



Early Autism Services

Code of Conduct

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Code of Conduct

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Dear Workforce Members,

Early Autism Services (EAS) is committed to providing individualized home-based Applied Behavior Analysis (ABA) therapy for children with autism and their families. We have over a decade of experience developing and implementing effective, high-quality ABA programs and pride ourselves on our longstanding reputation for obtaining results. We have built relationships of trust among ourselves and with our clients, and much of our success can be directly attributed to our workforce members and our integrity. These relationships are vital to our continued success and fulfillment of our goal to provide high quality behavioral therapy to all children with special needs. The EAS *Code of Conduct (Code)* aligns with our mission, goals, and objectives and ensures a safe, law-abiding, ethical and productive business.

Our business, which demands strict adherence to rules and laws, is being made more complex by our desire to continue providing our clients with ever-increasing levels of quality and performance. Those with whom we do business expect and deserve nothing less than the highest level of ethical business practices from us and each of our workforce members. Our success involves the active participation of every individual associated with our organization. In general, the use of good judgment, based on high ethical principles, will guide you with respect to lines of acceptable conduct. We encourage an open and honest atmosphere in which any problem, complaint, suggestion, or question receives a timely response from the organization's supervisors and management. If you know or suspect that a law, regulation, policy or our *Code* is not being followed, you must report this information. To further assist you in carrying out your compliance responsibilities, we have designated a HIPAA Compliance Officer and established a toll-free and confidential *HIPAA Compliance Hotline* and website. Reports can be made anonymously, and we can assure you that EAS will not tolerate retaliation for reporting in good faith any items of concern to management, the Human Resources Manager, the HIPAA Compliance Officer, or the *HIPAA Compliance Hotline*.

Our managers and leaders pledge our full commitment to upholding the *Code*. Together, we can fulfill our commitment to maintain a positive and compliant work environment and conduct our business activities adhering to the highest standards of business ethics and integrity.

Sincerely,

Ben Wessels, *CEO, Early Autism Services*

INTRODUCTION TO THE CODE OF CONDUCT (“CODE”)

Early Autism Services (EAS) is committed to performing our business in an ethical, legal, and responsible manner in full compliance with all applicable laws, regulations and guidelines, as well as our own policies and procedures. To assist in meeting these objectives, we have developed this Code of Conduct (Code) as written guidance on what is expected of everyone in our work environment. The Code must be observed by all workforce members and affected parties, including anyone engaged in our work environment or acting on behalf of the organization. No one, regardless of position, will be allowed to compromise adherence to the Code, regulations, business standards, policies, or procedures. Failure to comply can result in serious damage to our standing in the community, regulatory action against us or individual workforce members, and workforce member disciplinary action up to and including immediate termination.

If you have any questions about this Code or about any of our policies or practices, you should raise the questions with a member of management or the HIPAA Compliance Officer. Supervisors and managers have been charged with a special obligation to be available and responsive to workforce members when questions arise about adherence to the Code. If you are not satisfied with the response received from the management staff concerning applications of the Code, policies, or procedures, you may continue raising your concerns to the highest level of management.

The Code has been adopted as a set of principles to guide our workforce members in their conduct in the workplace. Being aware of these principles should enable workforce members to identify and report potential problems to management so that these matters may be properly assessed and resolved. The Code is a “living document,” which will be updated periodically to respond to changing conditions. Thus, EAS reserves the right to modify the Code at any time.

MISSION AND OBJECTIVES

MISSION:

Early Autism Services'(EAS) mission is to serve the needs of developmentally delayed and other special populations. We foster a nurturing and individualized learning environment for young children by using scientifically proven methods and procedures to obtain learning goals and objectives. We work with each child to reach their full potential in every area of development. EAS' team of highly trained, caring professionals focus on providing the highest quality treatment, and maintaining a culture of accountability and support.

EAS has over a decade of experience developing and implementing effective, high-quality Applied Behavioral Analysis (ABA) programs. Our programs draw on this expertise, while also relying on the ever-growing body of research surrounding effective autism treatment. Our Core Purpose is to make available high-quality behavioral therapy to all children with special needs while adhering to our core values.

