

**CORPORATE COMPLIANCE PLAN**

**&**

**ETHICAL CODE OF CONDUCT**

**POLICY:**

It is the responsibility of Dynamic Interventions Inc. (DII) to maintain a code and standards of ethical conduct that support the mission and values of the organization. All employees of the organization are expected to maintain and exercise at all times the highest moral and ethical standards in carrying out their responsibilities and functions. Employees must conduct themselves in a manner that prevents all forms of impropriety, placement of self-interest above public interest, partiality, prejudice, threats, favoritism, and undue influence.

Corporate Responsibility efforts includes a written code of ethics which represents what the agency stands for including its ethical, social, and environmental values. It involves creating, communicating and balancing values for all stakeholders, persons served, personnel and the environment. It begins with leaderships’ consistency in ensuring full adherence to the Corporate Compliance Plan and ensuring full incorporation of the vision, mission and values. (Also see attached *Code of Ethical Behavioral and Integrity)*

**APPLICIBILITY**

The provisions of this policy apply to all employees regardless of status. Employees, students, volunteers, independent contractors, and anyone who acts as a representative of DII in any way are affected by this policy.

**IMPLEMENTATION**

To ensure that proper dissemination, understanding and achievement of this plan and policy the following implementation will be followed:

1. A copy of this policy will be provided to each employee during orientation.
2. Each employee will be required to sign a Statement of Understanding which will be included in the employee’s personnel file.

**Education on Corporate Compliance Plan and Ethical Code of Conduct**

Education on both of these will be included in:

1. New Staff Orientation’s held within 30-days of their hire date
2. Yearly Update Training for existing staff members
3. More often for some staff members should grievances, allegations or incidents involving these codes arise.

**Procedure for Dealing with Allegations of Violations of Ethical Code**

* Employees have the personal responsibility to report their concerns/complaints about ethical issues or illegal activities to supervisors or members of the CQI Committee. Employees reporting suspected ethical misconduct or violations will not be reprimanded or disciplined unless the employee knowingly and intentionally reports that which is false or misleading.
* Every effort is made to maintain the confidentiality of the reporting employee’s name. However, the reported information may not be kept confidential if it is related to legal, persons in treatment/staff protection, or other risk/liability issues.
* Such reports will then be investigated by a Leadership Team Member and discussed with the entire CQI committee.
* The CQI committee will determine if an investigation is warranted internally or through the involvement of outside legal or regulating organization.
* Results of investigations with appropriate recommendations will be submitted to the Chief Executive Officer.
* Any staff person who is in violation of this policy will be subject to disciplinary action up to and including dismissal. In addition to disciplinary action, consequences may include reporting to appropriate licensing board, if applicable.
* The organization will strive to complete investigations and determine final outcomes within 60 calendar days.

**For Further Information and Resources**

*For questions, revisions or concerns, contact:*

**Tammy V. Smith, CEO and President** 912-230-0612 or tammy@dynamicinterventions.org; and/or

**Robert “Bobby” H. Smith, CFO** 478-284-9313 or bobbyatthebeach@hotmail.com; and/or

**Elizabeth Bizzell, Clinical Director** 478-952-8736 or Elizabeth@dynamicinterventions.org

**Vision:**

To be the state’s *Model of Excellence* in home and community-based mental health treatment services.

**Mission**

To provide the highest quality home and community-based mental health treatment services available to Georgia’s youth and their families.

**VALUES**

Dynamic Interventions, Inc.(DII) *in committed relationship to our families* and through their free choice partnership with persons served-clients-, their families and other organizations is dedicated to serving individuals who are most in need. Through education, treatment and rehabilitation DII:

* Provides family-driven services to our consumers in a responsive and supportive environment that respects their independence, dignity and encourages the maximum accomplishments of their goals, in their home and community natural environments.
* Provides unlimited access to the individualized services based on strengths and needs to maximize independent functioning with sensitivity to cultural differences.
* Seeks to provide a more family-driven, coordinated, comprehensive, and effective approach to providing behavioral health services utilizing an approach that streamlines funding, minimizes duplication of services, and more accurately and efficiently employs available resources.
* Believes that in order to accomplish this objective, a common sense approach must be paired with proven evidence-based mental health practices to successfully maintain and sustain families.
* Visualizes that all families in urban & rural communities should be provided effective home-based behavioral health services in a manner that minimizes disruption of daily activities and maximizes the entire family’s functionality.
* Many Guiding Principles includes services being provided in a manner that is respectful to all consumers and their cultures. Families no longer being held hostage by ineffective systems and services providers. Always place professional integrity and ethical practices above funding sources in order to accurately serve families. Although many of the initial services will mimic other programs across the state and nation involved families will truly become our partners in the design of their services. As DI endeavors to truly improve family’s functionality.
* Strives to be the catalyst for change in provider practices that are commonly utilized to maintain families.
* Staff Credentials include Licensed Doctorate and Master-leveled mental health professionals. Along with, Bachelor-leveled, well-experienced and certified Paraprofessionals. All staff receives ongoing training and clinical supervision to continue increasing their clinical skill levels.

