

July 1, 2018

Dear Communities Connected for Kids Employee / Independent Contractor:

The 2018 version of the Communities Connected for Kids (CCK) *Standards of Conduct* is designed to help you understand the various components of the Compliance Program. These *Standards* apply to CCK and all of its affiliated entities. These Standards of Conduct are a fundamental part of the way we do business. It is essential that every employee and independent contractor have a thorough understanding of this manual. I encourage you to use this *Standards of Conduct* manual as a reference guide following the completion of your initial or refresher compliance training.

At CCK, we are committed to providing high quality human services to our clients in an ethical and respectful manner. This means we conduct ourselves responsibly and with integrity. Each employee and independent contractor has a personal obligation to uphold the high ethical standards of our organization, which are reflected in this manual.

The *Standards of Conduct* were created to guide your actions when dealing with many different types of situations you may face in your work at CCK or in the provision of services on CCK's behalf. The *Standards of Conduct* are not intended to replace any existing policies or procedures that CCK has in place, but rather to elevate their importance and ensure a consistent focus and understanding.

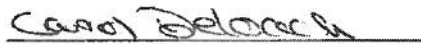
As part of our ongoing compliance program, CCK:

- provides HIPAA training to all new employees within 2 weeks of their employment and to all new independent contractors within 2 weeks of signing their Independent Contractor Agreement
- provides annual HIPAA Refresher Training to all employees and independent contractors; this training is offered on-line.
- includes promotion of and adherence to the *Standards of Conduct* as a part of every performance evaluation
- references the *Standards of Conduct* to all contracts with those who do business with CCK
- conducts sanction screening of all employees and independent contractors prior to their hiring and as required by external state and federal regulatory, licensing or funder agencies.

The success of compliance with the Standards of Conduct depends upon all of us. Please take time to familiarize yourself with the *Standards of Conduct* and related HR policies. If any part of this document is unclear to you, or if you have any questions about a situation you are facing, there are a number of ways you may seek assistance. First, you may discuss issues and concerns with your immediate supervisor, another member of Management, or a Human Resources Representative. If necessary, you should address your problem or concerns with the next level of management, continuing up to the highest levels of management through the chain of command or utilize the existing "Positive Approach to Sharing Concerns / Suggestions" outlined in our employee handbook "Communities Connected for Kids...And You". If for any reason you are uncomfortable communicating a problem or concern through these channels, you may contact CCK's Director of Quality Assurance Rusty Kline or CEO Carol DeLoach at 772-873-7800. In accordance with our Non-Retaliation policy, no retaliatory action will be taken against you for reporting a concern.

Your support of the program is essential to its success! I appreciate your hard work and dedication in meeting the needs of our clients and the communities we serve and urge your continuous support of our *Standards of Conduct*.

Sincerely,



Carol DeLoach
Chief Executive Officer
Communities Connected for Kids

OUR VISION, MISSION, AND CORE VALUES

Mission, Vision & Values

Mission

Our mission is to enhance the safety, permanency and well-being for all children in Okeechobee and the Treasure Coast through a community network of family support services.

Vision

We envision a community without abuse, neglect and abandonment so all children grow to their full potential.

CORE VALUES

Communities Connected for Kids values are:

We are accountable to the children and families we serve and to the communities in which we live. We ensure services provided are:

- Individualized, based on the strengths and needs of the families we serve
- Respectful and culturally sensitive
- Effective and accountable
- Evidence based and data driven
- Permanency focused
- Ensure financial and human resources are managed and maximized

INTRODUCTION TO THE *STANDARDS OF CONDUCT*

CCK's *Standards of Conduct* originate from our Vision, Mission and Values relating to:

**QUALITY OF SERVICE & CARE
LEGAL COMPLIANCE
CONFLICTS OF INTEREST
PROTECTION OF ASSETS
HUMAN RESOURCES
COMMUNICATION**

The establishment of standards helps ensure that all employees and independent contractors of CCK and its affiliated entities have a clear understanding of the business, professional, legal and personal ethics that are expected in the workplace. The information contained in this booklet should be used as a resource to guide you in handling both routine and difficult circumstances that we may face in our daily activities.