VALUES:

Our four core values are:

1.	Make decisions empirically at all levels
2.	Be accessible and supportive
3.	Respect the individual
4.	Grow alongside both the client and staff

Quality of Care and Service

We are committed to providing high quality care and services to our clients and their families

- > We will employ only properly licensed and credentialed professionals with the proper experience and expertise to carry out their duties.
- > We will identify individual client needs and requirements and take actions reasonably necessary to provide high-quality services.
- > We will listen to and acknowledge our clients and their families concerns.
- > We will treat everyone with dignity, respect, and compassion at all times.
- > We will not discriminate against anyone with whom we deal on the basis of race, color, national origin, gender, age, marital status, religion, disability, sexual orientation, pregnancy, genetic conditions or predispositions, or certain military and veteran status, or other areas protected by law.
- > We will act in an open and honest manner with our clients.
- > We will maintain the confidentiality, integrity, and security of protected health information and obey all laws and professional standards.
- > We will provide training on the Code of Conduct to all workforce members.

Health and Safety in the Workplace

We are committed to providing a healthy, safe and secure work environment

- > We will comply with all safety and health requirements whether established by Early Autism Services, or federal, state, or local laws.
- > We will comply with our work and safety rules to protect the well-being of our workforce members and clients we treat to ensure a safe working environment.
- > We will expect that you understand how these requirements apply to your specific job responsibilities and seek advice from your manager or the HIPAA Compliance Officer whenever you have a question or concern.
- > We will follow emergency and safety plans and procedures.
- > We will promptly notify a member of management if an accident involving a personal injury occurs, regardless of its severity.
- > We will identify client care issues and promptly report any possible violation of the organization's safety policies and procedures, laws, regulations or standards to a manager or the HIPAA Compliance Officer.
- > We will provide information to workforce members about workplace safety and health issues through regular internal communication channels to reduce hazards to health and safety.
- > We will not tolerate any workplace violence, including threats, harassment, bullying toward any individual, or the illegal possession of weapons in the workplace.
- > We will not permit the manufacture, distribution, dispensation, possession, concealment, use, sale or transfer of alcohol or illegal drugs, and the possession and/or purchase of drug related paraphernalia while working on Company premises, Company time or while operating Company equipment (including vehicles).
- > We will not report to work while under the influence of alcohol or illegal drugs.

Compliance with Laws and Regulations

We are committed to conducting business in an ethical and competent manner, and will continuously promote compliance with laws and regulations

- > We will conduct our business ethically and competently and in compliance with all applicable laws and regulations. We will refrain from any illegal, dishonest, or unethical conduct.
- > We will promptly report to a member of management, the HIPAA Compliance Officer, or the HIPAA Compliance Hotline whenever a potential or suspected violation of law, regulation or policy has occurred. All compliance issues or reported concerns will be acted upon in a fair and truthful manner.
- > We will not tolerate any retaliation or other negative action against a workforce member who reports, in good faith, a suspected violation or behavior that undermines a culture of teamwork, safety, professionalism and compliance.
- > We will ensure that workforce members are adequately trained on Federal and State regulations pertaining to their job functions.
- > We will expect all workforce members to be familiar with applicable laws, regulations, and policies governing their areas of responsibilities.
- > We will not provide or accept money or anything of value in order to influence the referral of clients or services.
- > We will not pursue business opportunities that require unethical or illegal activity.
- > We will ensure that all contracts with individuals or organizations that may be a possible referral source are in writing and approved by appropriate management after review by legal counsel.

Compliance with Laws and Regulations

We are committed to conducting business in an ethical and competent manner, and will continuously promote compliance with laws and regulations

- > We will not hire or contract with individuals who have been sanctioned (excluded from participation) by the HHS Office of Inspector General (OIG), state or professional licensing agencies, or State Medicaid agencies, or barred from Federal procurement programs.
- > We will ensure that marketing, advertising and sales communication, both oral and written, is clear, correct, non-deceptive, and compliant with patient privacy regulations contained in the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and Final Omnibus Rule.
- > We will maintain complete and accurate client medical records, and as necessary retain such records to support our billed services and health care operations, and keep all such information confidential and available as required.

