

LASSEN COUNTY BEHAVIORAL HEALTH

Code of Conduct 2023-2024

Prepared by:

Tiffany Armstrong, LCSW

Department Approval:

Tiffany Armstrong

Compliance Approval:

Fiscal Approval:

[Signature]

Health and Social Services Approval:

[Signature]

Medical Director Approval:

[Signature]



Lassen County Behavioral Health

Code of Conduct

Mission

The mission of Lassen County Behavioral Health (LCBH) is to provide comprehensive, integrated behavioral health services that promote the health and quality of life of our community members.

As LCBH pursues this mission, each employee is expected to conduct their work with the highest standards of Conduct and integrity. Each employee will conduct all business activities in a law-abiding fashion. Each employee will maintain a service culture that builds and promotes the awareness of compliance.

Vision

The vision of Lassen County Behavioral Health is to inspire confidence and respect as a provider of comprehensive behavioral health care.

Core Values

LCBH services will:

- Protect the dignity and privacy of the individuals served.
- Be empirically advised and clinically sound.
- Respond to community diversity through culturally sensitive beneficiary focused care.
- Target outcomes that satisfy the beneficiary's behavioral health needs.

LCBH staff will:

- Be friendly, courteous, and efficient.
- Observe the highest professional standards.
- Respond with empathy and compassion to the needs of the beneficiaries we serve.
- Promote a broad-based partnership of coordinated community care.

LCBH service sites will:

- Be physically accessible to all individuals.
- Be safe, hospitable and well-organized.
- Be governed by business practices that are efficient, accountable and honest.

LCBH management practices will:

- Promote respect and dignity towards the staff.
- Encourage continuing professional development.

- Support staff participation in community activities important to the well-being of the public.
- Promote a broad-based partnership of coordinated community care.

Goals

- To provide accessible effective, and efficient behavioral health services.
- To continually measure the outcomes of the services provided to ensure effectiveness, efficiency and fiscal accountability.
- To engage in active outreach to ensure prevention, early intervention and coordination of services to reduce the impact of behavioral health disorders for the individuals and community we serve.

Purpose of the Code of Conduct

The Code of Conduct is one component of the LCBH Compliance Plan, a plan required by the State of California and the US Department of Health Services Office of the Inspector General. The Code of Conduct provides guidance to LCBH staff and assists in carrying out daily activities within appropriate standards and applicable laws and regulations.

Each of us has our own personal code of conduct that is based on our personal values. However, when we become a part of LCBH, staff conduct is expected to reflect the Department's values. This expectation applies to every staff member and organization associated with LCBH. Staff are required to read the LCBH Code of Conduct, understand it, and sign an acknowledgement that they have fulfilled these requirements and that they agree to abide by it while representing LCBH.

The LCBH Code of Conduct is intended to complement, not replace, County policies and procedures. If there is not an existing policy or procedure to provide guidance on a particular subject matter or set of circumstances, the principles of the Code of Conduct will serve as a guideline.

Quality of Care and Services

LCBH is dedicated to providing the highest quality of care available, while maintaining the strictest standards of conduct. LCBH staff will:

- Follow best practice standards when delivering mental health and substance abuse treatment services.
- Provide timely services to beneficiaries that are appropriate to their background, culture, religion, and heritage.
- Treat all beneficiaries with dignity, respect, and courtesy.
- Not discriminate in the provision of services because of a Beneficiary's race, color, ethnicity, creed, national origin, economic condition, gender, sexual

preference, sexual identity, age, or physical, sensory, cognitive, or mental disability in adherence to the CLAS Standards.

- Do no harm to beneficiaries, the community, or other staff.
- Respect the rights and views of other professionals and professions, and seek consultation on behalf of the Department's beneficiaries, when appropriate.
- Employ professionals with proper education and/or credentials and ensure that all members of the service team have experience and expertise in the areas in which they provide services. Registered, certified, and/or licensed staff will not provide services beyond their scope of practice, as outlined by California code.
- Document all service encounters accurately and completely in the beneficiary's chart, in a timely manner.
- Provide beneficiaries with the information that they need to make fully informed decisions. Beneficiaries have a right to receive information about LCBH programs, policies, procedures, requirements, services, grievance processes, and fees.
- Participate in quality improvement activities and act promptly to mitigate deficiencies or errors.
- Provide all services in accordance with applicable federal, state, and local laws.