The *Standards of Conduct* cannot, and do not, cover every situation you may face. Also, you will notice that many of the principles discussed relate to established organization policies and procedures.

QUALITY OF SERVICE & CARE

CCK is committed to providing high quality of care and delivering services that are individualized, effective, accountable, and focus on positive approaches. As CCK employees and independent contractors, we are required to report any actual or perceived quality of care issues to Management, Human Resources, the Director of Quality Management or CEO.

- ◇ We will provide high quality services to all clients without discrimination based on their gender, age, disability, race, color, religion, national origin, marital status or sexual orientation.
- ◇ We will respect clients' right to know the identity and qualifications of all CCK personnel who provide services for them.
- ◇ We will respect our clients' right to confidentiality.
- ◇ We will employ only personnel with proper credentials, experience and expertise in meeting the needs of our client population.
- ◇ We will ensure that all in-house training meets or exceeds the minimum standards of our profession.

We will ensure that punitive action, emotional or physical abuse, or other abusive treatments are not tolerated.

LEGAL COMPLIANCE

CCK will operate in accordance with all applicable federal and state statutes, regulations, guidelines and professional standards in order to maintain the integrity of our organization. As CCK employees and independent contractors, we have a duty to report any actual or perceived violation of applicable laws, regulations or professional standards to Management, Human Resources, the Director of Quality Management or CEO.

Failure to comply with all statutes, regulations, and guidelines applicable to Federal and State programs and with CCK's own policies and procedures or failure to report such non-compliance is grounds for disciplinary action up to and including termination.

Prevention of Fraud, Waste and Abuse

In compliance with the Deficit Reduction Act of 2005, CCK has adopted Compliance Policy #1509 Prevention of Fraud, Waste, & Abuse. This policy provides detailed information regarding the federal False Claims Act and similar state laws, sets forth the right of individuals to be protected from retaliation for their good faith reporting of violations, and describes the CCK procedures for detecting and preventing fraud, waste and abuse. Please see this policy for full information.

CCK employees and independent contractors who have knowledge or concerns regarding a potential false claim have a duty to promptly inform Management, Human Resources, the Director of Quality Management or the CEO.

CCK will report any employee or independent contractor who is determined to have committed fraud against the organization to the applicable state agency and/or Florida Certification Board.

Client Records

- ◇ We will maintain complete and accurate client records.
- ◇ We will ensure that all client records and related information, including the fact that a person is a client of CCK, adhere to applicable Federal, State and CCK laws and policies regarding confidentiality.

Billing and Cost Reports

- ◇ The submission of any claim for payment or reimbursement to any party that is false, fraudulent, knowingly inaccurate, or fictitious is strictly prohibited.
- ◇ We will only submit claims for payment or reimbursement for services actually rendered and appropriately documented in clients' using billing codes and/or descriptions applicable to the services provided.

- ◇ We will take immediate steps to alert appropriate CCK management personnel if inaccuracies are discovered in our cost reports or in claims submitted for payment or reimbursement.

Client Referrals

- ◇ We will not solicit or receive, or offer to give or give, anything of value, whether in the form of cash, loans, goods, or services, to any actual or potential referral source for the referral of clients or services. Kickbacks, bribes, rebates or any kind of benefit intended to induce referrals or the recommendation of our services are strictly prohibited.

Environmental Laws

- ◇ We will promote appropriate environmental and safety practices to ensure compliance with all relevant laws and regulations.

HIPAA Compliance (Health Insurance Portability & Accountability Act)

As part of our commitment to provide high quality care for our clients, CCK has consistently upheld the importance of maintaining client privacy and confidentiality. All employees and independent contractors as well as CCK volunteers sign a written acknowledgement of this commitment as part of the hiring process.

