

DePaul Standards of Conduct

DePaul's reputation is dependent upon the good judgment, ethical standards, and personal integrity of every individual in our agency. To further DePaul's commitment for excellence and integrity, all affected individuals of DePaul are expected to adhere to the Standards of Conduct. Affected individuals are identified as all persons who are affected by DePaul's risk areas including employees, full-time and part-time, the President and other senior administrators, managers, contractors, agents, subcontractors, independent contractors, governing body and corporate officers. These principles have been derived from federal, state, and local laws and regulations, DePaul policies and procedures, and generally accepted principles of ethical conduct. These Standards of Conduct provide an overview of DePaul's commitment to the compliance program and related policy and procedures. Conduct contrary to these expectations will be considered a violation of the compliance program. Affected individuals must refuse to participate in unethical or illegal conduct, and they must report any unethical or illegal conduct to the Corporate Compliance Officer.

1. **Corporate Compliance**

Affected individuals are expected to be familiar with 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 provided to the best of their ability and in compliance with key Human Resource practices including exclusion screening where required.

Affected individuals are required to report any practice or condition of fraud, potential fraud, or similar wrongdoings to include but not limited to examples such as submitting improper billing claims, inaccurate coding, falsification of documentation or providing poor quality of care that may violate any laws, rules or regulations, safety standards, DePaul policies or this Standards of Conduct to the Corporate Compliance Officer in a timely manner.

DePaul maintains an auditing program to prevent and detect fraud, waste, and abuse. For more information, please refer to DePaul's Corporate Compliance Plan and Auditing and Monitoring Policy and Procedures located on the intranet under Compliance and the internet under Corporate Compliance.

DePaul maintains a "hotline" which affected individuals can utilize to report compliance concerns or Standards of Conduct concerns anonymously. Refer to the section entitled Ethics Hotline (Reportit) on the intranet under Compliance or the internet under Corporate Compliance for more information. DePaul is committed to encouraging affected individuals to report any suspicion of fraud, waste, abuse, any other wrongdoing, or violation of the Standards of Conduct and has established a Whistle Blower Protections and Non-Retaliation policy that applies to all affected individuals. For more information, please refer to the policy which is located on the intranet under Compliance and internet under Corporate Compliance.

2. **Respect**

DePaul's policy is to treat all individuals we serve with unconditional respect. Every interaction you have is an opportunity to demonstrate compassionate care and to create a healthy environment for services, care, and/or education.

Respect is defined as showing regard or consideration for someone. Remember that everyone has the right to be treated with dignity. Often this means focusing on individual needs and preferences, showing empathy, and recognizing diversity. Examples of respect include, but are not limited to:

- Acknowledging an individual when seeing them
- Addressing an individual by their preferred gender pronouns, name, or title
- Asking permission before touching or moving an individual's personal belongings

DePaul does not tolerate behavior that is disrespectful. Examples of disrespectful behavior include, but are not limited to:

- Using inappropriate language when talking with an individual
- Ignoring an individual when they approach you for assistance
- Being impatient when interacting with or providing care or services to an individual
- Making assumptions about an individual's preferences without asking them first

3. **Role Definition**

Interactions with the individuals we serve must be professional at all times. Personal, intimate and/or sexual relationships with individuals we serve, or have served in the past, 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 we serve, or their families, outside of the workday or separate from the treatment team. Keep your personal life separate; be friendly, not friends. For more information employees may refer to the sections of the Employee Handbook titled Telephone, Computer and Internet Use and Use of Social Media. All other affected individuals may contact the Corporate Compliance Officer for more information.

4. **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 individuals served by DePaul, nor should they take any action as a representative of DePaul for personal gain. Employees may not accept a second job with an individual DePaul serves and may not accept a second job with a competitor or supplier of DePaul where there is an actual or perceived conflict. For more information refer to the Conflict of Interest Policy and Procedure available on the intranet under Compliance, internet under Corporate Compliance, or by request.

5. **Confidentiality**

We are committed to maintaining the highest degree of confidentiality in all our interactions with the individuals DePaul serves or has served in the past. In general, the law prohibits staff members from releasing any protected health information without the written authorization from individuals DePaul serves or has served in the past, and all other affected individuals from releasing any protected health information without an established and signed Business Associate Agreement. In addition, staff members must have a work-related purpose for sharing information

internally with other DePaul staff members. Affected individuals should not photograph, videotape, record or otherwise capture an image for anyone DePaul serves without his/her prior, written authorization. For more information employees may refer to DePaul's HIPAA Policies and Procedures and the section of the Employee Handbook titled [Use of Social Media](#). All other affected individuals may contact the Corporate Compliance Officer for more information.

6. Proprietary Information

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

Upon termination of employment or contract, affected individuals must return all agency property and all copies of documents, notes, computer disks, flash drives, and other items belonging to DePaul.

7. Receiving and Giving Gifts

Employees, Board members or key persons are prohibited from accepting substantial gifts, favors or excessive business entertainment from contractors, suppliers, or vendors. A gift, favor or entertainment is considered substantial or excessive if it might influence an employee's, board member's or key person's business relationship with the donor. Any gift worth more than \$75.00 must be reported to the individual's supervisor, or in the case of a Board member or key Person, the Board Chair or Corporate Compliance Officer. Employees, Board members, or key persons may not accept any gift from individuals DePaul serves, lend or borrow money from individuals DePaul serves, and may not purchase or sell products or services to individuals DePaul serves. Family members of individuals DePaul serves may make donations to DePaul or give gifts of nominal value to the site where their loved one lives, but may not give money directly to any employee, Board member or key person. Any employee, Board member or key person who accepts a gift from an individual or family member of an individual served by DePaul is in direct violation of the Standards of Conduct and will be subject to disciplinary actions as indicated. For more information refer to the Antikickback Policy and Procedures located on the intranet under Compliance and on the internet under Corporate Compliance.

8. Acknowledgement of Standards of Conduct.

Affected individuals are required to sign and date an acknowledgement of receipt, understanding, and their agreement to abide by these Standards of Conduct upon hire, affiliation with DePaul or initiation of contract.

The New York State Justice Center also requires that all employees who work with individuals in the NYS system sign a New York State Code of Conduct Form. This form is signed at hire and annually and is available upon request from the Human Resources Department.

9. Disciplinary Actions

For DePaul to maintain our commitment to excellence and integrity, it is necessary for all affected individuals to observe the policies and procedures governing DePaul's compliance program and these Standards of Conduct. If your conduct conflicts with the policies, procedures, or compliance program in any way, disciplinary measures will be taken up to and

including termination of employment, contract or affiliation with DePaul. Employees are also subject to all expectations as outlined under Serious Misconduct located in the employee handbook. For more information, please refer to the Discipline and Enforcement of Compliance Standards located on the intranet under Compliance and the internet under Corporate Compliance.