**Build Trust and Credibility**

The success of our business is dependent on the trust and confidence we earn from our *relationships with our stakeholders: employees, contracted staff, interns, students and volunteers; customers and stakeholders*. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honorable conduct. It is easy to *say* what we must do, but the proof is in our *actions*. Ultimately, we will be judged on what we do. Dynamic Interventions must build trust and credibility by creating a work environment that will be successful long term. The only way we can maximize this is working to make every decision every day, which answers yes to the question of do it building trust and credibility.

*To our regulators:* We are committed to maintaining an environment in which compliance with rules, regulations, and sound business practices are an integral part of our culture. We embrace the responsibility to aggressively govern ourselves and to monitor the adherence to laws, regulations, and standards governing our behaviors.

*To our Accrediting Entities:*

Dynamic Interventions Inc. will interact with Commission of Accreditation of Rehabilitation Facilities (CARF) in a direct, open, and honest manner. No action will be taken in the relationship with CARF and/or surveyors that would mislead the entity or a surveyor, directly or indirectly.

*To the communities we serve:* We are committed to providing quality and cost efficient community treatment for their children, youth and families in need. We understand that each of our communities has needs, and we are committed to meeting those needs to the extent that our funding allows.

Our community includes the Department of Family and Children Services (DFCS) and Department of Aging (DOA) their mandatory reporting laws apply to all of our employees to reported suspected abuse or neglect of children and the elderly. All reports will remain confidential and the determination will be provided to the CEO. All staff are expected to cooperate with investigations and record the report in the clinical record.

*Coding, billing and cost reports for services to all government programs, private insurance payers, or individuals:* We take great care that all billing reflects truth and accuracy and those services provided are billed as provided. We emphasize that the critical nature of the complete and accurate documentation for services provided.

Our business involves reimbursement under government programs which required billing audits twice yearly conducted by APS, the external auditing agency. Our CPA also conducts aa review of cost allegations yearly during preparations for tax purposes.

**Respect for the Individual**

We all deserve to work in an environment where we are treated with dignity and respect. Dynamic Interventions is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success. We cannot afford to let anyone’s talents go to waste. Dynamic Interventions is an equal employment/affirmative action employer and is committed to providing a workplace that is free of discrimination of all types from abusive, offensive or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to his or her manager or to human resources.

*Individuals and their families:*

Our intent is to provide quality behavioral health services and successful community integration for people who experience behavioral health disabilities. We provide care that is needed and appropriate. We make no distinction in the admission, transfer and discharge of individuals or in the type of care we provide based on race, color, religion, or national origin.

* Admission: At admission all persons-served are informed of their rights and given a summary of their rights. They are given an individual handbook. Individuals have rights to make all decisions about their mental healthcare and their rights statement confirms all the applicable state and federal laws and regulations. Each individual and their family/caregiver are given a clear explanation of treatment including, but not limited to, diagnosis, treatment plan, right to accept or refuse treatment, estimate of costs, and an explanation of risks and benefits associated with treatment options. Individuals have the right to be transferred to other providers. They are afforded appropriate confidentiality, privacy, security and protective services and the opportunity to resolve their complaints. They are treated with respect, dignity, autonomy, self-esteem, civil rights, and involvement in their own care. All Dynamic Interventions staff receive training about their individual rights in order to clearly understand their role in supporting individuals and their families.
	+ Related policies are
		- Client Rights and Responsibilities,
		- Confidentiality policies
		- Privacy Practices polices,
		- Client records policies
* Referrals: We firmly and rigorously adhere to these two rules: We do not pay for referrals nor do we accept payments for referrals we make to other providers
* Transfers: Individuals will be transferred to other providers if Dynamic Interventions cannot meet their mental health needs; or if they request it.
* Individual’s Information: We collected information about client’s medical and mental health conditions, history, medications and family illnesses to provide the highest quality care possible. We realize the sensitive nature of this information, and are committed to maintaining the confidentiality of all information. Individual-specific information is released only with written approval of the individual or parent/caregiver or under conditions allowed by state or federal laws. Staff has access to this information only on a “need to know” basis. Our confidentiality and records policy identifies conditions which must exists for information to be released without the individual or their parent/caregiver’s consent.
* Health Insurance Portability and Accountability Act of 1996 (HIPPA): We have developed and implemented our HIPPA policies, procedures, and processes to which will enable us to comply with all privacy and security mandates contained in this legislation.

