

Cornerstone Behavioral Healthcare

PM.14 Employee Conduct

The behavior of Cornerstone Behavioral Healthcare (CBH) employees reflects on the company and its programs. Engaging in activities damaging to CBH, on or off the job, will result in disciplinary action, which may include termination of employment.

CONFLICT OF INTEREST

Conflict of interest is defined as a situation where employees might be tempted to serve their own interests or the interests of others rather than those of the clients or the employer.

CBH employees shall not participate in the award, administration, or evaluation of a contract, grant, or project if they or their immediate family have a direct or indirect interest in the contract, grant, or project including, but not limited to, financial participation or benefits and prospective employment.

It is the policy of CBH that both actual and apparent conflicts of interest shall be avoided. If such a situation arises, the following procedure will be followed:

- Identify the situation as a problem or potential problem
- Review "Code of Conduct" to clarify the situation
- Discuss the situation with the supervisor to get advice on how to handle the situation
- If the supervisor cannot resolve the situation, CEO or designee should be notified
- CEO or designee then will manage the situation

CODE OF CONDUCT

No employee shall engage in any behavior that compromises the professional relationship between CBH and its employees and the individuals CBH is designed to serve. CBH employees will not participate in any non-professional relationship with any client of CBH.

All employees of CBH must be alert to boundary issues. It is the responsibility of the employee to maintain appropriate boundaries with other employees, clients, and their families at all times. Any violation of this policy will result in disciplinary action, up to and including termination of employment.

Employees will not engage in dual or multiple relationships (i.e. professional, social, or business relationships) with coworkers, clients, or former clients whereby there would be a risk of potential harm or exploitation. Dual or multiple relationships are further defined as occurring simultaneously or consecutively. Unfair advantage of a client, former client, or coworker may not be taken to further an employee's personal, religious, political, or business interests.

CBH staff will act in a manner that considers clients' interests primary and protects clients' interests to the greatest extent possible. CBH staff engaging in dual or multiple relationships with a client or former client will be asked to discontinue non-professional aspects of the relationship. A plan for discontinuance will be developed in conjunction with the employee's supervisor. Failure to execute the plan may result in termination of employment. Any dual or multiple relationships involving a sexual relationship with a client or former client will be cause for immediate termination of employment and, if applicable, CBH will report this to the clinician's professional licensing board for violation of their professional license.

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Any CBH employee uncertain if they could be construed to be in a dual or multiple relationships with a client should bring this concern to the attention of their supervisor.

At CBH, employees at all levels of the organization are expected to treat each other with respect at all times. CBH discourages any romantic relationships between coworkers. If a relationship occurs between coworkers in the same department, their direct supervisor must be notified immediately. It is up to their direct supervisor and executive management to determine a course of action. If a relationship occurs, and creates a significant disturbance within CBH, then that is grounds for termination of employment for all involved, at the discretion of management. The success of CBH depends on teamwork among all employees.

1. Gifts, Money, Services, and Gratuities:

CBH employees are prohibited from soliciting and/or accepting money, services and gratuities from contractors, grantees, vendors, or other agencies and firms with which CBH does business. Employees are prohibited from soliciting gifts, but may accept a gift of token value, defined as having a worth of \$10.00 or less.

Employees of CBH are also prohibited from soliciting and/or accepting money, services, or gratuities from persons receiving benefits or services from CBH. Employees are prohibited from soliciting gifts, but may accept a gift of token value, as defined above.

Employees of CBH are prohibited from giving gifts or money to anyone served by CBH, but may extend a gift of token value, as defined above.

2. Confidentiality:

Employees of CBH are bound by a Confidentiality Agreement, found under HIPAA Security Training, a copy of which is attached hereto as Exhibit A.

Employees of CBH shall not divulge to friends, family, clients, contractors, vendors, or others, information which is not available to the general public and which might give that person or entity an advantage in obtaining benefits or services from CBH or the appearance of such.

3. Donations of Time and Money:

CBH encourages its employees, as private citizens, to contribute what they can afford, in time and money, to other community agencies and services.

Since these may be agencies with whom CBH does business and which may serve individuals with eligible disabilities, employees must be careful that there is no confusion or overlap between volunteer activities and work-related responsibilities, and donations of time or money are not perceived as an inducement for special consideration.

