

Meridian Behavioral Healthcare, Inc.
Employee Code of Conduct and Ethical Standards of Practice

POLICY: III.C. Human Resources Policies of the Board of Directors.

PURPOSE:

It is every employee's responsibility to ensure that Meridian Behavioral Healthcare, Inc. (Meridian or MBH) conducts business in a legal and ethical manner, consistent with federal and state statutes and regulations, as well as the ethical standards of the professions represented by Meridian staff. Each employee is responsible for his/her own conduct and for reporting violations that jeopardize the integrity or reputation of the organization.

It is the expectation that all employees with Meridian conduct themselves in a manner that is consistent with the ethical standards outlined in Florida Statutes and with Meridian policies, procedures and standards governing rights of persons we serve. Employees are to uphold these standards not only in performing their job duties, but also in situations outside Meridian which may affect Meridian or the employee's job performance. Licensed staff will abide by the ethical standards published for each professional specialty. Staff shall maintain integrity with respect to their duties as they come in contact with the persons we serve, other service providers, and the public. Staff shall faithfully discharge their duties recognizing that the interest of the persons we serve and of the public is of primary concern.

PROCEDURE:

Applicability

This procedure applies to all staff, including contractors, agents, consultants, students, and volunteers. Complaints against any staff regarding violations of this code shall be handled in accordance with Meridian's policies and procedures for complaints from persons we serve.

I. REPORTING CONFLICTS OF INTEREST, WRONGDOINGS, OR AREAS OF CONCERN

- A. Each employee has a duty to report any actual or perceived conflicts of interest and/or wrongdoings to management, Human Resources, and Risk Management through completion of the **Incident Reporting Form** (MBH Form #18 -- Procedure IV-A, Attachment A). Staff must follow the directions on the form for the completion process. (See Procedure IV-A & QIMP -- Corporate Compliance Plan). Employees aware of wrongdoing who fail to report may be subject to disciplinary action, up to and including termination.
- B. Employees also have the right to directly report any suspected wrongdoings and may do so by filing a complaint with any of the organizations responsible for compliance oversight, including the following agencies/departments: The Office of the Inspector General (OIG), the Florida Commission on Human Rights, the U.S. Department of Health and Human Services (HHS), or by contacting the Whistleblower Hotline Number at 1.800.513.5353.
- C. All employees with knowledge of suspected or confirmed wrongdoing by an employee or contractor are required to report to The Office of the Inspector General (OIG) within 2 business days of discovery in accordance with CFOP 180-4, available for review at www.myflfamilies.com/admin/publications/policies.asp.
- D. For guidance regarding what constitutes an act appropriate for reporting, see Procedure IV-A, incident and sentinel event defined and QIMP -- Corporate Compliance Plan.
 1. An employee faced with ethical dilemmas or an area of concern is to seek guidance from his/her supervisor to clarify choices and to choose appropriate corrective action. Employees and supervisors are encouraged to contact Human Resources and Risk Management for assistance.

2. The Corporate Compliance Officer (The Chief Human Resources Officer) is available to any employee seeking consultation or wishing to make an anonymous complaint. The Corporate **Compliance Hotline** is also available at **(352) 374-5600, Ext 8222**.

II. INVESTIGATING REPORTS

- A. Risk Management will immediately conduct an investigation of client related situations including, but not limited to, employee interviews, site visitations, and review of relevant documentation or electronic surveillance. Risk Management will notify Human Resources of any human resources issues related to the situation. Human Resources will conduct investigations regarding employee related situations that may require expertise in employment law.
 1. Any and all issues regarding regulatory compliance will also be reported to the Corporate Compliance Officer, who may at his/her sole discretion bring the matter to the Board of Directors.
 2. Staff will make themselves available to answer HR/Risk Management's questions or provide sworn written affidavits and will offer honest answers. Misrepresentations, evasiveness, omissions and obstruction will only hinder the investigation and may result in disciplinary action up to and including termination.
 3. HR/Risk Management will set deadlines, based upon the type of incident, for information to be provided to them and for completion of the investigation.
 4. All involved parties will be notified by HR/Risk Management, within the pre-established time frames, of the investigation findings and needed corrective action.
 5. HR/Risk Management will arrange any necessary follow-up with involved parties.
 6. Any violations of the Ethical Code of Conduct that are determined to be true and legitimate will lead to disciplinary action up to and including termination.
 7. The Human Resources Department will make the final determination on disciplinary action or termination related to compliance issues, subject to Meridian's policies and procedures.

III. CODE OF CONDUCT

- A. **GOVERNING ETHICAL PRINCIPLES:** There are 5 general principles that guide ethical conduct of professionals, including students, and supervisors in their relationships with persons they serve:

Autonomy - Under this principle, staff respect the freedom of persons we serve to choose their own services and providers, make their own choices, and control their own lives within their capacity to do so. We have an ethical obligation to decrease dependency and foster independent decision-making by persons we serve. We refrain from imposing goals, avoid being judgmental, and are accepting of different values

Non-maleficance "*do no harm*" - We must take care that our actions do not risk hurting persons we serve. We have a responsibility to avoid engaging in practices that cause harm or have the potential to result in harm.

