



CODE OF CONDUCT

Mission and Principles

The Mission of the Warren Washington Association for Mental Health (sometimes referred to as “WWAMH” or “the Agency”) is to improve the quality of life for those affected by mental illness and to promote the awareness and importance of mental well being in the community.

To succeed:

- We will operate in a client-centered manner with respect for the individual’s rights to self-determination and self-expression.
- We will treat individuals with respect and with recognition of their human dignity and we will strive to dismantle barriers between providers and recipients of services.
- We believe in the ability of individuals to improve and grow when positive conditions for growth are created.
- We will work in active partnership with recipients of services as well as with families and other agencies and organizations.
- We will provide services and develop environments that help mediate stress and reduce the incidence of psychiatric crisis and need for hospitalization by improving the quality of life of people in the community through meaningful treatment and community support programs.
- We will work to expand the resources available to individuals and opportunities for personal development and growth.
- We will work to educate the public and the legislators as to the legitimate needs and rights of people with psychiatric disorders or problems as well as to the real nature of mental illness, the efficiency of treatment, and the importance of mental health to society.

Intent

WWAMH’s Code of Conduct (the Code) applies to all employees, volunteers, interns, Board Members, and independent contractors.

The Code of Conduct was approved by the Agency’s Board of Directors and is a formal statement of the Agency’s commitment to the standards and rules of ethical conduct.

WWAMH is committed to preventing the occurrence of unethical or unlawful behavior, stopping such behavior as soon as possible after discovery, and to discipline employees who violate the Code, including employees who neglect to report a violation.

All employees must comply with this Code, immediately report any alleged violations of wrongdoing, and assist management and compliance personnel in investigating allegations of wrongdoing.

While these standards addressed in the Code of Conduct are intended to guide employees in the course of their day-to-day responsibilities, they do not replace any Agency or program policies and procedures. There may be instances that are not addressed by the Code of Conduct or existing policies and procedures, or activities that may conflict with these standards. Employees must seek direction from their supervisor, other Agency management staff or the Compliance Officer in these instances.

Ethics

It is the policy of WWAMH to observe all laws and regulations applicable to its business and to conduct business with the highest degree of integrity. To accomplish this, all employees and contractors must obey the laws and regulations that govern their work and always act in the best interest of the people we serve, their families and the Agency.

- You are expected to keep management staff informed of what you are doing; to document or record all services or transactions accurately; and to be honest and forthcoming with the Agency, regulatory agencies, and internal and external auditors.
- You are expected to comply with the Agency's policies and procedures, accounting rules, and internal controls.
- You are expected to function with honesty in your work for the Agency and with people we serve, providers, suppliers and all others with whom the Agency does business.

Conflict of Interest

Employees, volunteers, interns, Board Members, and contractors must not allow any outside financial interest, or competing personal interest to influence their decisions or actions taken on behalf of the Agency.

Employees, volunteers, interns, and contractors must avoid any situation where a conflict of interest exists or might appear between their personal interests and those of the Agency. The appearance of a conflict of interest may be as serious as an actual conflict of interest.

Guidelines

It is a conflict of interest for you to personally take for yourself opportunities that are discovered through the use of Agency property, information or position with the Agency; to use Agency property or information for personal gain; or to compete with the Agency.

There are many types of situations where potential conflicts may arise. You must promptly report any actual or potential conflicts of interest to your immediate supervisor or directly to the Compliance Officer.

Outside Activities and Employment

- You may not conduct outside activities during work time. Such activities interfere with your regular duties and negatively impact the quality of your work.
- You are a representative of the Agency in your every day life and must represent the Agency positively in the community. Activities during non-working hours should not discredit in any way the community perception of the Agency, or reveal personal or confidential information regarding any of the individuals the Agency provides services to. This includes social networking, via dialogue, chatting, blogging, posting pictures, etc. on internet websites.
- Outside employment must not conflict in any way with your responsibilities to the Agency or its

clients. Any outside employment requires notification of the employee's supervisor, who is thus responsible to notify the Compliance Officer. Please refer to WWAMH's "Conflict of Interest" policy for further details.