Staff Responsibilities

LCBH Code of Conduct can only succeed through the efforts and commitment of staff to conduct themselves with honesty and integrity. Each staff member is responsible for their own conduct and LCBH is committed to maintaining a work environment that supports staff in their demonstration of these ideals. In order to reach these goals, staff members will:

- Read and be familiar with the LCBH Compliance Plan standards, policies, and procedures.
- Read, acknowledge, and retain a copy of the Code of Conduct.
- Comply with the Code of Conduct, Department policies and procedures, and applicable laws and regulations at all times when representing LCBH.
- Create a culture within LCBH which promotes the highest standards of conduct and compliance.
- Conduct themselves in a manner appropriate to their standing as representatives of local government, as outlined in this Code.
- Report all violations of the Code of Conduct, County policies and procedures, and applicable laws and regulations. Depending on the circumstance, failure to comply with this reporting requirement may subject a staff member to disciplinary action.
- Cooperate with compliance investigations and supply information requested during compliance investigations unless such disclosure of information would violate the confidentiality requirements of Subpart 2, Title 42, Code of Federal Regulations.

NOTE: LCBH staff members will be protected from any retaliatory acts that may result from reporting, in good faith, possible violations of this Code.

Documentation Standards

LCBH will maintain accurate records consistent with all federal, state, and local laws and regulations, as well as LCBH policies and procedures. LCBH staff will:

- Ensure documentation adheres to standards set forth by DHCS.
- Confirm that all records in any medium are maintained in an accurate and secure manner in order to protect the privacy and confidentiality of beneficiaries and the integrity of LCBH programs.
- Comply with record retention guidelines established in Department policies and procedures.

Workplace Conduct

LCBH recognizes that the Department's greatest strength lies in the talent, integrity, and commitment of staff. The Department prides itself on treating staff with respect, dignity, and courtesy. Staff members are expected to conduct themselves professionally and properly in all situations while representing LCBH. LCBH staff will:

- Perform duties and deliver services in a manner that promotes public trust and encourages participation in County programs.
- Maintain a working environment free from all forms of harassment or intimidation, sexual or otherwise, showing respect and consideration for the public, beneficiaries, colleagues, and staff members. Sexual conduct, discriminatory treatment, abuse, violence, or intimidation is not tolerated.
- Maintain an alcohol- and drug-free environment on County premises. Prescription medications may be used by staff only in the manner prescribed by an individual legally authorized to do so.
- Conform to the Code of Conduct and standards of their profession/credentials and exercise sound judgment in the delivery of services based on their scope of practice.
- Not engage in any activity that could be construed as exploitation of beneficiaries for personal, sexual, financial, physical, or social gain. This prohibition includes engaging in personal, social, or business relationships with beneficiaries.
- Not attempt to coerce a beneficiary or abuse authority over a beneficiary.
- Empower beneficiaries to help themselves.
- Understand that a therapeutic relationship does not end when a beneficiary leaves treatment. Recognize the need to conduct a subsequent relationship with a former beneficiary with the same concern and integrity that is present herein.
- Seek positive and cooperative relationships within the Department, as well as with other government programs, providers, vendors, community groups, and industry representatives to enhance services and resources available to the public.

- Afford equal employment and advancement opportunities to all applicants and employees, pursuant to Department and County policies.
- Comply with work and safety policies in accordance with federal, state, local, and Department policies and procedures.

Use of Social Media

- Do not engage in activity on social media sites that violates LCBH's mission, vision and values.
- As an employee, when one's connection to LCBH is apparent, the employee must make it clear that the posting is on behalf of the individual and not LCBH.
- Protect Beneficiary's confidentiality and protected health information at all times.
- Do not write or say anything that violates LCBH's privacy, security, or confidentiality policies. Never post any information that can be used to identify an LCBH Beneficiary's identity or health condition.
- Maintain the confidentiality of LCBH business information and do not discuss this information on social media sites or other media platforms.
- Always seek official approval from the Department before posting an official statement about LCBH. Only designated staff may speak on behalf of LCBH.
- Employees may not use LCBH email addresses or phone numbers for personal use of social media or other non-Departmental websites without approval.

Adherence to Laws and Regulations

LCBH is governed by applicable laws and regulations and conducts business in an honest manner. LCBH staff will:

- Comply with all applicable laws, rules, regulations, and standards required by federal, state, and local governments. LCBH also complies with County and Department policies and procedures.
- Report child, elder, and dependent adult abuse, as mandated by California code.
- Ensure that no false, fraudulent, inaccurate, or fictitious claims for payment or reimbursement of any kind are submitted.
- Bill only for services that are medically necessary and adequately justified and documented in the beneficiary's chart.
- Ensure that all billing claims and beneficiary records are accurate, complete, timely, and detailed to the extent required by law and professional standards.
- Act promptly to investigate and correct problems if errors in claims or billings are discovered.