4. Service for Fee:

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Employees of CBH are prohibited from offering for a fee the same services that are offered without charge by CBH.

5. Support or Endorsement of Contractors, Vendors, or Grantees:

CBH employees may not represent or support CBH contractors, grantees, vendors, or other agencies or firms in soliciting or securing work or other benefits from other organizations or individuals, or provide an endorsement on CBH behalf without the permission of the CEO.

6. Expenses and Honoraria:

CBH employees shall not accept any speaking engagements without prior authorization of the CEO, if:

- the subject of the speech or discussion pertains to the mission, programs, or activities of CBH or to the responsibilities of the employee in their position at CBH
- the occasion of the speech or discussion is sponsored or hosted by an individual, firm, or organization with whom CBH transacts business

Employees should consult with their supervisors if they have questions about the foregoing policies and their application to projects or activities they are involved in.

7. Outside Employment:

Given the nature of the work environment, outside employment creates a high potential for conflict of interest. Any full-time employee wishing to hold outside employment must obtain prior approval from the CEO or designee.

If conflict of interest is not a potential issue, the CEO or designee may approve such outside employment provided that:

- the employment does not conflict with, or otherwise affect, the employee's performance at CBH
- CBH equipment, office supplies (unless approved by an executive of CBH), or premises are not used in the performance of such outside employment
- the outside employment does not in any other way violate other provisions of the CBH Personnel Manual

Frank Willard

CEO

08/04/2025

Date

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Exhibit A

1. Protected Health Information (PHI): Individually identifiable health information that is created by or received by the organization, including demographic information, that identifies an individual, or provides a reasonable basis to believe the information can be used to identify an individual, and relates to:
 - a. Past, present, or future physical or mental health or condition of an individual
 - b. The provision of health care to an individual
 - c. The past, present, or future payment for the provision of health care to an individual
2. Electronic Protected Health Information (ePHI): Any individually identifiable health information protected by HIPAA that is transmitted by or stored in electronic media.
3. Auditing. CBH may monitor access and activities of all users
4. Workstations may only be used to perform CBH assigned job responsibilities
5. Users may not
 - a. Download software onto CBH's workstations and/or systems without prior approval from the Security Officer or designee
 - b. Alter ePHI maintained in a database, unless authorized to do so as a part of their job responsibilities
 - c. Share their user names nor passwords with anyone
6. Users are required to
 - a. Report unauthorized access to facilities
 - b. Understand their role in CBH's contingency plan
 - c. Report malicious software to the Security Officer or designee immediately
 - d. Report unauthorized attempts, uses of, and theft of CBH's systems and/or workstations
 - e. Report noted log-in discrepancies (e.g. application states user's last log-in was on a date user was on vacation)
 - f. If applicable, set all applications that contain or transmit ePHI to automatically log off after "X" minutes of inactivity
7. Create and change passwords as required by software or website (e.g. PIMSY is required every six months, network is required every ninety days)
8. Supervisors are required to report terminations of workforce members and other outside users
9. Supervisors are required to report a change in a user's title, role, department, and/or location
10. No equipment can be moved without prior authorization from Security Officer. Mobile devices may be carried off-site, if needed, to meet assigned job duties
11. Disks, CDs, hard drives, or other media containing ePHI may not be removed from the premises without prior approval from Security Officer. Once these items are no longer needed, they must be returned to Security Officer for disposal or reissue
12. Outgoing email must be encrypted if it contains ePHI. The following items are PHI identifiers:
 - a. Name
 - b. Address (all geographic subdivisions smaller than state, including street address, city county, and zip code)
 - c. All elements (except years) of dates related to an individual (including birthdate, admission date, discharge date, date of death, and exact age if over 89)
 - d. Telephone numbers
 - e. Fax numbers
 - f. Email addresses

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- g. Social security number
- h. Medical record number
- i. Health plan beneficiary number
- j. Account number
- k. Certificate or license number
- l. Any vehicle or other device serial number
- m. Web URL
- n. Internet protocol (IP) address
- o. Finger or voice print
- p. Photographic image - photographic images are not limited to images of the face
- q. Any other characteristic that could uniquely identify the individual