Use of Agency Funds and Resources

- The Agency's assets are to only be used for the benefit of the Agency and the people we serve. Assets include funds, equipment, inventory, and office supplies, but also concepts, business plans and strategies, information about people served, financial information, computer property rights, and other business information about the Agency.
- You may not use Agency assets for personal gain or give them to any other persons or entities, except in the ordinary course of business as part of an approved transaction.

Confidentiality

- During your employment, you may acquire confidential information about the Agency, its staff and people we serve that must be handled in strict confidence and not discussed with outsiders. The protection of confidential business, staff and consumer information is very important. Please refer to the Agency's privacy policies.

Business Dealings Between the Agency and Employees

- WWAMH will not be inappropriately influenced with goods or services from any business in which you or your immediate family members have a substantial interest.
- Property and resources of the Agency should only be used for the benefit of the Agency or the people we serve.

Maintenance of Records

Employees, volunteers, interns, and contractors must record and report all agency, consumer and financial information fully, accurately, and honestly. Records include, but are not limited to, records of the people we serve, documentation of services, accounting books or records, financial statements, timesheets or records, expense reports, vouchers, bills, payroll, claims payment records, correspondence, and any other method of communication. Employees, volunteers, interns, or contractors must not omit or conceal any relevant information.

Guidelines for Employees, Volunteers, Interns, and Contractors

Many of the Agency forms are legal documents used to prove that a service was provided, to bill for a service to a consumer, to record a job task, or to record specific happenings. You must document accurately and honestly, and only for those services that you provided or those events you were involved in.

Falsification of Records

- You must not make any false entries in any of the Agency's records or in any public record for any reason.
- You may not alter any permanent entries in the Agency's records.
- You may only approve payments or receipts on behalf of the Agency that are described in documents supporting the transaction. "Slush funds" or similar off-book accounts, where there is no accounting for receipts or expenditures on the agency books, are strictly prohibited.

- You may not create or participate in the creation of any records that are intended to mislead or to conceal anything that is improper.

Expense Records

- You must always charge expenses accurately and to the appropriate cost center or account, regardless of the financial status of the program, project, or contract, or the budget status of a particular account or line item.

Retention of Records

- The retention, disposal, or destruction of records of or pertaining to the Agency must always comply with legal and regulatory requirements and Agency policy.
- You may not destroy records pertaining to litigation or government investigations or audit without express written approval of the Compliance Officer.

Protection of Confidential Information

The Agency has developed policies and procedures to assure that the confidentiality of Agency information and information about the people we serve is protected and released only with the appropriate authorization or for lawful reasons, in addition to purposes of treatment, payment, and operations. All employees, volunteers, interns, and contractors are required to comply with WWAMH's Privacy Policy. If you have any questions concerning confidential information or the Privacy Policy, contact your immediate supervisor or the Compliance Officer.

Guidelines

- You must treat all Agency records and information as confidential.
- You may not release confidential information without the proper authorization. Confidential information includes not only information about the people that we serve and their families, but also non-public information about the Agency that may be of use to the Agency's competitors or harmful to the Agency or its clients if released.
- You must protect Agency information and avoid discussing or disclosing Agency information, purposefully or inadvertently (through casual conversation), to any unauthorized person inside or outside the Agency. Furthermore, staff may not share confidential Agency information with anyone, except where required for a legitimate business purpose.
- Agency information may not be removed from Agency property without permission from a supervisor or administrator with proper authority over the information. Ask your supervisor if you are not sure whether certain information is confidential.

Termination of Employment

- You may not use any confidential information gained from your employment with the Agency for your or another company's benefit. You may not take copies of any reports, documents, or any other property belonging to the Agency.
- Upon termination of employment with the Agency, you must return all Agency property including, but not limited to, copies of documents, notes, and other records containing confidential information; all forms of computer media; Agency ID; keys and credit cards.