Safety

- Comply with established safety policies, standards, and training programs to prevent job-related hazards and ensure a safe environment for beneficiaries, providers, employees, and visitors.
- Wear an LCBH badge at all times while in LCBH offices and when representing LCBH offsite.
- Not share or lend an LCBH employee badge to any other individual, including visitors, other LCBH staff, or partnering agencies to access secured areas in LCBH offices. Badges are issued on a per-individual basis and may only be used by the individual who was issued that badge.
- Individuals who are not current employees of LCBH or current clients must sign in at the front desk. This includes county employees from other departments, contracted repair persons, trainers, community agencies. Visitors will be provided with a temporary badge indicating they are a visitor. Badges are to be worn in a visible location on the person. Visitors will return their visitor badge and sign out upon their completion of their purpose on LCBH property.

Conflicts of Interest

LCBH avoids conflicts of interest and the appearance of conflicts of interest between one's own personal concerns and the best interests of the Department. Conflicts of interest can distort medical decision-making, cause over-utilization of services or supplies, and result in unfair competition. LCBH staff will:

- Avoid practices that interfere with the ability to effectively and thoroughly perform duties for LCBH, or that conflict with the interests of the Department, beneficiaries, or staff.
 - Examples include: 1) soliciting employment with an organization working with the County, over which the staff member has some influence in their official capacity; and 2) using County time, facilities, equipment, badge, or uniform for private gain.
- Report any potential conflicts of interest to the Compliance Officer/Designee.
 - LCBH staff members will be protected from any retaliatory acts that may result from reporting, in good faith, possible violations of this Code of Conduct.
- As a LCBH employee, do not accept gifts, and other benefits with a total value of more than \$50.00 from any individuals, businesses, or organizations doing business with LCBH. Vacations, transportation and entertainment is not allowed.
- As a LCBH employee, do not accept cash or cash equivalents (gift certificates, gift cards, checks or money orders) in any amount from any individuals, businesses, or organizations doing business with LCBH.
- As a LCBH employee, do not engage in outside employment or self-employment that may conflict with the work of LCBH.

Protecting County Assets

LCBH is committed to protecting the property and assets of the County. LCBH staff will:

- Be responsible and accountable for the proper expenditure of County funds and the proper use of County assets and property.
- Obtain appropriate authorization prior to allocating or spending Department funds.
- Utilize work hours in a productive and professional manner.
- Use computer systems, networks, and software consistent with Department policies. Store equipment, data files, and software in a secure and confidential manner consistent with Department policy and HIPAA standards.
- Do not modify, destroy, or remove electronic communications resources (e.g., computers, phones, fax machines, etc.) that are owned by LCBH without proper authorization.
- Do not install or attach any mobile or remote devices or equipment to an LCBH electronic communications resource without approval.
- Safely store, secure, document, and inventory County supplies. Missing supplies will be reported to the appropriate supervisor.
- Dispose of surplus, obsolete, or junked property in accordance with Department/County procedure, paying close attention to the correct disposal of property that may contain protected health information. Scrapping, selling, or transferring of County property without approval is strictly prohibited.
- Report any observed misuse of County property or funds.
 - LCBH staff members will be protected from any retaliatory acts as a result of reporting, in good faith, possible violations of this Code of Conduct.

Privacy and Confidentiality

All LCBH employees, Commissioners, Committee Members, and Contracted Business Partners are responsible for following these standards.

- Respect the privacy of beneficiaries, providers, and co-workers by safeguarding their information from physical damage, maintaining beneficiary health information and business documents in a safe and protected manner, and following LCBH's record retention policies.
- Protect the privacy of LCBH Beneficiary's protected health information (PHI) according to federal and state requirements.
- When using, disclosing, or requesting PHI, limit the information to the minimum amount needed to accomplish the work. Do not share or request more PHI than is necessary.