In April 2003, a new federal law went into effect that guarantees the privacy of health information for all clients and employees. The Health Insurance Portability and Accountability Act or HIPAA gives individuals a right to gain access to their records (where deemed appropriate) and to request amendments to their health information. It requires that all health care providers and payers use a standard format for common transactions, such as submitting an insurance claim. It also limits the way that CCK uses or shares Protected Health Information or PHI. Finally, HIPAA mandates sanctions or consequences for violating HIPAA privacy and security guidelines, including possible fines. CCK has updated its policies and procedures to reflect both the revised 2009 HIPAA (HITECH) requirements and the 2013 HIPAA Omnibus requirements that include a revised Notice of Privacy Practices, guidance on Research Authorizations and Guidance on Use of Client PHI for fundraising. These are contained in the 1500 series of CCK Policies and Procedures.

CCK is committed to adhering to all federal and state laws and regulations, including HIPAA. To insure compliance, CCK requires that all employees receive training in HIPAA privacy and security regulations in conjunction with DCF required training. Initial training is completed within two weeks of beginning employment. Annual DCF refresher training also includes HIPAA training.

CCK has designated a Privacy Officer and a Security Officer, who are responsible for insuring that systems are in place to meet the privacy and security requirements of HIPAA.

In addition, CCK has designated a HIPAA Compliance Officer, who works to insure full compliance with state and federal laws as well as related CCK policies and systems.

As with any compliance issue, if you have a problem or concern related to the privacy or security of client records, you should utilize the problem resolution process.

Specifically:

1. Clarify your problem or concern
 2. Have a discussion with your supervisor or Human Resources
 3. Raise your concern with the next level of management or with Designated HIPAA Officer (Director of Quality Management)
- If for any reason you are uncomfortable communicating a problem or concern through these channels, contact the CCK CEO at 772-873-7800.

HIPAA privacy and security regulations and CCK Compliance policy #1507 Non-Retaliation require that any workforce member who in good faith reports a breach of privacy or security of protected health information will be protected from intimidation or retaliation. Any breach of privacy or security of PHI must immediately be reported utilizing the process identified above. An incident report must be completed for any Protected Health Information (PHI) breaches. In addition, the person who becomes aware of the breach will also complete the online reporting form to the Office of the Inspector General.

CONFLICTS OF INTEREST

All CCK employees and independent contractors will take all reasonable steps to avoid conflicts, or the appearance of conflicts, between their personal interests and their official responsibilities and performance of their duties. As CCK employees and independent contractors, we have a duty to report any actual or perceived conflicts of interest to Management, Human Resources, the Director of Quality Management or the CEO of CCK.

In general

- ◇ We will avoid all situations that may create an actual conflict, or the appearance of a conflict of interest. Every employee and independent contractor has a duty to disclose any potential conflict of interest, which will then be reviewed by appropriate management.
- ◇ We will act in a manner that does not conflict with the best interests of CCK. We will never use our position or confidential information for our own personal gain.
- ◇ We will refrain from hiring relatives of existing employees or independent contractors in a position that may create a conflict of interest (such as a direct reporting relationship).
- ◇ We will compensate providers and vendors at fair market value. Every payment must be supported by proper documentation confirming that the goods and services were received.

Outside Employment

- ◇ We will not prohibit employees from holding other jobs. However, every employee has a duty to disclose any outside employment, including elected positions, to his/her supervisor regardless of whether any potential conflict of interest is perceived. If the outside employment causes performance problems in the employee's work at CCK, management may require that such outside employment be discontinued.
- ◇ We will not serve as a trustee or director of or have a financial interest in or a business relationship with, another organization that might result in any conflict with the purposes, aims or goals of CCK, unless approved in advance by appropriate Management.