Beneficence (*promoting wellness*) - This principle mandates that staff actively promote the growth and welfare of those they serve.

Justice (*commitment to fairness*) - Justice includes consideration of such factors as quality services, allocation of time and resources, establishment of fees, and access to services for all

persons we serve. This principle also refers to the fair treatment of an individual when his or her interests need to be considered in the context of the rights and interests of others.

Fidelity - Fidelity means that staff make honest promises and honor commitments to persons we serve and anyone else they interface with in the course of their positions. This principle involves creating a trusting and therapeutic climate in which people can search for their own solutions, and taking care not to deceive or exploit persons we serve.

B. STANDARDS FOR ALL STAFF

Standards of Conduct

See Center Wide Procedure VIII-DD (Progressive Discipline) for additional information. Programs within Meridian perform a vast array of functions and deliver a wide variety of services. Some employees perform routine tasks in a safe office environment, while others engage in unpredictable situations under sometimes demanding circumstances. Breach of a particular standard in one context might be less serious, while in another it might result in the loss of life, property, or adversely affect the progress of a client's treatment. Accordingly, supervisors have been delegated primary authority and responsibility for managing the conduct of their employees. If it is deemed necessary to discipline an employee for violation of a conduct standard, Meridian may impose any discipline up to and including termination, taking into account the agency's unique mission and the individual facts and circumstances.

Standards of Conduct, which all employees must meet, are established herein, and any employee who fails to meet these Standards of Conduct is subject to corrective action. Other than for termination, corrective action is to be constructive and shall be for the purpose of motivating the employee to meet Meridian's established Standards of Conduct. All disciplinary actions shall be applied in a nondiscriminatory manner.

Employees may be terminated at will, with or without notice or cause. The examples under the categories listed below are the types of things that can lead to discipline, up to and including termination. This list is not exhaustive:

1. Poor performance

Employees shall strive to perform at the highest level of efficiency and effectiveness; they shall do more than "just get by." Employees are expected to be effective, for example: to organize their work; to stay focused on job-related activities during work hours; to provide the level of effort necessary to get the job done; to demonstrate willingness and ability to make decisions and exercise sound judgment; to produce work that consistently meets or exceeds expectations; to accept responsibility for their actions and decisions; to adapt to changes in work assignments, procedures, and technology; and to be committed to improving individual performance.

2. Poor attendance or time management

Employees are expected to be reliable and dependable, for example: to show up for work, ready to work, on a reliable basis; to observe established work hours and scheduled appointments; to complete work on time; and to obtain permission before being off work and to schedule leave in a manner that minimizes work disruption.

3. Negligence

Employees shall exercise due care and reasonable diligence in the performance of job duties.

4. Inefficiency or inability to perform assigned duty

Employees shall, at a minimum, be able to perform duties in a competent and adequate manner. Employees must be able to perform essential duties of a position with or without

reasonable accommodations.

5. Uncooperative Behavior – Refusal to comply with Managerial Directives

Employees shall follow the managerial directives of persons with duly delegated authority. If an employee is unsure of a directive, they are responsible for gaining clarity from their supervisor or their second level supervisor. Failing to “understand” a directive will not be considered an excuse for failing to follow directions. Employees shall resolve any differences with management in a constructive manner.

6. Violation of the provisions of law

Employees shall abide by all state and federal law including both criminal laws, such as drug laws, and civil law, such as laws prohibiting sexual harassment and employment discrimination.

- a. In regards to the use of illegal drugs, Meridian will not tolerate the use of illegal drugs by employees. Any positive test or admissions of illegal drug use will be dealt with according to the provisions of the Drug Free Workplace - Procedure VIII-Z.

7. Immediate Notification of Arrest/Conviction of any crime including a plea of nolo contendere or a plea of guilty with adjudication withheld.

Any employee who is arrested or receives notice of possible criminal prosecution from any law enforcement agency whether in Florida or another state including any violation mandating a court appearance, must report the expected prosecution to Human Resources and their immediate supervisors per the provisions of this policy. Any employee who is convicted of any crime, including a plea of nolo contendere or a plea of guilty with adjudication withheld, must similarly provide immediate notification of such events to Human Resources and their immediate supervisor. This required notification does not distinguish between misdemeanors or felonies. The only exceptions to this obligation of immediate reporting shall be minor traffic offenses which are defined to include traffic citation such as speeding, running a red light or stop sign, or similar offenses for which a person is not arrested or placed in detention. If, however, any traffic citation involves forfeiture of a driver's license or incarceration, allegations of alcohol or drug-related impairment, such offenses fall under this policy and require immediate reporting to Human Resources and the employee's immediate supervisor. The notification to the supervisor / employer must be given immediately if during work hours or within 24 hours if outside of working hours.