**Create a Culture of Open and Honest Communication**

At Dynamic Interventions’ everyone should feel comfortable to speak his or her mind, particularly with respect to ethics concerns. Supervisors have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions. We all benefit tremendously when employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

Dynamic Interventions will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the company will take appropriate action. We will not tolerate retaliation against employees who raise genuine

Employees are encouraged, in the first instance, to address such issues with their supervisors or the CD, as most problems can be resolved swiftly. If for any reason that is not possible or if an employee is not comfortable raising the issue with his or her supervisor or CD, the CEO does operate with an open-door policy.

**Set Tone at the Top**

Leadership/Management has the added responsibility for demonstrating, through their actions, the importance of this Code. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example. Again, ultimately, our actions are what matters.

To make our Code work, supervisors must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Supervisors should not consider employees’ ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication; we want the ethics dialogue to become a natural part of daily work.

**Uphold the Law**

Dynamic Interventions’ commitment to integrity begins with complying with laws, rules and regulations where we do business. Further, each of us must have an understanding of the company policies, laws, rules and regulations that apply to our specific roles. If we are unsure of whether a contemplated action is permitted by law or Dynamic Interventions’ policy, we should seek the advice from the resource expert. We are responsible for preventing violations of law and for speaking up if we see possible violations. Because of the nature of our business, some legal requirements warrant specific mention here.

APS Healthcare, the External Review Organization for the Department of Behavioral Health and Developmental Disabilities (DBHDD) performs twice yearly audits of Medicaid and non-Medicaid records for compliance with state standards. Audit results are posted on their APSERO.COM website and discussed for corrective actions as part of the CQI meetings and included in yearly strategic planning. The CD reviews randomly selected charts periodically and completed almost 100% review of all closed records-as does the Operations Manager.

***Competition/Marketing***

We are dedicated to ethical, fair and vigorous competition. We will provide Dynamic Interventions’ services based on their merit, superior quality, functionality and competitive pricing. We will make independent marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities in connection with the purchase or marketing of our services.

As marketers, we recognize that we not only serve our organizations but also act as stewards of society in creating, facilitating and executing the transactions that are part of the greater economy. In this role, marketers are expected to embrace the highest professional ethical norms and the ethical values implied by our responsibility toward multiple stakeholders (e.g., clients, employees, stakeholders, investors,peers,regulators and the host communities).
In the Marketer role, we must:

1. **Do no harm.** This meansconsciously avoiding harmful actions or omissions by embodying high ethical standards and adhering to all applicable laws and regulations in the choices we make.
2. **Foster trust in the marketing system.** This means striving for good faith and fair dealing so as to contribute toward the efficacy of the exchange process as well as avoiding deception in product design, pricing, communication, and delivery of distribution.
3. **Embrace ethical values.** This means building relationships and enhancing consumer confidence in the integrity of marketing by affirming these core values: honesty, responsibility, fairness, respect, transparency and citizenship.

As such, marketing and advertising activities may be used to educate the public, provide information to the community, increase awareness of our services, and to recruit staff. It will be presented in a truthful, informative, and non-deceptive manner. Dynamic Interventions will adhere to Anti-trust laws of fairness in competition.

***Proprietary Information***

It is important that we respect the property rights of others. We will not acquire or seek to acquire improper means of a competitor’s trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property.

***Selective Disclosure***

We will not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any material nonpublic information with respect to Dynamic Interventions, its securities, business operations, plans, financial condition, results of operations or any development plan. We should be particularly vigilant when making presentations or proposals to stakeholders or community groups to ensure that our presentations do not contain material nonpublic information.

***Health and Safety***

Dynamic Interventions’ is dedicated to maintaining a healthy environment. A Health and Safety Plan and related policies are designed to all staff members educate you on safety in the workplace. If you do not have a copy of this information, please see the Operation Manual.

