

Code of Conduct

Updated November 2019

The Children's Institute

Amazing Kids. Amazing Place.



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Introduction

Dear team members, agents, independent contractors, and others we do business with at The Children's Institute of Pittsburgh:

The Children's Institute of Pittsburgh ("CI") places the utmost importance on our obligation to comply with all applicable state and federal laws in all aspects of our operations. This Code of Conduct ("Code") is designed to help CI comply with those guidelines and is embraced and supported by our Board of Directors ("Board") and senior leadership.

In response to increased sensitivity in the health care, social service, and education areas regarding compliance with such laws, the Board and senior leadership have adopted this Code. The Code has been designed to emphasize to all team members (and to agents, independent contractors, and others who interact with CI) the importance placed on maintaining very high ethical standards and compliance with all applicable laws. In addition to containing generally applicable standards and procedures, the Code is tailored to address specific issues of particular importance to the work of CI. Because an effective compliance program is a dynamic process, this document may be updated from time to time to meet the unique challenges facing the industries in which CI operates.

To carry out our mission, CI relies on the integrity, ethical behavior, and compliance of each and every team member, agent, contractor, and anyone who is entrusted with CI business. This Code sets the tone and defines those standards that we strive to achieve, and everyone is expected to follow the standards and use them to guide their own conduct when working at CI and representing CI. It is the expectation of the Board and senior leadership that this Code be upheld and embraced by everyone.

While the Code cannot cover every situation, it does provide broad guidelines, which are reinforced in greater detail by other policies and procedures. The Code places an obligation upon every team member, agent, and independent contractor to report any violation of the expectations set forth in the Code. Concerns regarding violations of the Code may be reported directly to the CI Compliance Officer at 412.420.2193 or anonymously through the compliance hotline at 412.420.2111.

At CI, we are extremely proud of the quality of care and education we provide to our patients, students, clients and their families. The reputation we enjoy has been built upon the contributions of each team member, agent and independent contractor, and is vital to our continued success. Because we share a common goal of providing excellent service to children, I hope that you will embrace the Code, as we have, and it serves to guide your personal conduct in your work with us. Thank you for your dedication and hard work.

Sincerely,



Wendy Pardee, PhD
President and CEO

Overview

The **Code of Conduct** ("Code") established by The Children's Institute of Pittsburgh ("CI") exists as a guide for outlining the priorities of the organization related to expectations, behavior, and relationships. Options for reporting non-compliance and retaliation are also outlined.

It is expected that all employees, volunteers, and independent contractors follow the Code and behave in a legal and ethical manner. It is also the responsibility of these individuals to report any violations of the Code. At no time will individuals be forced to act illegally or unethically. Violation of the Code may result in disciplinary action up to and including termination.

To provide additional guidance, separate policies and procedures have been created to provide additional information. These policies and procedures are referenced throughout the Code, and may be accessed on the Intranet under the "Policies" section.

Compliance Team

The **Compliance Officer** is responsible for implementing a compliance program that ensures CI meets its legal, regulatory, and contractual obligations.

Mallory Anderson, Compliance & Quality Manager

man@the-institute.org | 412.420.2193

The **Privacy Officer** is responsible for preventing and investigating breaches of protected health information.

Kathy Begler, Health Information Management Director

khb@the-institute.org | 412.420.2542

The **Security Officer** is responsible for protecting and monitoring the use of electronic protected health information.

Brian Furfari, Chief Information Officer

brf@the-institute.org | 412.420.2397

Our Mission

We're on a **mission**

to
heal.

to
teach.

to
empower.

to
amaze.



Our Vision

We seek to be the lifelong partner to individuals with a disability and their families. We will position our services to reach more individuals with an array of exceptional services that cross the lifespan, advance the models of care, and establish our organization as an influential voice regarding the subjects of disability, education, family support services and behavioral health.

Our Values

Compassion:

We provide a loving, caring family-centered environment for children with special needs, their families, and each other. We advocate for children and their families.

Integrity:

We are committed to organizational and financial accountability, transparency, respect for all, and ethical practices.

Excellence:

We will be the best at our work and provide the highest quality family-centered care and services to our children, constantly striving to improve.

Innovation:

We go above and beyond the norm and will be creative in providing services and solving problems.

Teamwork and Collaboration:

We seek to collaborate and partner in all that we do. We are a team where every person is needed to provide the quality care and services for which we are known. We work together and communicate effectively.