Meridian makes all employment decisions consistent with EEO principles. The mere fact of an arrest or a crime being charged by a law enforcement agency does not necessarily create an impediment to continuing employment. Meridian bases decisions of continuing employment on the seriousness of the pending charges, their job relevance; whether the crime charged is contained in Chapter 435 of the Florida Statutes.

All Regular full-time, part-time employees and PRN staff charged with disqualifying arrests or convictions may be placed on unpaid leave for a maximum of 30 calendar days to clear the charges or bring evidence the charges have been reduced to a non-disqualifying event. Regular, full time and part time employees may use any accrued PTO available to them during the 30-day period. All decisions whether an employee may be placed on an unpaid leave will be the sole discretion of Meridian.

Employees terminated under this guideline may reapply once the issue has been resolved so long as they can successfully complete a Level 2 background screen. There is no guarantee of rehire and successful rescreening in accordance with the law will be required. Meridian may determine that an employee has acted in a manner not conducive to its mission, even if the law violation has not resulted in arrest or conviction. Meridian reserves the right to evaluate an applicant's or employee's overall background and can choose not to hire or choose to terminate even when the individual has received an exemption letter from DCF regarding employment.

8. Violation of Meridian rules

Employees shall abide by all applicable policies and procedures.

9. Conduct unbecoming an employee

- a. Employees shall conduct themselves, on and off the job, in a manner that will not discredit or bring embarrassment to Meridian.
- b. Employees shall be courteous, considerate, respectful, and prompt in dealing with and serving clients, co-workers, and members of the community.
- c. Employees shall maintain high standards of honesty, integrity, and impartiality. Employees shall place the best interest of Meridian ahead of personal interests
- d. All statements both oral and written shall be true and accurate to the best knowledge of the employee. Employee shall not use, or attempt to use, their official position for personal gain or confidential information for personal advantage.
- e. Employees shall protect Meridian property from loss or abuse, and they shall use Meridian property, equipment and personnel only in a manner beneficial to the agency.

10. Misconduct

Employees shall refrain from conduct which, though not illegal, is generally inappropriate for a Meridian employee in the employee's particular position. (See Procedure VIII – DD for a list.)

11. Bullying Behavior – Meridian will not in any instance tolerate bullying behavior towards our staff, clients, and/or business/community partners. Bullying behavior includes threatening, humiliating and/or intimidating behaviors whether verbal or physically.

- a. Verbal bullying – use of slandering, ridiculing, abusive, hurtful, insulting, or offensive remarks towards an individual
- b. Physical bullying – pushing, shoving, kicking, poking, tripping, assault or threat of physical assault
- c. Gesture bullying – nonverbal gestures that can convey threatening messages.

12. Gifts and Persons Served

- a. Staff are prohibited from providing clients with money, personal favors, gifts or services (including transportation) outside of the scope of their position.
- b. Staff are prohibited from seeking, soliciting, or accepting gifts from clients.

13. Non-Employees or Unauthorized Personnel

Employees must consider issues of safety, confidentiality, disruption of operations, and the legal liability posed by the presence of non-employees including children in the workplace. To maintain the safety and privacy of Meridian employees, clients, guests, and visitors:

- a. Staff will not allow or bring any unauthorized individuals (including children) in staff only areas including but not limited to food preparation areas and residential or inpatient units.
- b. Staff will not allow or transport unauthorized individuals in center vehicles.
- c. Under no circumstances shall staff transport clients in their personal vehicles or loan their personal vehicles to clients.

14. Sleeping on the Job

All Meridian positions are awake positions. All staff must be alert, awake and report to work ready and able to perform their duties. Employees are strictly prohibited from sleeping during working hours. Employees will be disciplined for sleeping on the job for all cases unless they have a reported condition that is considered a disability that is protected by state and/or federal laws.

- a. Any staff taking prescription medication that contains a warning that the medication may cause drowsiness must report that they are taking such medication to their supervisor in advance of their scheduled time so that the supervisor or staffing department has adequate time to determine if the employee should report to work.
- b. Failure to report the observance of another staff sleeping on duty shall be cause for

disciplinary action, up to and including termination from employment.

15. Habitual illegal drug use

Meridian shall not tolerate violations of Meridian's Drug-Free Workplace (Procedure VIII-Z) or other misuse of mood or mind-altering substances, including alcohol and prescription medications.

16. Falsification of any written or electronic documentation

Meridian shall not tolerate falsification of any documentation, including billing/ service records, timesheets, or incident reports.

17. Falsification of Client Observation Checks

To account for the safety, security, and presence of clients, Meridian requires that inpatient and residential clients be checked and observed on a required established schedule. Meridian shall not tolerate falsification of client monitoring flow sheets or falsification of client observations/checks. Under no circumstances, shall a staff record or document a check or observation that had not actually occurred. It is essential that related records be accurately completed.

18. Theft

Meridian shall not tolerate the misuse or theft of company funds, money, equipment or property. Theft includes the unauthorized use of Company services, facilities as well as taking any company property for personal use.

19. Unauthorized Overtime

Employees who fail to obtain approval prior to working hours that extend beyond their normal workweek or hours that result in overtime will be subject to disciplinary action up to and including termination.