Billing, Coding and Records Integrity

We are committed to the highest quality of healthcare billing, coding and reimbursement management, and sound ethical business practices

- > We will maintain timely and accurate patient records and code and bill only for services actually delivered as documented in the client's medical record.
- > We will be accurate and truthful in billing and not misrepresent charges.
- > We will ensure claims submitted for payment are properly coded, documented, and billed in accordance with all applicable laws and regulations.
- > We will promptly alert the payor, correct any errors in billing, and appropriately refund any money, as inaccuracies are found.
- > We will not knowingly submit for payment or reimbursement a claim we know to be false, fraudulent or fictitious.
- > We will periodically review coding practices to ensure they are consistent with all applicable Federal, State and private payor healthcare program requirements.
- > We will periodically review bills, reimbursements, and medical records to ensure compliance with applicable billing, coding and documentation requirements, and investigate any inaccurate billings and payments.
- > We will regularly monitor our records for credit balances and will promptly refund any overpayments, and report and refund any overpayments made by Federal health care programs within 60 days.
- > We will not waive insurance co-payments or deductibles except as permitted under applicable laws, regulations or contractual requirements.
- > We will not alter or prematurely destroy any document in response to, or in anticipation of a request for those documents by any government agency or court.
- > We will respond to all questions and complaints related to a client's bill or inquiry in a direct and honest manner.
- > We will retain medical documentation and billing records in a manner consistent with applicable laws and regulations, including HIPAA standards.

Human Resources

We are committed to creating a professional work environment where workforce members are treated with dignity, respect and fairness

- > We will provide a work environment that prohibits all forms of discrimination and unlawful harassment of any workforce member based upon race, color, national origin, gender, age, marital status, religion, disability, sexual orientation, pregnancy, genetic conditions or predispositions, certain military and veteran status, or any other factor.
- > We will not tolerate any form of sexual harassment, whether verbal, physical or environmental.
- > We will make all employment and promotion decisions without regard to race, color, religion, sex, age, disability, national origin, veteran status, family status, or any other factor.
- > We will review and evaluate each workforce member's performance periodically in an objective, consistent, and uniform manner.
- > We will continually strive to build confidence and professionalism in every workforce member.
- > We will work to maintain open lines of communication so that the views of each workforce member may be considered and their opinions given proper respect.
- > We will apply the Code and policies equally to all workforce members regardless of position in the workplace.
- > We will provide reasonable training opportunities to assist workforce members to build and maintain professional skills.
- > We will keep information confidential regarding current and former workforce members, including information related to salary, performance, medical history, current health status, finances, and other information contained in personnel files.
- > We will treat each other with mutual respect, regardless of status or position, and encourage workforce members to offer positive and constructive criticism.
- > We will conform to the standards of our profession and exercise judgment and objectivity in the performance of our duties.

Protection and Use of Information, Property, and Assets

We are committed to protecting EAS property and information from loss, theft, and destruction, as well as improper use or disclosure

- > We will correctly use, protect, and maintain all property and equipment entrusted to us.
- > We will safeguard confidential and proprietary organizational information and not use or reveal such information except in the proper performance of duties.
- > We will not permit making unauthorized copies of computer software or using unauthorized personal software on computer equipment.
- > We will not permit unauthorized use, installation, copying, or distributing of copyrighted, trademarked, or patented material.
- > We will not communicate or transfer any information or documents to any unauthorized persons.
- > We will be personally responsible and accountable for the proper expenditure of funds and for the proper use of property.
- > We will follow internal controls and procedures in handling and recording all funds and property.
- > We will disclose business information only as required in the performance of our job or as expressly authorized by a responsible supervisor.
- > We will never use or share “inside information” which is not otherwise available to the general public for any manner of direct or indirect personal gain or other improper use.
- > We will not use technology to compose, transmit, access, or receive data that contains content that could be considered discriminatory, offensive, obscene, threatening, harassing, intimidating, or disruptive to any workforce member or other person.
- > We will not use personal emails for business, unless authorized. We will not transmit protected health information in an unsecure manner or by using personal email.
- > We will report any observed misuse of property to management.
- > We will return all equipment and property the last day of employment, or sooner, if requested.

