance directives, and/or agency contracts without the expressed written approval of the Vice President of Clinical Services.
2. **Authorized Countersigning:** Personnel are authorized to countersign documents such as intake forms, authorizations (i.e., release of information form), treatment plans, etc., as directly related to their job duties.

#### **Professional Responsibilities:**

1. **Compliance Responsibility:** It is the responsibility of every EOSIS employee/contractor to comply with our policy of business ethics and conduct. Disregarding or failing to comply with this standard of business ethics and conduct could lead to disciplinary action, up to and including termination of employment/contract. Employee/contractors uncertain about the proper course of action should discuss the matter openly with their supervisor. If necessary, consult the Vice President of Clinical Services or their designee (i.e. Director of Compliance).

#### **Human Resources:**

1. **Employment Applications:** EOSIS accepts applications from any persons interested in securing work with the organization. However, we do not actively recruit employees/contracts of other organizations, nor do we base hiring on the condition of any employee/contractor bringing his or her former patients to EOSIS for services.

2. **Equal Opportunity:** We are an equal opportunity employer and are committed to diversity and inclusion.
3. **Civil Rights Compliance:** EOSIS offers employment to qualified candidates in compliance with Title VII of the Civil Rights Act of 1964, amended in 1991. This law prohibits employment discrimination based on race, color, religion, national origin, sex, age, marital status, family responsibilities, and disability.
4. **Work Authorization:** EOSIS is committed to employing only United States citizens and aliens who are legally authorized to work in the United States. We follow the Immigration Reform and Control Act of 1986, which requires that every newly hired employee complete an I-9 Form and verify his/her identity and eligibility to work in the United States. EOSIS will verify documentation, sign, and date the I-9 Form.

#### **Organizational Fundraising:**

1. **Ethical Standards:** EOSIS is committed to upholding the highest ethical standards in fundraising, and as part of this commitment, it has established clear guidelines for soliciting donations, donor relations, and financial transparency. These policies are reinforced through regular training programs that empower employees and stakeholders to adhere to these principles in all fundraising endeavors.
2. **Staff Responsibility:** All staff members are entrusted with the responsibility of upholding the highest ethical standards in our fundraising efforts. This commitment entails:
  - o **Honesty and Transparency:** We expect all staff to conduct fundraising activities with utmost honesty and transparency, providing accurate information to donors and stakeholders.
  - o **Compliance with Laws and Regulations:** Staff must be aware of and comply with all relevant laws and regulations governing fundraising, ensuring that our activities are legally sound.
  - o **Donor Trust:** We place a premium on maintaining the trust of our donors. Staff members should treat donors with respect, gratitude, and confidentiality, ensuring their confidence in our organization's stewardship of their contributions.
  - o **Financial Integrity:** Fundraising staff must be diligent in the proper handling and reporting of financial transactions, adhering to strict accounting standards to guarantee the responsible use of funds.
  - o **Conflict of Interest:** Staff should promptly disclose any potential conflicts of interest related to fundraising activities and work to mitigate them to preserve the integrity of our organization.
  - o **Professional Development:** We encourage ongoing professional development and training for staff in fundraising ethics to ensure they are well-equipped to navigate ethical challenges and make principled decisions.



**Fraud, Waste, Abuse, And Other Wrongdoing:**

1. **Culture of Honesty:** EOSIS maintains a culture of honesty and ethical behavior. Fraud, waste, abuse, or other wrongdoing is strictly prohibited, and employees are expected to adhere to the highest standards of integrity.
2. **Reporting:** Employees are encouraged to report any suspicion or evidence of waste, fraud, abuse, or other wrongdoings.
3. **Supervisory Role:** In most cases, an employee's supervisor is in the best position to address an area of concern. However, if an employee is not comfortable speaking with his or her supervisor or is not satisfied with the supervisor's response, the employee is encouraged to speak with the Vice President of Clinical Services or associated leader/department (i.e. Director of Compliance, Human Resources). Supervisors and managers are required to report violations or suspected violations of the Code of Ethics to the Compliance Department, who has specific and exclusive responsibility to investigate all reported violations.
4. **Reporting Wrongdoing:** For suspected fraud, waste, abuse, or other such wrongdoings, personnel should immediately contact the Vice President of Clinical Services.
5. **Good Faith Reporting:** Anyone filing a complaint concerning a violation or suspected violation of conduct or law must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code of Ethics. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.
6. **Confidentiality:** Reports of violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.
7. **Investigation:** All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation

**Ethics Violations:**

1. **Obligation to Respond:** EOSIS recognizes its obligation to respond to any allegations of illegal or improper activities in which any of its employees may be involved. EOSIS expects and encourages all employees to report any suspected violations of the Ethical Code of Conduct by contacting the Compliance Department. Information provided by reporting employees will be treated as confidential and will be disclosed only to those individuals who require the information during the course of the investigation or to resolve the concern. Providing false information during an investigation may result in disciplinary action, including termination.
2. **No Retaliation:** EOSIS strictly prohibits any form of retaliation against employees who provide information or assist in investigations of violations of the Ethical Code of Conduct.





3. **Reporting Violations:** Any employee who suspects a violation of the Code of Conduct should contact the Compliance Department through the following means:
  - o Via Email at [Compliance.EOSIS@EOSISprograms.com](mailto:Compliance.EOSIS@EOSISprograms.com)
  - o Online Portal at <https://EOSISbhealth.navexone.com>
4. **Notification of Wrongdoing:** If anyone other than the Compliance Department is informed of suspected wrongdoing, they must promptly notify the Vice President of Clinical Services within one (1) working day.
5. **Investigation Process:** Upon receiving notice of any wrongdoing, the Vice President of Clinical Services or their designee (i.e. Director of Compliance) will convene a meeting of the management team within three (3) working days to initiate an investigation. Individuals with expertise in the relevant area, such as accounting or information technology, will be engaged as needed. The results of the investigation will be presented for appropriate action. EOSIS staff with supervisory responsibilities are obligated to report suspected violations of any illegal or improper activities

#### **Education On Ethical Codes:**

1. **Training:** To foster and uphold this trust, EOSIS provides training to all personnel upon their hire and subsequently annually to ensure all employees understand and adhere to ethical codes. This training encompasses ethical codes of conduct, including relevant laws, regulations, and agency policies.
2. **Promoting Integrity:** We promote a culture of integrity and accountability by prominently displaying EOSIS's code of ethics in public areas within the facility.

#### **Advocacy Efforts For The Persons Served:**

1. **Advocacy Commitment:** EOSIS is committed to advocating for persons served, personnel, and other community stakeholders. Our advocacy efforts involve collaborating with other organizations and the broader community to deliver training and education that aims to reduce the stigma associated with the needs, challenges, diagnoses, and disabilities of our consumers. Our advocacy initiatives include empowering persons served through knowledge and person-centered planning.
2. **Partnerships:** The EOSIS program is dedicated to cultivating partnerships with the community and organizations to coordinate advocacy efforts on behalf of not only persons served but also within EOSIS's general geographic service area.
3. **Advocacy Services:** EOSIS will continue to exhibit a strong commitment to advocacy services for persons served across various platforms, including the recipient rights process, corporate responsibility strategies, and as part of ongoing service delivery.

#### **Corporate Citizenship:**

1. **Corporate Responsibility:** EOSIS encourages corporate responsibility at all organizational levels. We endorse staff involvement in corporate responsibility activities



to not only further the organization's mission, philosophy, values, and goals but also to advocate for the needs, preferences, and desires of our consumers and the community.

2. **Community Participation:** Active participation in community organizations, public forums, communities, or service groups, is strongly encouraged. With prior approval, staff will be compensated at their regular rate of pay for up to four hours annually for their involvement in committees, participation in projects and programs focused on informing, educating, protecting, and promoting a healthy environment, participation in service groups, and conducting or participating in public education or activities.