20. Failure to comply with Meridian's Corporate Compliance Program

All employees and agents of Meridian shall comply with all aspects of Meridian's Corporate Compliance Program, including the requirement to report any suspected or known violations of Program and the Code of Conduct.

21. Service Quality

In their commitment to helping others, staff shall value objectivity and integrity. Staff shall accept responsibility for the consequences of their work and make every effort to insure that services are of the highest professional quality, effectiveness, and efficiency. Staff members are personally responsible for the quality of their services.

Quality service and professionalism of staff includes the following:

- a. Assuring the continuity of care for persons we serve is an integral part of service quality. This applies to transfer of care and aftercare planning. (For example, each counselor is responsible for follow-up of referrals to other agencies or other individuals.) Exhibiting exemplary conduct.
- b. Employees will not engage in any behavior toward a person we serve that may be considered as abusive or neglectful, and will immediately report any observance of such behavior to their supervisor. Any reports of alleged abuse or neglect will result in the completion of an Incident Report and will be investigated. Examples of negligent behavior or abuse -
 1. Abuse - Actions by a staff member who is providing care and/or supervision to a client which may result in physical harm, pain or mental suffering to the client.
 2. Physical or Sexual Abuse: the use or attempt to use unnecessary force on the client, unreasonable physical constraint or prolonged or continual deprivation of food or water. It also means the use of isolation, physical or chemical restraint, or psychotropic medication without medical authorization for punishment.

3. Mental Suffering: fear, agitation, confusion, severe depression or other forms of emotional distress that is brought about by taunting, threats, harassment or other forms of intimidating behavior.
4. Neglect: the negligent failure of a person(s) having care or custody of a client to exercise a reasonable degree of care including, but not limited to, a failure to assist in personal hygiene and the provision of food, clothing, and shelter, or failure to provide medical care or protect the client from health and safety hazards.
5. Working together with other staff in a climate of mutual trust, respect, dignity, edification, and impartiality.
6. Knowing Meridian's programs, policies, rules and procedures.
7. Reporting all wrong doings either directly observed or substantiated by reasonable data.

22. Business Ethics and Public Relations

Meridian Behavioral Healthcare and its employees will operate in accordance with all applicable laws and regulations in order to maintain the integrity of our organization. We have a duty to report any perceived violation of applicable laws, regulations and professional standards to management, Human Resources, the Compliance Officer, or the Compliance Hotline (352-374-5600, Ext 8222).

In dealing with other agencies and soliciting or pursuing contracts, Meridian Behavioral Healthcare, Inc. ensures that its business practices are fair and ethical at all times. Meridian's staff will adhere to all legal, professional, and ethical standards in educating the community, advocating for public policy or funding, ensuring that it supports policy, funding, and public education efforts that further the interests of those we serve and the community as a whole.

Staff will not make any contributions of Meridian Behavioral Healthcare funds, property, or services to any political party or candidate.

The marketing of any services that Meridian offers to the public or other healthcare entities (i.e. managed care organization, governmental agencies, and other healthcare providers) will be done in an ethical, honest manner that is consistent with the code of ethics. Communication, either written or verbal, must be accurate, honest and make every effort to accurately reflect the quality and type of care that we provide.

Meridian Behavioral Healthcare, Inc. will receive permission via consent from persons we serve and employees prior to using their pictures, quotes or any personal information that would violate their confidentiality.

23. Billing and Cost Reports

It is the intent of Meridian Behavioral Healthcare, Inc. to prohibit the submission of any claim for payment or reimbursement to any third party that is false, fraudulent, knowingly inaccurate, or fictitious. **Violations or suspected violations of this portion of the Code of Conduct procedure are extremely serious and must be reported immediately to a member of management, the Risk Manager or to the Corporate Compliance Officer.**

- a. Staff will only submit for payment or reimbursement claims for services actually rendered that are appropriately documented in treatment and/or service records using billing codes that accurately describe the services provided.
- b. Staff will only submit for billing services that are reimbursable under non-treatment contracts.
- c. Staff will only provide those services which are individualized, specific, and consistent with symptoms or confirmed diagnosis of the illness and can reasonably be expected to improve the individual's condition or prevent further regression, and not in excess of the needs of persons we serve.
- d. Staff will take immediate steps to alert appropriate management personnel if inaccuracies

- are discovered in our cost reports or in claims submitted for payment or reimbursement.
- e. Staff who misrepresent services or submit false claims for services will be subject to immediate termination and may be subject to criminal charges.

24. Conflict of Interest

Staff will avoid all situations that may create an actual conflict or the appearance of conflict, of loyalty or interest unless approved in advance by appropriate management.

- a. Meridian Behavioral Healthcare and its employees will take all reasonable steps to avoid conflicts, or appearance of conflicts, between the private interests and the official responsibilities and performance of our duties. Staff has a duty to report any actual or perceived conflicts of interest to management, human resources, the Compliance Officer, or the Compliance Hotline.
- b. Staff members faced with perceived ethical dilemmas are to seek guidance from their supervisors to clarify choices in any ethical dilemma.