Conflicts of Interest

We are committed to avoiding conflicts of interest between the private interests of anyone and his or her work-related responsibilities

- > We will maintain unbiased relationships with actual and potential vendors and contractors.
- > We will not offer, accept or provide gifts or favors, such as meals, transportation or entertainment that might be interpreted as a conflict of interest.
- > We will not accept gifts and may never accept cash or cash equivalents in connection with our responsibilities.
- > We will exercise good faith and fair dealing in all transactions that involve our responsibilities to the organization.
- > We will not misuse our position for personal gain.
- > We will not hire or have a business relationship with a relative or family member without making it known in advance to management.
- > We will not allow relatives of current workforce members to occupy a position that will be working directly for or directly supervising their relative.
- > We will not accept outside employment that conflicts with our position or duties without making it known to our supervisor or management.
- > We will not partake in business dealings with outside businesses that result in unusual gains for those businesses, such as bribes, product bonuses, special fringe benefits, unusual price breaks, and other windfalls designed to ultimately benefit the outside business, the workforce member, or both.
- > We will require management approval for promotional plans that could be interpreted to involve unusual gain.
- > We will conduct transactions with outside vendors within the framework established and controlled by the management of Comprehensive Early Autism Services.
- > We will report the possible existence of a conflict of interest for ourselves or any other person.

Four-Step Communication and Reporting Process

If you have a question or concern about an activity being unethical, illegal, or wrong, use the following 4-step process to answer questions and report concerns. Throughout this process your identity will be kept confidential as much as possible and within the limit of the law.

1. Talk to your supervisor. They are the most familiar with the laws, regulations, and policies that relate to your work.

2. If you are uncomfortable contacting your supervisor, or if you don't receive an adequate response from them, talk to another member of the management team. You may also choose to speak with the Human Resources Manager, all team leaders and supervisors have an open-door policy regarding compliance concerns and issues.

3. If you have followed either #1 or #2 and still have questions, please contact our HIPAA Compliance Officer, Suzanne Rudy-Reed either by phone at 773-502-0806 or by email at srudy@earlyautismservices.com. She will maintain your confidence and work to resolve any issues in a fair and unbiased manner.

4. If for any reason you feel you cannot follow the above steps or want to report anonymously, call the Compliance Hotline at 1-855-252-7606 or submit a report at <https://www.complianceresource.com/hotline/>. The HIPAA Compliance Officer will address all reports made to the Compliance Hotline.

Compliance Hotline

We recognize that there are times when questions or problems cannot be addressed through the normal communication and reporting process. When this happens, you should use the Compliance Hotline. We have hired an outside professional hotline service center company to take Hotline calls and web postings, so callers who do not wish to give their names can remain anonymous. The confidential Compliance Hotline may be reached at 1-855-252-7606.

Calls to the Compliance Hotline will not be traced or recorded. You will remain anonymous, unless you choose to identify yourself. If you do give your name, your identity will be protected to the extent allowed by law. No disciplinary action or retaliation will be taken against you for reporting to the Hotline in good faith.

You may also post a complaint on the hotline service center's website at <https://www.complianceresource.com/hotline/>. All messages reported to the HIPAA Compliance Hotline will be reviewed by the HIPAA Compliance Officer and will be responded to fairly. All complaints or reports will be carefully investigated before any action is taken. The rights of all staff, including anyone who is the subject of a Hotline report, will be respected and protected. Actions taken will not be made public except as required by applicable laws or regulations.

NON-RETALIATION POLICY/DUTY TO REPORT

Workforce members have an affirmative duty to report compliance violations. No disciplinary action or retaliation will be taken against you when you report a perceived issue, problem, concern, or violation to management, the HIPAA Compliance Officer, or the Compliance Hotline "in good faith."

The "in good faith" requirement means a workforce member actually believes or perceives to be true the information reported. We value and respect the dignity of the individual; therefore, you have the right to be treated fairly and with respect and the organization must ensure that you are treated that way.

Compliance Responsibilities

RESPONSIBILITY OF ALL WORKFORCE MEMBERS

- > Everyone is to abide by all applicable laws, regulations, and policies. Anyone who knows about a violation or misconduct must report this information. If you do not report a violation, you may be subject to disciplinary action even if you were not directly involved. Reporting does not protect you from disciplinary action regarding your own performance or conduct, but telling the truth about your own actions will be considered.
- > All workforce members are expected to demonstrate and promote a commitment to ethical and legal behavior that is consistent with our values.

RESPONSIBILITY OF MANAGERS

- > Build and maintain a culture of compliance.
- > Lead by example to prevent and detect compliance risks and remedial action.
- > Implement and maintain appropriate controls to monitor compliance and mechanisms that foster the effective reporting of potential compliance issues.

RESPONSIBILITY OF BOARD OF DIRECTORS

- > Lead by example.
- > Set the mission for Early Autism Services' Compliance Program and exercise oversight of the Compliance Program.