Information Security

- You are responsible for properly using information stored and produced by all of the Agency’s computer systems.
- Computers, Internet access, email, or other office communications systems are intended for business-related purposes only and not for uses that may be disruptive, offensive, harassing, or harmful to others.
- Do not share your system user name or password with another person or allow another to access the computer with your password.
- All employees and contractors are required to comply with WWAMH’s “Computer and Internet Usage Policy.” If you have any questions concerning information security, contact your immediate supervisor or the Compliance Officer.

Fair Dealing

Conducting business with providers, contractors, suppliers, people we serve, and competitors may pose ethical problems. Employees and contractors are expected to deal fairly with providers, contractors, people we serve, and competitors.

The Code of Conduct and the following guidelines are intended to help you make appropriate, responsible and correct decisions in these and all matters:

Kickbacks and Rebate

- Kickbacks and rebates in cash, credit, or other forms are prohibited. They are not only unethical, but in many cases, illegal.

Gifts and Gratuities and Entertainment

- You may not solicit money, gifts, gratitude, or any other personal benefits or favors of any kind from providers, contractors, producers, accounts, or people we serve and their families.
- You must not offer or accept entertainment that is not a reasonable addition to a business relationship but is primarily intended to gain favor or to influence a business decision.

Agreements With Contractors and Vendors

The Agency must assure that any agreements with contractors and vendors clearly and accurately describe the services to be performed or items to be purchased. Performance standards, and the applicable compensation, if any, must be reasonable in amount, not be excessive in terms of industry practice and must equal the value of the services rendered.

Improper Use of Funds or Assets

Use of the Agency’s funds or assets for any improper purpose is strictly prohibited. If you are aware of or have reason to believe that funds or assets are being improperly used, you must report this immediately to your supervisor or the Compliance Officer.

Federal and State Programs

WWAMH is committed to complying with the laws and regulations that govern the federal and state programs that it administers. Policies and procedures, the Compliance Program, and this Code of Conduct are developed to provide guidance in your day-to-day work. You must abide by the policies and procedures and the standards set by the Agency.

Governmental Investigations

There may be times that WWAMH is asked to cooperate with an investigation by a federal or state governmental agency, or to respond to a request for information. A request may be formally addressed to the Agency or an individual within the Agency. Employees and contractors must report any requests for information or cooperation with an investigation to the Compliance Officer immediately.

Political Activities and Contributions

Because the Agency is a non-profit organization, it is prohibited from engaging in any political campaign activities and a “substantial” amount of lobbying.

Guidelines

- Agency funds and resources, including your work time, may not be used for political contributions or activities.
- You may not act as a representative of the Agency in any political campaign activity. In expressing your personal political views or support or opposition of a candidate for public office, it must be very clear that you are expressing your personal view, support, or opposition as an individual and not a representative of the Agency.
- Laws and regulations prohibit a “substantial” amount of lobbying. There are allowances for the Agency to advocate its position on public issues. To assure that the Agency does not violate any laws or regulations, or risk losing its tax-exempt status, you must seek prior approval from the Compliance Officer before engaging in any lobbying activities. The Compliance Officer may need to consult with legal counsel on the matter and will need to record the amount of time spent in lobbying activities.

Employment Environment

WWAMH is committed to creating a safe and professional workplace where employees and others are treated with respect and without regard to their race, sex, age, religion, national origin, color, marital status, disability, or other protected characteristics. Business integrity, teamwork, trust, and respect are the Agency’s most important values. Unlawful discrimination or harassment of any sort violates these values. All agents of the Agency (including employees, volunteers, interns, and independent contractors) must exhibit and promote respect, integrity, trust, and teamwork in the workplace and must comply with this policy prohibiting discrimination and harassment in all facets of the Agency’s work.

The physical environment in the workplace should always be maintained safe and cleanly not only for the Agency’s agents, but for also those this Agency provides services to. This would include assuring compliance with the Agency’s Safety Plan, as well as other guidelines enacted by the Agency through policy and procedure and individual programmatic guidelines.