Environmental laws and regulations related to our operations will be followed at all times. All permits, approvals and controls will be secured at all operational sites. To the extent possible we will preserve our natural resources.

**Avoid Conflicts of Interest:**

***Conflicts of Interest***

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may be faced with situations where the business actions we take on behalf of Dynamic Intervention may conflict with our own personal or family interests because of the course of action that is best for us personally may not also be the best course of action for Dynamic Interventions. We owe a duty to Dynamic Interventions to advance its legitimate interests when the opportunity to do so arises. We must never use Dynamic Interventions property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with Dynamic Interventions.

**Here are some other ways in which conflicts of interest could arise:**

1. Being employed (you or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while you are employed with Dynamic Interventions.
2. Hiring or supervising family members or closely related persons.
3. Serving as a board member for an outside competitor company or organization.
4. Owning or having a substantial interest in a competitor, supplier or contractor.
5. Having a personal interest, financial interest or potential gain in any Dynamic Interventions’ transaction.
6. Placing company business with a firm owned or controlled by a Dynamic Interventions employee or his or her family.
7. Accepting gifts, discounts, favors or services from a customer/potential customer, or competitor.

Determining whether a conflict of interest exists is not always easy to do. Employees with a conflict of interest question should seek advice from our leadership. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review from their supervisor or CEO.

***Personal Fund Raising***

Dynamic Interventions staff will not be carrying out any form of personal fund raising activities (for any formal or informal organizations or personal use) during work hours. No Dynamic Interventions’ staff member will ask another for any form of related donation. Any form of this will be considered a conflict of interest.

***Political Activities:*** Due to state and federal funding sources we are prohibited from participating in political activities. Dynamic Interventions will not fund promote, or participate in any form of political activity.

Any and all staff may participate in the political process on their own time and at their own expense. While doing so, it is important to not give the impression of speaking or donating on behalf of or representing our organization.

***Gifts, Gratuities and Business Courtesies***

Dynamic Interventions is committed to competing solely on a merit of our services. We should avoid any actions that create a perception that favorable treatment of outside entities or clients by Dynamic Interventions was sought, received or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom Dynamic Interventions does or may do business. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business incentives that would violate law, regulation or polices of Dynamic Interventions or clients, or would cause embarrassment or reflect negatively on Dynamic Interventions reputation.

***Accepting Business Courtesies***

Most business courtesies offered to us in the course of our employment are offered because of our positions at Dynamic Interventions. We should not feel any entitlement to accept and keep a business courtesy. Although we may not use our position at Dynamic Interventions to obtain business courtesies, and we must never ask for them, we may accept unsolicited business courtesies that promote successful working relationships and good will with the companies and stakeholders that Dynamic Interventions maintains or may establish a business relationship with.

Staff members who can influence the allocation of business, who create specifications that result in the placement of business or who participate in negotiation of contracts must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect the company’s reputation for impartiality and fair dealing. The prudent course is to refuse a courtesy from a contract staff member or stakeholder when Dynamic Interventions is involved in choosing or reconfirming a contractor or stakeholder or under circumstances that would create an impression that offering courtesies is the way to obtain Dynamic Interventions business.

***Meals, Refreshments and Entertainment***

We may accept occasional meals, refreshments, entertainment and similar business courtesies that are shared with the person who has offered to pay for the meal or entertainment, provided that:

* They are not inappropriately lavish or excessive.
* The courtesies are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity.
* The courtesy does not create the appearance of an attempt to influence business decisions, such as accepting courtesies or entertainment from a supplier whose contract is expiring in the near future.
* The employee accepting the business courtesy would not feel uncomfortable discussing the courtesy with his or her supervisor or co-worker or having the courtesies known by the public.

***Gifts***

Employees may accept unsolicited gifts, other than money, that conform to the reasonable ethical practices of the marketplace, none can be accepted from clients directly served in our clinical program as discussed in the gift giving policy. Marketing gifts may include:

* Flowers, fruit baskets and other modest presents that commemorate a special occasion.
* Gifts of nominal value, such as calendars, pens, mugs, caps and t-shirts (or other novelty, advertising or promotional items).

Generally, employees may not accept compensation, honoraria or money of any amount from entities with whom Dynamic Interventions does or may do business. Tangible gifts (including tickets to a sporting or entertainment event) that have a market value greater than $100 may not be accepted unless written approval is obtained from leadership.

No gifts can be accepted from any client.

Employees with questions about accepting business courtesies should talk to their supervisors or the CEO.