25. Protection of Assets

Meridian Behavioral Healthcare and its employees are committed to protecting the organization's assets, and the assets of others entrusted to us, including physical property and proprietary information, against loss, theft, or misuse. Staff has a duty to report any actual or perceived loss, theft, or misuse of Meridian Behavioral Healthcare property or the assets of others to management, Human Resources, the Compliance Officer, or the Compliance Hotline.

- c. Staff will be held accountable for the proper expenditure of Meridian Behavioral Healthcare funds and for the proper use of the organization's property.
- d. Staff will obtain approval from the appropriate authority, prior to the commitment or expenditure of any Meridian Behavioral Healthcare funds.
- e. Staff will follow generally accepted accounting principles, established finance procedures, and internal control procedures in handling and recording all funds and property.
- f. The property and equipment of Meridian Behavioral Healthcare, Inc. is to be used for business use only. Any personal use of equipment must be prior-authorized by the employee's supervisor. Costs incurred by Meridian for the personal use of agency property (i.e.: computers, tablets, cellular telephones, personal long distance calls, printers, fax machines) will be reimbursed by the employee.
- g. Staff has a duty to safeguard the property of persons we serve, employees, and visitors.
- h. Staff will dispose of surplus, obsolete or condemned property in accordance with Meridian Behavioral Healthcare's policies and procedures. Unauthorized disposal of property is a misuse of assets.
- i. Staff has a clear obligation to use their paid time productively. Misuse or misrepresentation of time worked is an abuse of Meridian's assets and could result in disciplinary action up to and including termination.

26. Human Resources

Meridian Behavioral Healthcare is committed to protecting and supporting all employees as well as helping them to achieve their fullest potential in a fair and equitable manner. Staff has a duty to report any actual or perceived mistreatment, discrimination, safety issues, hostile activity, legal violations, or other non-compliance issues occurring in the workplace to management, Human Resources, the Compliance Officer, or the Compliance Hotline. (352-374-5600, 8222)

- a. Meridian Behavioral Healthcare will not tolerate any form of physical, verbal, psychological, sexual abuse. Sexual abuse includes unsolicited or unwelcome sexual advances, requests, or demands for sexual favors, or any verbal, physical, or visual conduct of sexual nature, or any act that might create a hostile or uncomfortable environment.
- b. Staff will demonstrate respect for the persons we serve and co-workers by notifying a supervisor in advance if we are unable to report for work as scheduled.

- c. Staff will ensure that everyone is afforded equal employment and advancement opportunities regardless of gender, age, disability, race, color, religion, marital status, sexual orientation, or national origin.
- d. Staff will ensure that everyone is afforded equal pay for equal work regardless of gender, age, disability, race, color, religion, marital status, sexual orientation, or national origin.
- e. Staff will treat each other with respect, dignity and professional consideration at all times, regardless of gender, age, disability, race, color, religion, marital status, sexual orientation, national origin, job position, or employment status.

27. Safety

Meridian is committed to providing a safe environment for employees as well as the persons we serve. Staff has a duty to report any actual or perceived safety issues occurring in the workplace to management, human resources, the Risk Manager, the Compliance Officer, or the Compliance Hotline (352-374-5600, 8222)

- a. Staff will comply with all work and safety rules, regulations, policies, and procedures.
- b. Staff will take all reasonable precautions to ensure our safety as well as the safety of persons served, visitors, and other personnel.
- c. Staff will maintain and regularly communicate our emergency plans and procedures to employees and persons served to maximize safety. We practice safety awareness by thinking defensively, anticipating potential hazards, and reporting unsafe conditions immediately.
- d. Staff will maintain an atmosphere, which is free from workplace violence. Staff shall not engage in verbal or physical confrontation with a potentially violent person. Staff must immediately report any threats made against employees or persons served or face disciplinary action up to and including termination. Any verbal or physical threats of violence made by a staff member, (even made jokingly) may result in disciplinary action up to and including termination.
- e. Staff will refrain from providing personal contact information on any employees or clients unless approved by management or in compliance with Meridian policies and procedures.
- f. Staff will promote a work environment that discourages smoking. Smoking is not permitted on any Meridian campus at any time. Non-exempt employees may not leave campus, except during a designated 30 minute or greater lunch break, and when they are clocked out.
- g. Staff will promote an environment that is drug and alcohol free. The illegal possession, distribution, use, sale or abuse of controlled chemical substances or alcohol while on company business or on company premises is strictly prohibited and may result in disciplinary action. Please see the Drug-free Workplace procedure (Chapter VIII-Z).

28. Organization Communication

Meridian Behavioral Healthcare will foster an environment that encourages open communication. Staff has a duty to report any actual or perceived communication problem to management, Human Resources, the Compliance Officer, or the Compliance Hotline.

