



## DEPAUL CODE OF ETHICS FOR AFFECTED INDIVIDUALS\*

\*Defined by the OIG as Executives and Governing Body members, any person or affiliate who is involved in any way with DePaul, such that the person or affiliate contributes to DePaul's entitlement to payment under the Medical Assistance Program and who is not an employee (e.g. independent contractors, interns, students, volunteers, and vendors).

DePaul's reputation is dependent upon the good judgment, ethical standards and personal integrity of every individual involved in our agency. To further DePaul's commitment for excellence and integrity, all affected individuals (appointees, executives and Governing Body members, independent contractors, interns, students, volunteers, and vendors), are expected to adhere to this Code of Ethics in their daily interactions with individuals DePaul serves, DePaul staff, other professionals, vendors, and the public. These principles have been derived from federal, state, and local laws and regulations, DePaul policies and procedures, and generally accepted principles of ethical conduct. This code of ethics provides an overview of DePaul's commitment to the highest standards of ethical conduct and conduct contrary to these expectations will be considered a violation of the compliance program and related policy and procedures.

### 1. Corporate Compliance

Affected individuals are expected to be familiar with laws, regulations and DePaul policies and foster compliance by following State and Federal laws and regulations and DePaul policies related to their duties and responsibilities. This includes full compliance with the requirements of all medical assistance/insurance programs.

Affected individuals must maintain professional competencies related to the performance of their job and strive to continually improve those competencies and quality of services to the best of their ability.

Affected individuals are required to report any practice or condition that may violate any laws, rules or regulations, safety standards, DePaul policies or the Code of Ethics to the Corporate Compliance Officer in a timely manner.

DePaul maintains a "hotline" which affected individuals can call to report compliance concerns anonymously. The number is 1-877-778-5463, the internet address is [www.report-it.net](http://www.report-it.net). Complaints regarding acts which violate the False Claims Act, such as false claims or attempts to defraud health care programs will be promptly reported, investigated and remedied, as appropriate and required by law.

### 2. Role Definition

Interactions with the individuals DePaul serves must be professional at all times. Personal, intimate and/or sexual relationships with individuals that we serve are not allowed.

Physical contact and gestures of affection should be avoided at all times. Physical contact should be limited to a handshake. There should be no relationships with the individuals DePaul serves.

### **3. Conflict Of Interest**

Affected individuals must refrain from participating in any activity or business venture which could conflict with the interests of DePaul; specifically, affected individuals may not accept personal payment or other benefits from any supplier or person served by DePaul, nor should they take any action as a representative of DePaul for personal gain. Affected individuals must insure that there are no conflicts of interest between their duties for DePaul and other services they provide. For more information refer to the Conflict of Interest Policy and Procedure.

### **4. Confidentiality**

DePaul is committed to maintaining the highest degree of confidentiality in all of our interactions with the individuals we serve or have served in the past. In general the law prohibits the release of any protected health information without the written authorization from individuals that we serve or have served in the past. Affected individuals should not photograph, videotape, record or otherwise capture an image for anyone that we serve without his/her prior, written authorization. For more information refer to DePaul's HIPAA Policies and Procedures.

### **5. Proprietary Information**

In working for DePaul, affected individuals may learn things about our business which are proprietary or confidential. Every affected individual has a professional and ethical responsibility to treat this information as privileged and to ensure such information is not improperly or accidentally disclosed. You may not use or disclose any proprietary information to anyone who does not work for DePaul or have a need to know the information.

### **6. Receiving and Giving Gifts**

Substantial gifts, favors or excessive business entertainment from DePaul employees, individuals we serve, or their family members, are strictly prohibited. A gift, favor or entertainment is considered substantial or excessive if it might influence a business relationship with the donor. Any gift worth more than \$75.00 must be reported to the Corporate Compliance Officer. You may not lend or borrow money from individuals we serve and may not purchase or sell products or services to individuals we serve. Likewise because DePaul staff members or Board members are prohibited from accepting substantial gifts, favors or excessive business entertainment worth more than \$75.00, you are prohibited from offering them to DePaul staff or Board member.