***Offering Business Courtesies***

Any employee who offers a business courtesy must assure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon Dynamic Interventions. An employee may never use personal funds or resources to do something that cannot be done with Dynamic Interventions resources. Accounting for business courtesies must be done in accordance with approval of the CEO and CFO.

Other than to our government customers, for whom special rules apply, we may provide nonmonetary gifts (i.e., company logo apparel or similar promotional items) to our customers. Further, management may approve other courtesies, including meals, refreshments or entertainment of reasonable value provided that:

* The practice does not violate any law or regulation or the standards of conduct of the recipient’s organization.
* The business courtesy is consistent with industry practice, is infrequent in nature and is not lavish.
* The business courtesy is properly reflected on the books and records of Dynamic Interventions.

**Set Metrics and Report Results Accurately**

***Accurate Public Disclosures***

We will make certain that all disclosures made in financial reports and public documents are full, fair, accurate, timely and understandable. This obligation applies to all employees, including all financial executives, with any responsibility for the preparation for such reports, including drafting, reviewing and signing or certifying the information contained therein. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

Employees should inform the CEO if they learn that information in any filing or public communication was untrue or misleading at the time it was made or if subsequent information would affect a similar future filing or public communication.

***Corporate Recordkeeping***

We create, retain and dispose of our company records as part of our normal course of business in compliance with all Dynamic Interventions, state and federal policies and guidelines, as well as all regulatory and legal requirements.

All corporate records must be true, accurate and complete, and company data must be promptly and accurately entered in our books in accordance with Dynamic Interventions ‘and other applicable accounting principles.

We must not improperly influence, manipulate or mislead any unauthorized audit, nor interfere with any auditor engaged to perform an internal independent audit of our books, records, processes or internal controls.

**Promote Substance Over Form**

At times, we are all faced with decisions we would rather not have to make and issues we would prefer to avoid. Sometimes, we hope that if we avoid confronting a problem, it will simply go away. At Dynamic Interventions, we must have the courage to tackle the tough decisions and make difficult choices; secure in the knowledge that Dynamic Interventions is committed to doing the right thing. At times this will mean doing more than simply what the law requires. Merely because we can pursue a course of action does not mean we *should* do so. Although Dynamic Interventions’ guiding principles cannot address every issue or provide answers to every dilemma, they can define the spirit in which we intend to do business and should guide us in our daily conduct.

***Accountability***

Each of us is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about company policy. If we are concerned whether the standards are being met or are aware of violations of the Code, we must contact the CEO. Dynamic Interventions takes seriously the standards set forth in the Code, and violations are cause for disciplinary action up to and including termination of employment.

**Be Loyal**

***Confidential and Proprietary Information***

Integral to Dynamic Interventions’ business success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, clients and other stakeholders. Confidential and proprietary information includes such things as reimbursement rates, other pricing and financial data, customer names/addresses or nonpublic information about other client or companies, including current or potential vendors and stakeholders. We will not disclose company or client confidential and nonpublic information without a valid business purpose and proper authorizations.

***Use of Company Resources***

Company resources, including time, material, equipment and information, are provided for company business use. Nonetheless, occasional personal use is permissible as long as it does not affect job performance or cause a disruption to the workplace.

Employees and those who represent Dynamic Interventions are trusted to behave responsibly and use good judgment to conserve company resources. Supervisors and Leadership are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, we will not use company equipment such as computers, copiers and fax machines in the conduct of an outside business or in support of any religious, political or other outside daily activity, except for company-requested support to nonprofit organizations. We will not solicit contributions nor distribute non-work related materials during work hours.

In order to protect the interests of the Dynamic Interventions network and our fellow employees, Dynamic Interventions reserves the right to monitor or review all data and information contained on an employee’s company-issued computer or electronic device, the use of the Internet or Dynamic Interventions’ electronic record or other intranet systems. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate.

Questions about the proper use of company resources should be directed to your manager.

***Media Inquiries***

Dynamic Interventions is a high-profile company in our community, and from time to time, employees may be approached by reporters and other members of the media. In order to ensure that we speak with one voice and provide accurate information about the company, we should direct all media inquiries to the CEO. No one may issue a press release without first consulting with the CEO.

**Do the Right Thing**

Several key questions can help identify situations that may be unethical, inappropriate or illegal. *Ask yourself:*

* Does what I am doing comply with the Dynamic Interventions guiding principles, Code of Conduct and company policies?
* Have I been asked to misrepresent information or deviate from normal procedure?
* Would I feel comfortable describing my decision at a staff meeting?
* How would it look if it made the headlines?
* Am I being loyal to my family, my company and myself?
* What would I tell my child to do?
* Is this the right thing to do?