- a. Staff is responsible for sharing ideas, resolving problems or concerns and treating all opinions with respect and consideration and in a professional manner.
- b. Staff will raise legitimate questions or concerns in an appropriate and efficient manner. Supervisors and management shall respond timely and in a professional manner, to questions and concerns brought to their attention by staff.
- c. Staff use of Internet access and internal/external e-mail will be monitored by the management of Meridian Behavioral Healthcare, Inc., and therefore staff has no expectation of privacy in regard to Company email. Staff who engage in illicit internet activities will be subject to immediate dismissal. Use of e-mail is limited to the function of job performance.

29. Communication with Persons We Serve

Staff will inform persons we serve, their family members, or legal guardians of all aspects of their care and treatment with appropriate informed consent. Informed consent includes full disclosure of potential risks, side effects, and the benefits of the proposed treatment, as well as treatment alternatives.

- a. Staff will respect the right of persons served to:
 1. Receive information on Meridian Behavioral Healthcare's policies, procedures, and fees.
 2. To participate in decisions regarding their care and treatment, including the refusal of treatment to the extent permitted by law, and to be informed of the consequences of such action.
- b. Staff will promptly and courteously answer all questions from persons served, or refer them to the proper resource.

30. Supervisor Responsibilities

Those who manage or supervise others also have a responsibility to:

- c. Respect diverse opinions.
- d. Maintain an open door approach and listen to issues that are raised. Respond to issues or concerns in a professional, respectful and timely manner.
- e. Assist subordinates in understanding their rights and obligations under law, regulation and the Standards of Conduct.
- f. Identify, define, and communicate the duties and performance expectations of all direct reports.
- g. Provide accurate and timely feedback regarding performance through regularly scheduled supervision and periodic performance appraisals.

31. Non-Retaliation Policy

Meridian Behavioral Healthcare will not take any disciplinary action or other types of retaliation against any employee who, in good faith, reports a concern, issue, or problem to management, Human Resources, the Compliance Officer, or the Compliance Hotline.

- a. "Good faith" means that you should be telling the truth, as you know it.
- b. Any employee who believes that he or she has suffered retaliation from making a report should contact the Compliance Officer or call the Compliance Hotline at (352) 374-5600 Ext. 8222. Any staff member found in violation of Meridian's Non-Retaliation Policy will be subject to disciplinary action up to and including termination of employment.
- c. It is also our intent to protect employees from the intentional misuse of the Hotline. Intentionally making a false accusation is a serious violation of Meridian Behavioral Healthcare's policies and procedures and may lead to disciplinary action up to and including termination of employment.

32. Employee Competence

Meridian strives to hire the most qualified staff available and provide opportunities for the professional growth and development of all staff.

- a. Staff shall accurately represent their own qualifications / affiliations or those of their colleagues.
- b. Staff shall provide services using techniques, including testing/assessment techniques, which are generally accepted in terms of effectiveness and procedures. Controversial issues shall be discussed prior to use with one's supervisor and shall meet with supervisory approval.
- c. Staff shall be responsible for recognizing the limitations of their competence and will only provide services and use procedures with which they are familiar and are qualified by

- training and experience.
- d. Staff shall take the initiative to seek supervisory advice for programmatic issues related to service delivery.
 - e. Staff shall maintain knowledge of current scientific and professional information related to their area of expertise. Staff will comply with their individualized training plan determined by their supervisor and Human Resources when hired.
 - f. Staff is expected to recognize the need for continuing education and shall take the initiative to obtain training, experience, or counsel to assure competency in their field. Staff will be encouraged to participate in conferences and professional meetings that directly relate to professional competence and program needs.
 - g. Staff is expected to recognize that personal problems and conflicts may interfere with professional competence. They shall refrain from undertaking activities in which a personal problem may lead to inadequate professional service or harm to persons served. Such staff is expected to seek competent professional assistance. Meridian makes an Employee Assistance Program available for all staff.
 - h. Staff is expected to meet all annual training requirements that have been outlined in the Training Plan as well as those identified in supervision.
 - i. Staff is responsible for obtaining access to the Meridian Electronic-Learning system (MyLearningPointe) to complete required online courses.
 - j. Staff shall offer competent service provision including complete, accurate, and timely documentation. This is especially important with regard to documentation in the service records and in Unusual/Adverse Incidents.
 - k. Personal values and judgments are not appropriate in a service record or in Incident Reports. It is important to describe specific aspects of problematic behaviors or events without recording personal value judgments. Service records shall not contain references to socially embarrassing behavior or unnecessary reference to anti-social behavior.
 - l. Staff shall not falsify any type of Meridian record/documentation. Falsification of any documents may result in immediate termination.

C. CONDUCT - GENERAL

1. Community Standards

Staff shall show regard for the standards of the community in which they work especially those which may affect their ability to deliver professional services. Staff shall recognize that violations of such standards on their part may involve their client/colleagues by damaging their professional credibility, injuring their own name and/or the reputation of Meridian, therefore substantially affecting their ability to provide services. Meridian recognizes the importance of due process and considers employees as innocent until proven otherwise.