- Only share medical, business, or other confidential information when such release is supported by a legitimate clinical or business purpose and is in compliance with LCBH policies and procedures, and applicable laws and regulations.
- Whenever it becomes necessary to share confidential information outside LCBH for legitimate business purposes, release PHI only after obtaining a signed business associates' agreement or a completed Authorization to Release Information Form.
- Exercise care to ensure that confidential information, such as salary, benefits payroll, personnel files, and information on disciplinary matters is carefully maintained and managed.
- Do not disclose or discuss confidential beneficiary, provider, contractor, or employee information in any public areas (e.g. elevators, hallways, stairwells, restrooms, lobbies, or eating areas).
- Do not disclose or discuss personal beneficiary, provider, contractor, or staff information.
- Do not divulge, copy, release, sell, loan, alter, or destroy any confidential information except as authorized for LCBH business purposes or as required by law.

Security of Electronic Information

- Practice good workstation security, which includes locking up offices and file cabinets; disposing of all paperwork in appropriate shredding receptacles; and covering all PHI or locking the computer if stepping away from the desk.
- Take appropriate and reasonable measures to protect against the loss or theft of electronic media (e.g., laptops, flash drives, CDs/DVDs, photocopier hard drives, etc.) and against unauthorized access to electronic media that may contain beneficiary PHI. Maintain and monitor security, data back-up, and storage systems.
- Maintain computer passwords and access codes in a confidential and responsible manner. Only allow authorized persons to have access to computer systems and software on a "need-to-know" basis.
- Do not share passwords or allow access to information unless authorized to do so. Transmit electronic confidential information securely in encrypted form.

Employment Practices

- Conduct business with high standards of integrity, honesty, and responsibility. Act in a manner that enhances our standing in the community.
- Employ and contract with employees and business partners who have not been sanctioned by any regulatory agency and who are able to perform their designated responsibilities.
- Provide equal employment opportunities to prospective and current employees, based solely on merit, qualifications, and abilities.

- Do not discriminate in employment opportunities or practices on the basis of race, color, religion, sex, national origin, ancestry, age, physical or mental disability, sexual orientation, veteran status, or any other status protected by law.
- Conduct a thorough background check of employees and evaluate the results to assure that there is no indication that an employee may present a risk for LCBH.
- Acts of intimidation, retaliation or reprisal against any employee who in good faith reports suspected violations of law, regulations, LCBH's *Code of Conduct*, or policies will not be tolerated.
- Provide an open-door communications work environment in which compliance concerns are welcomed and addressed to ensure that the highest quality of care and service is provided.
- Provide appropriate training and orientation so that employees can perform their duties and meet the needs of our beneficiaries, providers, and the communities we serve.

Resolving Issues and Concerns

- Protect the identity of people who call the Compliance Hotline, if they identify themselves, to the fullest extent possible or as permitted by law.
- Evaluate and respond to allegations of wrongdoing, concerns and/or inquiries made to the Compliance Hotline in an impartial manner. All allegations will be thoroughly investigated and verified before any action is taken.
- Take appropriate measures to identify operational vulnerabilities and to detect, prevent, and control fraud, waste, and abuse throughout the organization.
- Report, as appropriate, actual or suspected violations of law and policy to the state or federal oversight agency or to law enforcement.

Investigation and Mitigation of Suspected Violations

As referenced in the LCBH Compliance Plan Component VI: Investigations of Non-Compliance and Mitigation Efforts

“Upon receipt of a report or reasonable indications of suspected non-compliance, the Compliance Officer/Designee will investigate the allegations to determine whether a significant violation of applicable law or the requirements of the Compliance Program has occurred. If so, a Corrective Action Plan (CAP) will be developed to correct and mitigate the compliance issue.”

For additional information refer to the LCBH Compliance Plan.

Staff Questions or Concerns

When seeking guidance and direction concerning a workplace issue or concern, staff are encouraged to consult the LCBH policies and procedures or to contact their immediate supervisor. **Staff may also directly contact the Department's Compliance Officer/Designee at 1-888-257-8375.** Any such contact with the Compliance Officer/Designee may be done so anonymously. All disclosures or reports will be kept confidential, where possible under the law.

LCBH staff members will be protected from any retaliatory acts that may result from reporting, in good faith, possible violations of this Code of Conduct.

Any other questions concerning the Code of Conduct may be directed to the Compliance Officer/Designee.



Lassen County Behavioral Health

CODE OF CONDUCT ACKNOWLEDGEMENT

My signature certifies that I have received and read the Lassen County Behavioral Health Code of Conduct. I understand the contents and I agree to abide by the Code of Conduct as it applies to my job responsibilities. I also understand that a violation of confidentiality is a misdemeanor and might result in a criminal prosecution under Section 10850 of the Welfare & Institution Code.

Date: _____

Printed Name: _____

Signature: _____