Gifts

- ◇ We will not request or accept personal gifts, favors, loans, unpaid services or other types of gratuities or hospitality from organizations doing business with CCK, competitors of CCK, co-workers, clients, and families of clients or referral sources. No monetary gift of any amount is acceptable. However, the acceptance of an occasional gift or entertainment of nominal value which would not be reasonably expected to create a corrupting influence is acceptable. If an employee or independent contractor has any doubt as to the appropriateness of a gift, he or she should seek guidance from Management, Human Resources, the Director of Quality Management or the CEO.

PROTECTION OF ASSETS

CCK is committed to protecting the organization's assets, and the assets of others entrusted to us, including physical property, funds and proprietary information, against loss, theft, or misuse. As CCK employees and independent contractors, we have a duty to report any actual or perceived loss, theft or misuse of CCK property or the assets of others to Management, Human Resources, the Director of Quality Management or the CCK CEO.

- ◇ We are personally responsible and accountable for the proper expenditure of CCK funds and for the proper use of the organization's property.
- ◇ We will obtain approval from authorized management prior to the commitment or expenditure of any CCK funds.
- ◇ We will follow generally accepted accounting principles, established finance procedures and internal control procedures in handling and recording all funds and property.
- ◇ We have a duty to preserve CCK's assets, funds, property, facilities, equipment and supplies.
- ◇ We have a duty to safeguard the property of clients and employees.
- ◇ We will dispose of surplus, obsolete or condemned property in accordance with CCK policies and procedures. Unauthorized disposal of property is a misuse of assets.
- ◇ We have a clear obligation to use our time productively while at CCK.

- ◇ We do not use CCK funds, property or services to support or oppose the election of any candidate for public office. We will participate in lobbying efforts in an attempt to influence legislation as permitted under federal and state law.

HUMAN RESOURCES

CCK is committed to protecting and supporting all employees and independent contractors as well as helping them to achieve their fullest potential in a fair and equitable manner. As CCK employees and independent contractors, we have a duty to report any mistreatment, discrimination, safety issue, hostile work environment, legal violation or other compliance issue occurring in the workplace to Management, Human Resources, the Director of Quality Management or the CCK CEO.

Our Responsibilities

- ◇ We will not tolerate any form of physical, verbal, or psychological abuse or sexual harassment. Sexual harassment includes unsolicited or unwelcome sexual advances, requests or demands for sexual favors, or any verbal, physical or visual conduct of a sexual nature, which might create a hostile work environment. This type of behavior is not only unacceptable; it is also illegal. CCK maintains a zero-tolerance policy for any form of sexual harassment.
- ◇ We will not tolerate any form of workplace harassment of one employee by another employee or supervisor on any basis, including but not limited to, race, religion, gender, color, age, physical or mental disability, national origin, veteran status, marital status, gender identity and expression, sexual orientation, citizenship or any other category protected by law. Workplace harassment includes, but is not limited to, slurs, epithets, threats, derogatory comments, unwelcome jokes, bullying and teasing. Bullying can take a number of forms, including, but not limited to, verbal abuse, offensive conduct or behavior that is threatening, humiliating, or intimidating, work interference, or sabotage, which prevents an employee from accomplishing what needs to be done. CCK maintains a zero-tolerance policy for any form of workplace harassment.
- ◇ We will conform to the standards of our professions and use reasonable judgment and objectivity in the performance of our duties.
- ◇ We will show respect for our clients and co-workers by notifying our supervisor in advance if we are unable to report for work as scheduled, or to carry out our duties as our position requires.

Public Relations

CCK's reputation has been built on excellent service and quality work since its inception. Maintaining this reputation requires the active participation of every employee.

- ◇ Employees are expected to interact in a courteous, friendly, and sensitive manner with all those persons associated with CCK including co-workers, families, agencies, community service providers, our community neighbors, and others.
- ◇ Likewise, an employee is expected to act appropriately outside the workplace and within the law, so as not to damage or cause harm to CCK's reputation.

Equal Employment Opportunities

We will ensure that everyone is afforded equal employment and advancement opportunities without regard to race, religion, gender, color, age, physical or mental disability, national origin, veteran status, marital status, gender identity and expression, sexual orientation, citizenship, or any other category protected by law.