2. Conflict of Interest

No staff shall solicit or accept free or discounted goods, services, prices, gifts, favors, accommodations, entertainment, discounted loans, or anything else of value when there is evident intent to influence decisions or performance standards of Meridian or its employees in performing their official duties. Any goods, services, prices, gifts, favors, accommodations, entertainment, discounted loans, or anything else of value of more than \$100 that meet the above requirement must be reported and approved by a second level supervisor prior to acceptance.

3. Nepotism/Fraternization

Meridian employees shall not appoint, employ, promote, advance, or advocate for appointment, employment, promotion or advancement, a relative or person with whom they have a close personal relationship to a position in the same Department or area at Meridian over which the employee exercises any jurisdiction or control. Administration has the right to grant exceptions. (See Procedure VIII-H Nepotism).

4. **Grooming/Hygiene**

All staff shall observe good hygiene practices and dress appropriately for their job function. (See Procedure VIII-CC Personal Appearance and Dress)

5. **Personal Fundraising**

Employees are not permitted to conduct non-Meridian sanctioned fundraising while on company time or to solicit other employees while they are on company time. Further, employees are not permitted to post or distribute any flyers for fundraisers or any non-work related event program on Meridian property.

Employees may request permission to hold a fundraiser for a personal concern that has a tie to Meridian (e.g. a fellow employee's home is destroyed, an employee's child medical care, etc.) This request must be made in writing to the Chief Human Resource Officer (CHRO). The request will be reviewed by the Executive Management Team for approval. These requests will be approved on a limited basis.

6. **Witnessing of Documents by Staff**

Witnessing of documents can only be done by appropriate individuals in accordance with laws, regulations and industry standards. Authority is limited and vested pursuant to persons served to those designated by the Chief Executive Officer of the organization. If authority is granted to witness a document, the witness shall not remove, conceal, destroy, or share the information contained in the documents.

The witness is attesting only to having actually observed the individual sign the form. The witness' signature does not indicate that the staff member fully informed the individual of the risks and benefits of the plan or program, or that the individual understood the staff member.

The primary function of the witness is to verify that the individual actually signed the consent form, and he or she may be called to testify to that fact.

7. **Private Practice (Licensed Staff)**

Meridian staff shall not conduct a private practice or other personal business during assigned working hours.

Staff "on call" shall not allow private practice/personal business to interfere with on-call responsibilities. Staff shall not use Meridian material, equipment, or facilities for conducting private practice/personal business. Non-remunerative personal business may be conducted only during off duty hours or with prior written consent of the President, or designee, provided that the interest of Meridian and the quality of care are not adversely affected thereby. Those who have received prior approval to conduct personal business shall immediately reimburse Meridian for all costs incurred by such personal use of Meridian material, equipment, or facilities.

- a. Meridian counseling staff shall not accept any referral of a Meridian person served in their private practice (for the purpose of this section, a Meridian person served is anyone who has been admitted to a Meridian program or is eligible for on-going care at Meridian within the past six months).
- b. Meridian counseling staff shall not solicit, apply for, or accept private contracts with outside agencies or providers of which Meridian holds a current service contract and/or working agreement.
- c. Additionally, individuals and/or organizations that are employed by Meridian, and gain access to knowledge of potential contracts or requests for bids or proposals of services while in an employment/contractual agreement with Meridian Behavioral Healthcare, Inc., shall not use that information for personal gain nor submit proposals or bids for said services.
- d. Staff must notify the Chief Executive Officer and Corporate Compliance Officer in writing

of intent to do private practice, or any other secondary employment (including home based businesses) by completion of the Secondary Employment Notice form (VIII-Y Attachment A). Staff must notify Human Resources promptly of any changes to secondary employment.

- e. Any exception to this procedure requires written supervisory consult and approval from the President.

8. **Secondary Employment (Non-licensed Staff)**

Meridian staff shall not work at secondary employment during assigned working hours or accept any secondary employment which would be considered a conflict of interest.

- a. Staff "on call" shall not allow secondary employment to interfere with on-call responsibilities.
- b. Staff shall not use Meridian resources including material, equipment, or facilities for secondary employment.
- c. Staff must notify Human Resources of any secondary employment (including home based businesses) by completion of the Secondary Employment Notice form (VIII-Y Attachment A). Staff must notify Human Resources of any changes to secondary employment.
- d. Any exception to this procedure requires written supervisory consult and approval from the President.

9. **Solicitation/Referral**

Employees shall refrain from soliciting patients or persons we serve through the use of fraud, intimidation, or undue influence.

Employees are advised that it is against Meridian policies and procedures to offer, pay, solicit, or receive a kickback, directly or indirectly, in cash or in kind for referring or soliciting patients.

10. **Meal Periods**

A meal may be allowed, but is not required under the FLSA (Fair Labor Standards Act). When a meal period is a part of the workday, the period must be at least 30 minutes. In some special situations, employees may be directed to work during their meal periods. In such instances, meal periods are considered time worked.