**PROFESSIONAL RESPONSIBILITY**

*All Dynamic Interventions’ Human Resources (HR) which are staff members-salaried, hourly or contractual; and our volunteers, interns, etc*.

As HR, we are responsible for adding value to the organizations we serve and contributing to the ethical success of those organizations. We accept professional responsibility for our individual decisions and actions. We are also advocates for the profession by engaging in activities that enhance its credibility and value.

It is the responsibility of all staff members which have required licenses, certifications, and other credentials, to maintain current credentials to comply at all times with federal and state requirements applicable to their respective disciplines. Copies of their current licenses and credentials will be maintained in their personnel files. These and updates when necessary are required for employment. Most Dynamic Interventions’ staff members are provided evidence-based practice training and upon request may be eligible for assistance with CEU’s-regardless, the employee always remains fully responsible for maintaining credentials and licenses.

**CORPORATE CITIZENSHIP**

Citizenship – to fulfill the economic, legal, philanthropic and societal responsibilities that serve stakeholders.  To this end, we will:

* Participate in community events on client issues and support for their parents and caregivers;
* Be actively involved with DFCS, courts, juvenile justice and other child serving agencies in our communities.
* Educate parents on the harmful effects of prescription drugs when not truly necessary for basic mental health issues.

**More Specific Requirements**

**Non-Work Time**

In general, DII is not concerned as an employer with the non-work time of employees. Off-duty conduct becomes a legitimate concern, however, when it affects organizational operations or reflects unfavorably on DII. Such off-duty conduct may result in appropriate disciplinary actions against the employee concerned.

Employees are required to notify their supervisor or Clinical Director of any arrests and/or convictions within five calendar days of the date of arrest or conviction. A determination of appropriate action will be made on a case-by-case basis.

**Conditions of Employment**

Employees must comply with the conditions of employment specified in policies, rules, and laws, which are applicable to all employees. Examples include but are not limited to:

a. Professional relationships with co-workers and supervisors. Seeking, accepting and completing assignments within deadlines. Maintaining a courteous, professional demeanor in the presence of consumers, the general public, and other employees. Giving clear and accurate information in a professional manner. Using appropriate telephone and electronic-computer courtesy.

1. Punctuality in reporting to work. Observing appropriate call-in procedures for late arrival and/or absence. Observing provisions of the Fair Labor Standards Act. Observing policies on break and lunch periods. Using work time for work related activity.

d. Appropriate use of leave including timely requests and provision of documentation for use of leave when required.

1. Observance of established policies on health, safety, security and sanitation. Notification to supervisors of circumstances or situations that present potential health hazards.
2. Observance of rules and policies that are prescribed within these standards of conduct and others specifically related to job responsibilities.
3. We are committed to an alcohol and drug free work environment and no staff should report to work under their influence. No using, possession, or selling of illegible drugs or substances will be tolerated  **If this happens the employee may be reported to legal authorities and/or terminated.**

It is recognized that staff may take prescription drugs which can impair judgment or other skills required for job performance. Staff members are to consult with their direct supervisor if they have questions or concerns about their meds or the CEO.

 **Use of Privileged Information or Confidential Information**

* 1. Release of Information**:** Privileged or confidential information (e.g., contract bids, certain financial, personnel, or consumer information, etc.) is to be released only by authorized DII persons. The release of any privileged or confidential information, financial or otherwise, is not authorized to any person who does not have a legitimate need to know.
	2. Use of Computer Information: Use of computers to obtain information about consumers, other employees, or third parties for non-work related reasons is strictly prohibited.

**Use of DII Property**

a. Employees are responsible for reporting suspected criminal or administrative misconduct including fraud, waste, and abuse relating to any DII program or operation. Negligent use and/or destruction of DII property is prohibited.