- ◇ We will ensure that everyone is equitably compensated for comparable work without regard to race, religion, gender, color, age, physical or mental disability, national origin, veteran status, marital status, gender identity and expression, sexual orientation, citizenship, or any other category protected by law regardless of gender, age, disability, race, color, religion, national origin, marital status, gender identity or expression, or sexual orientation.

Job Performance Feedback and Training

- ◇ We will give appropriate feedback and recognition on job performance. Further, we will support learning and training opportunities for staff appropriate to an employee's role or career path. We will provide opportunities for staff to develop and enhance their workplace skills through orientation, training, on-the-job learning, and on-line courses or webinars.
- ◇ Employees are responsible for completing annual training hours and necessary refreshers / re-certifications in required courses in accordance with policies and procedures, as well as applicable state and federal regulations.
- ◇ Employees are also responsible for conducting themselves in a legal and ethical manner both during training and testing as well as after, when they are expected to apply the skills taught. Failure to do either could result in disciplinary action or termination for cause.
- ◇ Finally, employees are expected to perform their duties in accordance with their job profile and expectations of their supervisor and management. Failure to do so may result in coaching, re-training, corrective action or performance plan, and/or disciplinary action or termination for cause.

Health & Safety

- ◇ We will comply with all work and safety rules, regulations and policies.
- ◇ We will take reasonable precautions to ensure our own safety as well as the safety of clients, visitors and other personnel.

- ◇ We will maintain and annually communicate our emergency plans and procedures to employees, DCF, and clients.
- ◇ We will practice safety awareness by thinking defensively, anticipating potential hazards and reporting unsafe conditions immediately, consistent with the expectations of our Safety program.
- ◇ We will not tolerate violence in the workplace including: any form of physical, verbal, or psychological abuse, direct or implied threats, stalking, threatening phone calls, harassment, domestic violence, any form of physical aggression, or sexual harassment toward clients, employees or independent contractors. Employee on client violence is not permitted and we exercise a zero-tolerance policy toward it. Client on employee assaults, although possible given the services being provided, are not acceptable. CCK reserves the right to take appropriate and lawful actions to enforce our Workplace Violence Policy #1230. Workplace violence includes, but is not limited to any threat of or actual act of physical violence; threat of or actual damage to property; or physical or emotional harassment, bullying or intimidation, or other threatening, disruptive behavior that occurs in the workplace. Any threats or acts of workplace violence should be reported immediately.
- ◇ We will promote a smoke-free work environment.
- ◇ We will promote an environment that is drug and alcohol free. The illegal possession, distribution, use, sale or abuse of controlled chemical substances or alcohol while on company business or on company premises is strictly prohibited.

COMMUNICATION

CCK will promote an environment that encourages open communication. Open communication among all personnel is the foundation of the compliance program. Without open and meaningful communication, our compliance efforts will not succeed. As CCK employees and independent contractors, we have a duty to report any communication problem to Management, Human Resources, the Director of Quality Management or the CCK CEO.

Organization Communication

- ◇ We will be responsible for sharing ideas, resolving problems or concerns and treating all opinions with respect and consideration.
- ◇ We will raise legitimate questions or concerns in an appropriate and efficient manner.
- ◇ We will strive to understand the duties, responsibilities and challenges that face our fellow employees.

- ◇ We will encourage employees to participate in conferences and professional meetings that directly relate to program needs.

Client Communication

- ◇ We will inform clients and, where appropriate, their family members or legal guardians of key aspects of their case plan, care and treatment. Informed consent includes full disclosure of potential risks, side effects, and benefits of proposed medications.
- ◇ We will respect our clients' right to receive information regarding CCK's policies, procedures and changes.
- ◇ We will promptly and courteously answer all questions from clients, or refer them to the proper resource, or their family members.
- ◇ We will respect the right of clients and their families to participate in decisions regarding their care and treatment, including the refusal of treatment to the extent permitted by law, and to be informed of the consequences of such action.