Fun:

We will provide a positive and friendly environment.



Reporting Structure

The Children's Institute's commitment to legal and ethical conduct requires that all employees have a clear understanding of their responsibilities. If you are aware of or suspect violations of the Code, you have a duty to seek guidance or report such misconduct. CI will investigate all credible reports of potential misconduct.



Where should I report my concerns?



In the event that you feel unable to report to these persons, you have the option to leave a voicemail anonymously at the **Compliance Hotline at 412.420.2111**.

All reports of misconduct will be promptly and appropriately investigated, by either the Compliance and/or Human Resources departments. The investigation will include a follow up with the reporting staff member, if not anonymous. If misconduct is identified, corrective action and prevention of reoccurrence will be implemented.

Non-Retaliation

Retaliation occurs when an individual experiences negative actions for reporting their concerns. A manager may not fire, demote, harass or otherwise "retaliate" against an individual for filing a complaint of misconduct. CI strictly prohibits retaliation or retribution against employees for reporting or trying to resolve problems in good faith.



Who do I contact if I suspect retaliation?

Compliance Department
412.420.2193

Compliance Hotline
412.420.2111

Human Resources
412.420.2275



Our Priorities

Priority: Quality Service Delivery

CI is committed to providing services that meet the needs of the children, young people, and families served. CI treats all patients, students, clients, and caregivers with respect and dignity. CI staff evaluate the need for services on a regular basis and work with the patient, student, client and his/her family to promote sustainable outcomes.

CI strives to meet the needs of each and every patient, student, and client served. To measure progress, CI uses a variety of custom and standardized tools to measure key elements of CI programs. One such tool is the reporting of *Quality Measures* on a quarterly basis to all management staff. These measures include metrics on each program in the areas of process, outcomes, satisfaction, and turnover and can be found on the [Quality & Risk Management](#) team site.

Priority: Promote an Inclusive Environment

CI offers an inclusive environment where all patients, students, clients, employees, and caregivers are treated with respect, dignity, and fairness. CI promotes a work environment that is free from harassment, violence, and discrimination.

We are an equal opportunity work force and will not condone or tolerate any form of discrimination related to employment. This includes, but is not limited to, discrimination in recruitment, placement, training, compensation, retention, retirement, discipline, or provision of benefits. Applicants and employees are evaluated solely on their individual merit, and under no circumstances will CI discriminate against any individual on the basis of his or her race, color, national origin, religious creed, AIDS or HIV status, disability, ancestry, age, gender, sexual orientation, gender identity or expression, genetic information, marital status, union membership, veteran/military status, or any other category protected by federal, state, or local law or ordinance.

If you have concerns or observe or experience any form of harassment, violence, or discrimination, you should report the misconduct immediately to the Human Resources Department.

Priority: Confidentiality

CI is dedicated to confidentiality and expects that regulations related to confidentiality, including the Health Insurance Portability and Accountability Act and the Family Educational Rights and Privacy Act, as well as contractual obligations, are followed in all instances. All employees of CI, including contracted individuals, are obligated to maintain the confidentiality of Protected Health Information (PHI) or Personally Identifiable Information (PII) and other confidential or proprietary business information. Employees are required to follow all policies and procedures pertaining to the security of Protected Health Information/Personally Identifiable Information (PHI/PII) or other confidential information. Breaches of confidential information should be reported promptly, within 48 hours, to the Compliance and Privacy Officers.





What are CI's Confidentiality Policies?

Additional policies, located on the Intranet, which relate to the confidentiality of patient, student, or client information, include the following:

[Breach Notification Policy](#)
[De-Identification Policy](#)
[External Email Policy](#)
[HIPAA Sanctions Policy](#)
[Minimum Necessary Standard Policy](#)

CI understands that technology continues to progress and many personal devices are capable of photographing, videoing and immediately uploading data to the internet and media outlets. Please review the specific guidelines of the [Photography Policy](#) for more information.

The rules and obligations described in the [Proper Use Policy](#) apply to all users of The Children's Institute's computer network, wherever they may be located. Violations will be taken very seriously and may result in disciplinary action, including possible termination.

Priority: Promote a Safe Environment

The Children's Institute is committed to proactively reducing errors and the risk of harm to patients, students, clients, employees, volunteers, and visitors through risk management efforts. The foundation of this program is education and incident reporting. Data is reviewed for unexpected and negative trends and subsequent plans of correction are then developed. Collaborative efforts at all levels of the organization help to ensure a safe environment and minimize risk to people, property, income, and goodwill. Please review the [Risk Management Plan](#) for more information.