1. Employees are not to use or permit the use of DII property for other than official activities. Any form of communication (e.g., voice mail, e-mail, or fax transmittals) should convey only professional, business-like messages. DII property includes but is not limited to:
* Telephones (including agency cell phones), pagers and other communications devices
* Automobiles and other agency or state-owned vehicles
* Office equipment (including computers)
* Supplies of all kinds

**Personal Appearance during Work Hours**

1. As representatives of the DII, employees should present a business-like professional image

**Activities and Conduct During Working Hours**

1. Employees are expected to maintain a professional and business like relationship with fellow employees. DII will not tolerate acts or threatened acts of violence in the work place. Reports of threats or acts of violence will be taken seriously and thoroughly investigated by management. Examples of prohibited behavior are:
	1. Threatening, abusive, or profane language or written material;
	2. Argumentative behavior, whether directed toward a supervisor, consumer, co-worker, or any other party while on duty or while acting under color of office;
	3. Fighting; and
	4. Unprofessional behavior such as sexual-related conversations, inappropriate touching of another employee (e.g., kissing, hugging, massaging, sitting on laps), racial or ethnic jokes and slurs, and other verbal or physical conduct of an offensive nature.
	5. Intimate relationships between managers or supervisors and their subordinate staff members, through any line of authority, based on the significant potential for such relationships to present an actual or perceived conflict of interest. Employees who enter into such relationships are expected to notify higher management of the need for one or both of the employees in the relationship to be reassigned, so that a line relationship no longer exists between the employees.

**NOTE: Intimate relationships between co-workers are prohibited when the relationship has a demonstrated negative effect on the performance of either co-worker or the effective, efficient functioning of the work unit.**

b. Employees are required to cooperate and provide assistance, when appropriate, with any type of investigation regarding alleged criminal or administrative misconduct. This includes activities such as cooperating in interviews; answering questions related to the performance of official duties, producing requested documents, handwriting samples and polygraph examinations.

1. Employees are not to engage in activities other than official business during working hours. Prohibited activities include, but are not limited to:
* Lending or borrowing money;
* Gambling
* Conducting an outside business while on duty by any means of communication, such as wearing beepers, operating fax or copier machines, telephones, etc.; and
* Being on call for other employment.

d. Employees are not authorized to tape record conversations at work unless work related and specifically approved by the manager of the program. Managers are not to tape record conversations; meetings, etc. unless there is a specific work related reason for doing so. Managers should consult with the Chief Executive Officer prior to taping or authorizing the taping of conversations. Certain individuals, such as state investigators, due to the nature of their job, are authorized to tape record conversations when necessary and appropriate.

e. Employees are prohibited from falsifying records (i.e. time cards, sign in/out sheets, case management and/or consumer records) or any other documents prepared in the course of business.

f. Employees are not authorized to carry weapons (e.g., knives, firearms, or explosive devices) while at work.

g. Possession or consumption of alcohol or illegal drugs; and/or reporting to work or being on duty while under the influence of drugs or alcohol is prohibited.

h. In order to minimize interference with normal operations and to avoid potential hazards and liability for DII visitors (e.g., children, other relatives, friends or acquaintances of employees) in the work place during work hours are discouraged. Babysitting of children by employees while on duty is prohibited. Work units may establish specific prohibitions in accordance with work-related needs.

i. Certain personnel will be asked to witness client or staff signatures on certain documents. These witnessing staff members shall only do so when the signer fully understands the content and ramifications of what they are signing and or agreeing to allow.

**Activities and Relationships with Non-Employees**

1. Licensed Independent PR actioners or other subcontracted Providers: Business arrangements are made with Lighthouse nursing agency and any other licensed provider to ensure full compliance with legal requirements. These sub-contractors are approved by the CEO.
2. Employees must be alert in conducting business with non-employees to avoid even the appearance of misconduct, personal or financial gain or conflict of interest.
3. Employees must report ownership or partial ownership of a company if the company in which the employee is part owner is doing business, or seeks a business relationship with DII where the employee works.
4. Employees are prohibited from accepting personal favors or benefits under circumstances which may be reasonably construed as influencing or giving the appearance of influencing the employee’s official activities. Such favors and benefits may not be accepted by the employee on behalf of other individuals.
5. Employees are prohibited from involvement in official activities in which a consumer/applicant/recipient of DII services or financial assistance is a relative, or in-law. Employees are prohibited from involvement in official activities in which a consumer/applicant/recipient of DII services or financial assistance is a personal acquaintance when the relationship creates a conflict or perception of conflict of interest.
	1. Employees are required to report such circumstances to their supervisors to avoid the appearance of giving unjustified preference or conflict of interest.
	2. Employees are encouraged to discuss the above circumstances with their supervisors if there are any questions concerning relatives, in-laws, or acquaintances with regard to this policy.
6. Employees must conduct themselves in a positive and courteous manner toward consumers. Mistreatment of consumers in any form is a matter of concern to all supervisory levels and will not be tolerated. Prohibited activities include, but are not limited to:
	1. Procuring alcohol or illegal drugs for or from consumers;
	2. Receiving gifts or favors from consumers or from relatives, friends or acquaintances of consumers;
	3. Gambling, buying, selling, trading, borrowing or lending goods or money with consumers;
	4. Using relationship with, or clinical information obtained, on current or former consumers to take unfair advantage of the consumer, their relatives, friends, or personal acquaintances; and
	5. Engaging in sexual relationships, physical sexual conduct, or inappropriate verbal sexual conduct with consumers, or otherwise taking sexual advantage of consumers.
7. Employees are prohibited from membership on the Board of Directors of any private or private non-profit agency with which the DII contracts.