CODE OF ETHICS FOR SENIOR MANAGEMENT

CCK has developed and approved the following Code of Ethics for Senior Managers and Board of Directors consistent with the Sarbanes-Oxley Act of 2002:

Communities Connected for Kids

Code of Ethics for Senior Management

The Sarbanes-Oxley Act of 2002 effectively requires the adoption of a Code of Business Ethics applicable to Senior Management including the CEO, COO, CFO, all Officers of the Company, Directors, and the Board of Directors. The Code of Ethics establishes standards that are necessary to promote honest and ethical conduct; the avoidance of conflicts of interest; full, fair, accurate, timely and understandable disclosure in periodic reports; and compliance with applicable federal and state governmental rules and regulations.

CCK is committed to conducting business ethically and in conformance with all applicable laws, regulations and standards. In support of this commitment, all CCK Officers, Senior Management including the Chief Executive Officer, Chief Operating Officer, Chief Financial Officer, Directors, and Board of Directors shall adhere to the following standards:

- Honest and ethical conduct, including the ethical handling of actual or perceived conflicts of interest with the business activities of CCK. It is the responsibility of management and Board members to ensure that duties are conducted solely in the best interests of CCK, without consideration of the interests of any other entity, familial or otherwise, and to refrain from taking part in any transaction that is not in good faith or the best interest of the Company.
- Provide ethical leadership to the organization and assure that adequate systems are in place to facilitate ethical and legal conduct.
- Full, fair, accurate, timely and understandable disclosure in all reports and documents.
- Compliance with applicable federal and state governmental laws, rules and regulations to ensure the prevention of fraud and abuse.
- Prompt internal reporting of violations of the Code of Ethics to the Director of Quality Management or the CEO or to other persons identified in this Code of Ethics.
- Accountability for adherence to this Code of Ethics.

This Code of Ethics shall be provided to all existing and new senior managers and Board of Directors in the titles identified above.

YOUR RESPONSIBILITIES

Maintaining high standards of ethical and moral conduct is in everyone's best interest. As such you are responsible for:

- Acting in accordance with CCK's *Standards of Conduct*.
- Becoming familiar with relevant laws and regulations that apply to your day-to-day responsibilities.
- Asking questions of your supervisor when you have doubts about the ethical, legal or moral implications of a situation.
- Reporting violations of the law, regulations or CCK's *Standards of Conduct*.

If you manage or supervise others, you also have a responsibility to:

- Respect diverse opinions.
- Maintain an open-door policy and listen to issues that are raised.
- Respond to questions and problems in a timely manner.
- Assist subordinates in understanding their rights and obligations under law, regulation and the *Standards of Conduct*.

OUR PROBLEM RESOLUTION PROCESS

1. Clarify your problem or concern
2. Have a discussion with your supervisor or Human Resources
3. Raise your problem or concern with the next level of management continuing up the chain of command if necessary (see Policy/Procedure #1231 for details on the CCK "Positive Approach to Sharing Concerns and Suggestions")

* If for any reason you are uncomfortable communicating a problem or concern

through these channels, contact the Director of Quality Management or the CEO.

OUR PROMISE

(Non-Retaliation Policy # 1507)

CCK will not take any disciplinary action or other type of retaliation against any employee or independent contractor who in good faith reports a concern, issue, or problem to Management, Human Resources, the Director of Quality Management or the CEO.

Intentionally making a false accusation is a serious violation of CCK policy and may lead to disciplinary action up to and including termination.

Any employee or independent contractor who believes that he or she has suffered retaliation for making a report should contact Management, Human Resources, the Director of Quality Management or the CEO.

CCK is committed to insuring that employees and independent contractors feel safe raising concerns or questions in the spirit of the *Standards of Conduct*.

Please refer to the CCK Intranet for a complete listing of all policies and procedures.