CI promotes a "tobacco-free" environment and does not permit smoking inside or immediately outside surrounding the facility. This includes smoking cigarettes, e-cigarettes, and/or vaping. Additionally, CI does not permit the use of illegal drugs, or abuse of controlled substances in the workplace. Employees struggling with dependencies are encouraged to seek treatment and/or rehabilitation.

Priority: Compliance with Laws and Regulations

CI complies with all applicable laws and regulations, and it shall be the responsibility of each and every employee to operate within them. If you have questions regarding the applicable laws and regulations which apply to your role, please contact the Compliance Department for more information.

CI cooperates with all government authorities, while protecting the rights of CI employees and those we serve. Investigations may occur in the form of personal visits, phone calls, or letters. Should an individual present him/herself as a government investigator, do not submit to questioning or interview and immediately contact the Administrator On-Call, Compliance Officer, or Chief Operating Officer. Please review the specific guidelines of the [Unannounced Visits by Government Representatives Policy](#) for more information.

What do I do with a subpoena?



All subpoenas and court orders should be delivered immediately to the Compliance Department. The Compliance Department will coordinate responses as needed. There are exceptions to this, and further details can be found in the [Policy on Subpoenas, Court Orders, and Other Legal Documents](#).

Priority: Accuracy

CI must properly document and fully account for all funds, assets, and transactions and promptly record them in accordance with the prescribed accounting principles.

Documentation in any record occurs during the regular course of business and contains information necessary to support claims, as required by third party agents, contractual obligations, and law. Documentation should be timely and accurate as outlined by the appropriate documentation policies for each department. Such documentation shall be preserved and retained in accordance with applicable regulations. Please review the specific guidelines in the [Record Retention Policy](#) for more information.

CI is committed to accurately billing for services rendered. It is the responsibility of employees to ensure that their work is accurate and reflective of the service(s) provided. Submission of bills or claims for payment that may be deemed false, fraudulent, or inaccurate will not be tolerated. Please review the specific guidelines of the [Fraud, Waste, and Abuse Policy](#) for more information.



What are Fraud, Waste, and Abuse?

Fraud is intentionally submitting false information to get money or a benefit.

Waste includes practices that, directly or indirectly, result in unnecessary costs, such as overusing services.

Abuse includes actions that may, directly or indirectly, result in unnecessary costs.

Please review the [Fraud, Waste, and Abuse Module](#) found on the Intranet for more information.

Whistleblowers are protected at CI to prevent and detect fraud, waste and abuse in the workplace.

Priority: Ethical Practice

All employees, including contracted individuals, agents and those in leadership roles, must make decisions that are within CI's best interest. Conflicts of interest arise when an employee's business duties are influenced, or appear to be influenced, by his/her personal interests. No employee shall undertake an activity that will, or could reasonably, have the effect of interfering with the functioning of CI. Please review the specific guidelines in the [Conflict of Interest Policy](#) for more information.

In healthcare, education, and social services, gifts pose a risk for conflict of interest or fraud and/or abuse related to anti-kickback laws and regulations. Please review the specific guidelines in the [Gift Policy](#) for more information. CI understands there are legitimate and lawful reasons to accept or provide reasonable business courtesies. Please review the specific guidelines in the [Business Courtesies Policy](#) for more information.

CI appreciates employees who publicly communicate on behalf of the organization. Employees who partake in such public representation must maintain separation between personal views and the organization's representation. It is vital that these employees are aware of approved topics, and portray thoughts and opinions that accurately represent CI. All communications with media shall be coordinated through the Institutional Advancement Department.



What are the guidelines for social media use?

Generally, employees should not engage in social media during work time or use your work email address for social media accounts. Do not share confidential information or information that violates any organizational policy or applicable laws. Please review the specific guidelines in the [Social Networking Policy](#) for more information.

Ethics Consultations

If a situation arises where an employee, patient, student, client, or caregiver expresses an ethical concern, he/she may request an ethics consult for a confidential review of the circumstances. A response to a request for an ethics consult will be provided within 72 hours of receipt. Consultation recommendations will be provided within 7-10 days of the initial request. A summary of the ethical dilemma discussed and recommendations will be provided to the concerned party requesting the ethics consult. To request an ethics consult, please email Lindsay McGuirk at LMZ@the-institute.org.