**Client Rights**

**As a client you have certain rights including but not limited to:**

* Get respectful treatment suited to *your* needs that will be most helpful to you.
* Have a safe treatment setting, free from abuse (sexual, physical, emotional and/or financial), manipulation or exploitation, revenge, any form of discipline and neglect.
* Take part in the planning your own treatment and knowing the benefits, risks, and/or

side effects of all medications and treatment choices.

* Receive treatment without regard to race, sex, or age and not take part in research projects.
* Know the cost of your treatment and your responsibility for treatment
* Refuse to answer any questions or give any information you choose not to answer or give.
* Receive a separate Notice of Privacy Practices about privacy protected health information.
* I understand that I have the right to know if my therapist will discuss my case with supervisors or peers. I understand that no portion of my therapy may be recorded in audio or video form without my informed written consent, and that if, consent to have any portion of my therapy recorded I have the right to know who will see or hear the recording(s), for what purpose(s) the recording(s) will be used, and when and how the recording(s) will be erased or destroyed.
* You have the right to have what you tell me kept private except in the paragraph described below.
* There are some situations in which I am required by law to reveal some of the things you tell me, even without your permission, and if I do reveal these things I am not required by the law to tell you that I have done so. Here are some of these situations:
1. If you seriously threaten to harm another person, I must warn that person and the authorities.
2. If a court orders me to testify about you, I must do so.
3. If I am testing or treating you under a court order, I must report my findings to the court.
4. If you are under the age of 18 and have been emotionally, sexually or physically abused or neglected, I must report this to the Department of Family and Children Services.
5. In general, as a therapist, para-professional or CSI I am bound to report any knowledge of sexual or physical abuse or neglect OF ANY PERSON to the authorities that I may learn of through ANY source. For example, if I am treating any client and learn that their abuser has current, significant access to a minor child, I will have to report this.
6. In cases when you give me written permission to talk with other persons or agencies.
* Ask that the therapist inform you of your progress.
* Report dishonest and illegal behavior by a therapist.
* File a complaint if these rights are ignored and know it will be examined and worked out.
	+ Consult with your own physician or attorney; self-help or advocacy group when filing a complaint
	+ Be free from discrimination and any form of discipline or revenge due to any complaint or report made
	+ You are encouraged to ask questions about your services and your rights. You may talk with anyone on staff about these.
	+ You may ALSO talk to someone outside the agency by contacting the Department of Behavioral Health at DBHDDconstituentservices@dbhdd.ga.gov or the DBHDD Regional Office at: 404/657-5964

**Code of Ethical Behavioral and Integrity**

**Ethics is a branch of philosophy which deals with moral issues, expectations of behavior and standards of conduct. As part of the signed agreement to adhere to the Ethical Code of Conduct Code all Dynamic Interventions staff should:**

1. Place the welfare and safety of the individuals and their families above all other concerns.
2. Comply with the policy in individual client rights
3. Do not harm an individual, either physically or psychologically. We will not verbally assault, ridicule, treat as inferior or endanger an individual. We will not allow other individuals or staff to do so.
4. Refrain from any activity that could be perceived as a potential conflict of interest or as exploitation of individuals for personal, sexual, financial, or social gain.
5. Recognize and respect the rights of individuals, and co-workers to their values and beliefs, as well as cultural, religious, sexual orientation, gender and ethical differences.
6. Remain aware of personal skills and limitations. Accept responsibility for continuing education and training in your disability field(s). Be willing to recognize when it is in the best interest of individuals to be released or refer them to another program or professional.
7. Treat any and all individual data information as confidential per State and Federal Laws.
8. Base treatment planning, outcomes and service provision on the assessment(s) of individual needs not their community status or influence.
9. Exhibit responsible concern for unethical conduct by co-workers by addressing it directly or reporting to your supervisor the Leadership staff or CEO.