Guidelines (Please note that the following list is not all inclusive of the policies and procedures that the Agency upholds for the Employment Environment. Please refer to the Agency’s Policy and Procedure Manual for more information.)

- All Agency agents are required to support WWAMH’s commitment to a safe and professional work environment and to demonstrate appropriate behavior in the workplace.
- All Agency agents are prohibited from joking about another employee’s race, sex, age, religion, national origin, color, marital status, disability, or other protected characteristics.
- All Agency agents are prohibited from considering someone’s race, color, religion, sex, national origin, age, disability, or other protected characteristic in making decisions about hiring, placement, assignment of duties, training, promotion, termination, compensation, benefits and other work terms.
- Sexual harassment is prohibited. Sexual harassment includes any form of unwelcome sexual advance, request for sexual favors, or other verbal or physical conduct of a sexual or sex-based nature.
- Workplace violence and harassment is prohibited among agents of the Agency, between agents of the Agency and clients of Agency services, or between agents and non-agents of the Agency during work hours or on Agency property. Although it is understood that agents of the Agency may encounter such treatment for those individuals that the Agency provides services too, the actions of such individuals is not condoned and treated as such based on the individual circumstances. Agency agents are to receive guidance from their supervisors and applicable policies and procedures in such circumstances.
- All Agency agents are responsible for understanding the Agency’s policies prohibiting discrimination, harassment, including sexual harassment and workplace violence. You should consult with an appropriate supervisor or administrator if you have questions about your right to a workplace free from unlawful harassment, discrimination, or violence, or if you have questions about your duty to avoid such.
- As the Agency functions as a “Drug Free Workplace” environment, all Agency agents are responsible and expected to adhere to such defined policies, and promote such adherence from clients of Agency services. Violations of such policies by Agency agents will be handled on a case by case basis and discipline will be instituted up to and including termination. Violations by clients of service will be referred to the client’s program administration for appropriate follow up.

Seeking Guidance and Reporting Violations

Employees, and contractors must report any actual or suspected violations of this Code of Conduct, any applicable law or regulation, or any Agency policy and procedure to their immediate supervisor or the Compliance Officer. A compliance hotline, TBG Fraud and Abuse Hotline is also available for confidential or anonymous reporting of such issues. The number is, toll free, 1-866-219-1122.

When an actual or suspected violation of this Code of Conduct, any applicable law or regulation, or any Agency policy and procedure is reported to any Agency employee, it must be promptly referred to the Compliance Officer. Steps will be taken to protect confidentiality and anonymity, when appropriate and warranted. The Agency will not tolerate any form of retaliation against a person who makes a good-faith report in accordance with this Code of Conduct.

All employees, volunteers, interns, and contractors must cooperate fully and honestly in any investigation into a reported violation of this Code of Conduct, any applicable law or regulation, or Agency policy, procedure, or practice.

Corrective Action and/or Discipline

Any employee, volunteer, intern, or contractor who violates or knowingly fails to report any violation of this Code of Conduct, any applicable law or regulation, or Agency policy, procedure, or practice is subject to appropriate disciplinary action, up to and including termination.

Disciplinary action may range from a warning to suspension or discharge, depending upon the nature of the incident and the relevant surrounding circumstances.

Your Responsibilities

- ✓ Attend required training, and read and understand WWAMH's Corporate Compliance Program, current Corporate Compliance Policies and Procedures, and the Code of Conduct.
- ✓ Follow the WWAMH's Code of Conduct and abide by all policies and procedures, guidelines, and Federal and State laws and regulations.
- ✓ Be alert to any situation that could violate the Agency's Code of Conduct, policies and procedures, guidelines, and/or federal and state laws and regulations.
- ✓ Promptly report any issues, concerns, violations or suspected violations to your supervisor, the Compliance Officer, or the Chief Executive Officer.