

POLICY

Bay Area Community Services (BACS) and its officers and agents have an ethical responsibility to the individuals and community it serves. Bay Area Community Services relies on its mission statement and other such guiding documents to provide a consistent, ethical framework for business, marketing, contractual relationships, service delivery, professional responsibilities, financial management and fund development, human resources, and prohibition of wrongdoing. Furthermore, BACS possesses written procedures to deal with allegations of violations of ethical codes; education on ethical codes; advocacy efforts; and corporate citizenship. Bay Area Community Services prohibits all illegal and/or unethical behavior by all its agents.

PROCEDURE

1. Bay Area Community Services designates a Corporate Compliance Officer who has a direct reporting relationship to the Board of Directors. The Corporate Compliance Officer is designated through Resolution from the Board of Directors. In the performance of their duties, the Corporate Compliance Officer has direct and unimpeded access to the Executive Director, Board of Directors, the organization's independent accounting firm, and the legal counsel of the organization.
2. The Human Resources Function operates under an ethical code of conduct and uses best practices from Human Resources professional organizations that outline the code of ethics of human resources professionals.
3. Bay Area Community Services complies with all relevant government standards and regulations including but not limited to standards set by Community Care Licensing, the State Department of Mental Health, HIPAA and other federal, state and local ordinances. BACS checks each staff against the Office of the Inspector General Exclusion list each month to ensure they are eligible to work in facilities that receive federal funding. If an individual is added to the exclusion list they are immediately terminated and given appropriate information.
4. Bay Area Community Services carefully enters into any contractual relationship and/or Business Associate Agreement so as to ensure that the agency's mission to the individuals and community it serves isn't harmed.
5. Bay Area Community Services will not compromise the quality of care. The agency does not have any relationships between the use of services and financial incentives.
6. Bay Area Community Services has Board Resolutions that appoint which legal documents may be signed by the Executive Director including Real Estate, Corporate, Contractual, and other documents. All documents that require two signatures are executed by two officers of the Corporation. Notaries are used when required by regulatory bodies.
7. Bay Area Community Services prohibits the use of grant funds for political and/or religious activities.
8. Bay Area Community Services recognizes its responsibility to protect, educate and advocate for the community. All marketing activities shall always respect the dignity and privacy rights of its consumers.
9. Bay Area Community Services will not mislead, misrepresent or knowingly misinform anyone about the scope of practices, services or any other content related to services and business practices at Bay Area Community Services.
10. Bay Area Community Services manages social media accounts and appoints the Development Director responsible for all content, content approval, and governance and oversight over all BACS social media accounts. BACS does not allow agents of BACS to post content that is in violation of laws and regulations.
11. Bay Area Community Services assures that the privacy of individuals served, through best practices review and a staff-by-staff commitment to confidentiality as outlined in the confidentiality policy and notice of privacy practices.
12. Bay Area Community Services prohibits its officers, employees, or agents from soliciting and accepting gifts or gratuities in excess of minimal value for their personal benefit. Furthermore, Bay Area Community Services prohibits its officers, employees, or agents from promoting any personal fundraising such as selling personal items, etc.
13. Bay Area Community Services will not enter into any agreement or transaction that creates a real or apparent conflict of interest between it and its officers, employees, or agents.

14. Bay Area Community Services assures that there will be no negative consequences to staff who report waste, fraud, abuse or other questionable activities as outlined in the Policy and Procedure – Fraud, Abuse, Waste and/or complaint and grievance policy.
15. Bay Area Community Services will acknowledge receipt within 48 hours to any allegation of violation of the organizational code of ethics and will start an investigatory process within 48 hours of the allegation that is conducted by the designated officer. Results of the investigation will be completed or progress review made within 30 days of the start of the investigation and the employee who lodged the allegation will be notified of the disposition of the allegation. All investigations must be completed by 60 days time. Many actions can occur after the investigation is concluded and may include Bay Area Community Services’ disciplinary process up to and including termination. When there is a Corporate Compliance matter, the Corporate Compliance Officer chairs the organization’s corporate compliance committee and serves as the primary point of contact. Further, the Corporate Compliance Officer summarizes allegations and outcomes and reports them to the Board of Directors. Annually, a summary to the Board of Directors includes summary, description of correction action, and recommendations for performance improvements.
16. Bay Area Community Services communicates its organizational code of ethics through two distinct vehicles: 1) training of policy and procedure with all new hires, officers and agents and 2) this plan located in communal areas of the agency and including procedures for reporting.

QI Administrator:  **Date:** 10/11/2013

Executive Director:  **Date:** 03/29/2013