11. **Work Breaks**

A work break of up to 15 minutes may be allowed, but is not required under FLSA (Fair Labor Standards Act) during the first half of the work shift and again during the second half of the work shift. An employee cannot combine, accumulate, or use this time to cover late arrival or early departure from duty. Work breaks are considered time worked and employees and supervisors must ensure this privilege is not abused and does not interfere with established work schedules. Nonexempt employees are prohibited from going off site during work breaks and smoking is limited to official lunch breaks off site. Work Breaks are required under FLSA (Fair Labor Standards Act).

D. PROFESSIONAL / COLLEGIAL RELATIONSHIPS

1. Staff shall act with due regard for the needs, special competencies and obligations of their colleagues and related professionals. Staff shall respect the prerogatives and obligations of the organizations with which other staff may be associated.

Counseling staff shall maintain respect for the rights of privacy of their colleagues:

2. A person we serve who is discovered by one staff member to have a continuing therapeutic relationship with a colleague within Meridian shall not be offered or given services without the knowledge and consent of the colleague except in emergency situations or those indicated in the treatment plan.

3. Criticism of a colleague's services or procedures shall be addressed to the appropriate individual in the organization, following proper procedures.
4. Meridian is committed to providing a work environment that is free from sexual or personal harassment. Sexual or personal harassment is a form of employee misconduct, which undermines the integrity of employment relationships, and is strictly prohibited.
5. The making or publishing of vicious, malicious, or false statements concerning any employee of Meridian or of its operations is strictly prohibited.

D. EMPLOYEE RELATIONSHIPS WITH PERSONS SERVED

1. Every staff shall treat all persons served and the general public with courtesy, impartiality, fairness, and equality. No staff shall grant special consideration, treatment or advantage to any person served beyond that which is available to every other individual. Staff shall insure that no person or citizen shall be discriminated against on the basis of race, creed, religion, sex, national origin, sexual orientation, veteran's status, medical condition, or handicap. All persons and citizens shall be treated with dignity and respect at all times.
2. Staff is instructed that the use of courtesy titles must be uniform. If you address persons we serve by their first name, do so consistently. Also be aware not to call persons served, such things as "Honey", "Sweetie", or "Old Joe."
3. Staff shall have an objective, personal concern for those we serve. They shall also maintain this personal concern within the bounds of their responsibilities and duties, so as to safeguard the welfare of the person we serve both during and after service delivery.
4. Every effort shall be made to avoid the development of non-professional obligations in the therapeutic or consultation relationship.
5. Counseling staff especially shall continually recognize their position of power and influence in the professional relationship and avoid any exploitation of the person we serve.
6. Peer specialists are expected to adhere to the same professional relationship boundaries and ethics as all other Meridian employees. Peer Specialists will at all times respect the rights, dignity, privacy and confidentiality of clients they provide services to. Peer Specialist relationship boundaries are established to promote trust, increase safety, demonstrate respect, develop rapport and provide structure to the helping relationship.
7. Dual relationships with persons we serve during treatment and thereafter are prohibited. For the purpose of defining dual relationships:
 - a. A person we serve maintains this status in perpetuity (unending).
 - b. Relationships that are not acceptable include but are not limited to socialization outside of the work environment, business or financial relationships, and dating and sexual intimacies.

Dual relationships are prohibited for the duration of staff's employment at Meridian. Licensed staff will follow time frames required by law for refraining from dual relationships.

8. The relationship between professional and the person served shall never include conduct on the part of the staff which would be abusive (verbal or physical), sexual, negligent, threatening, intimidating or damaging to the person in any way.
9. When there is a conflict among colleagues, staff shall be concerned primarily with the welfare

of the person we serve and only secondarily with the interest of their peer group .

10. Staff shall terminate a clinical or consultation relationship when it is reasonably clear that the person served will not continue to benefit from it.
 - a. Care shall be taken to insure an appropriate setting for *provision* of services, especially clinical work, to protect both persons served and staff .
 - b. After discussion with his/her supervisor and prior to accepting responsibility for a person to be served we serve, a counselor having pre-existing social ties or relationships with an individual seeking services shall carefully evaluate his/her capability to effectively treat that person and, if appropriate, refer that person to another Meridian resource.
 - c. Staff are prohibited from sponsoring a person served for any recognized peer support group (e.g. Alcoholics Anonymous, Narcotics Anonymous, Emotions Anonymous, etc.) during the time they are active/open to any treatment programs or services and for a six-month period thereafter
 - This rule is applicable to all staff, including full-time staff, part-time staff, PRN staff, and Peer Specialists.
 - If a pre-existing sponsor/sponsee relationship exists, staff shall notify their supervisor and arrangements should be made to end that relationship during services and for six months thereafter.
11. All services shall be rendered on Meridian premises, except by staff specifically assigned to conduct "home visits" or "outreach" services, and only with prior permission of supervisor and supporting documents in the treatment plan.
12. Staff is prohibited from providing clients with personal favors, gifts, or services (including transportation) outside of the scope of their position. If there is any question regarding a specific action, staff should consult with their supervisor, Human Resources, or the Compliance Officer.