



Code of Conduct and Provider Ethics

Behavioral Health Services staff members will adhere to the following:

- a. BHS staff members will attend the initial, mandatory orientation and the annual online Safety Fair and provide the necessary documentation to comply with the corporation's requirements.
- b. BHS staff members will not give any bribe, payment, gift, or thing of value to any person, entity, or governmental representative with whom the corporation has or is seeking a business relationship (except for gifts of nominal value which are given in the ordinary course of business).
- c. BHS employees may not receive, give, pay, promise, or offer to any NSHC vendors or suppliers anything of value to secure preferential treatment. This includes any form of gratuity to or from employees of our suppliers or members of their families.
- d. BHS employees shall not directly or indirectly authorize, pay, promise, deliver or solicit any payment, gratuity, or favor for the purpose of influencing any political official or governmental employee in the discharge of their duties.
- e. All political activities relating to NSHC/BHS shall be conducted in full compliance with applicable laws. Personnel may make direct contributions of their own money to political candidates, but these monies will not be reimbursed by the corporation.
- f. Additionally, personnel may not make political statements as representatives of NSHC/BHS; any political comments/contact made by employees are made as personal comments/contact, not professional/business-related.
- g. Personnel will have no personal or financial interest in transactions between NSHC and its vendors, suppliers, providers, or consumers.
- h. BHS employees will disclose all possible conflicts of interest.
- i. BHS employees will respect and safeguard the personal property of the person served, co-workers, and property owned by the organization.
- j. BHS employees will advocate for the person served, respect and comply with all rights afforded to the person, and treat the person with dignity and humanity.
- k. BHS employees will deliberately and professionally utilize NSHC-owned resources and funding to deliver best practices in all services. Wasteful use of resources is prohibited, including the utilization of training funds for skills never utilized, personal marketing of self or business, work-appointed computer for personal gain, and BHS-designated vehicle for personal errands. Management will utilize funds, including revenue, for purposes that advance the Mission and Values of BHS.
- l. BHS employees may not make false or misleading statements in the promotion and marketing of services and utilize published data responsibly and truthfully. Further, BHS employees may not use corporation time to market self or private business unrelated to work responsibilities.
- m. BHS clinical supervisors have responsibility to monitor appropriate boundaries in clinical supervisor relationships, and to seek consultation/supervision immediately if boundaries in supervision are difficult to manage. (Clinical supervisors shall not supervise a person with whom s/he has or has previously engaged in personally intimate or sexual relationship.)
- n. In the instance of a personal friendship, if another clinical supervisor is available, the supervision should be transferred.
- o. Any perceived or actual inappropriate boundaries between a clinical supervisor and an employee shall be reported in good faith to an immediate supervisor. (If the immediate supervisor is involved, the referral shall be made to the next level of management.)
- p. BHS staff members must maintain and promote professional boundaries with persons served; sexual relations between staff members and persons served are prohibited.
- q. BHS staff members are expected to maintain professional, ethical behavior in their professional responsibilities at all times.
- r. BHS staff members shall follow the corporate rules about fundraising or any other business-like activities and ensure that BHS leadership is aware of their plan for fund raising prior to the effort's initiation.
- s. BHS staff members will submit appropriate and approved bills/receipts for reimbursement.
- t. BHS will not engage in activities that may appear to be wasteful, abusive, or fraudulent.
- u. BHS will maintain financial records in accordance with generally accepted accounting standards.
- v. BHS will maintain confidentiality of all recipient information in accordance with 42 CFR Part 2, state regulations, and HIPAA.
- w. BHS staff members will follow safe work practices and comply with safety and health standards/regulations.
- x. Only legal and credible persons may witness the signing of documents. These include BHS employees with professional responsibility to do so and approved stakeholders and partners: State of Alaska agencies (Office of Children's Services, Division of Juvenile Justice, Department of Corrections), Level II and III emergency shelters, and medical providers. A witness to the signing of documents must serve as an objective authenticator and not coerce the signature of any individual. The witness must legibly print name and sign the document witnessed.
- y. BHS staff members will ensure that the work environment is free of discrimination or harassment due to age, race, gender, religion, disability, sexual orientation, or veteran status. Any form of sexual harassment, including the creation of a hostile working environment is completely prohibited.
- z. In the case of an ethical violation that is not listed in this description, the suspected wrong-doing shall be reported to the immediate supervisor in good faith.

Reporting of Violations:

- a. Clients and stakeholders may express concerns about ethical behaviors through the Grievance Process or directly to the BHS Administrative Director or Clinical Director.
- b. The BHS Administrative Director or Clinical Director (if the Administrative Director is the subject of concern) will take all concerns within 24 business hours of reporting to the NSHC Compliance Officer for action.
- c. The NSHC Compliance Officer will conduct all investigations at the most immediate pace allowed based on the allegation to mitigate further damage.
- d. It is NSHC's policy to promptly and thoroughly investigate reports of illegal activity or violations of this Code of Conduct. Personnel are expected to cooperate with these investigations and to not take any actions to prevent, hinder, or delay discovery in a full investigation of violations.
- e. If the illegal acts or improper conduct involves a government investigation, all NSHC employees will cooperate fully, honestly, completely and clearly in the investigation; general counsel shall provide leadership.
- f. Corporate leadership, the Compliance Officer or the BHS Administrative Director shall follow up with a report to the Division of Behavioral Health, licensing body, or governing body (if this allegation involves the Director, this report shall be made to the next level of management).