

PAFACOM, INC.

ETHICS PLAN

2006

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**ETHICS PLAN:  
POLICY MANUAL**

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**AGENCY MISSION & ETHICS STATEMENT**  
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PAFACOM, Inc. is committed to providing services to individuals with special need in a manner that conforms to the highest standards of responsibility and accountability for administration, business, clinical and fiscal management.

PAFACOM, Inc. Mission Statement:

We are committed to enable and support people with developmental disabilities to live their lives as independently as they are able including working, participating and contributing in the everyday activities of life as valued citizens in the community-at-large.

**CONFLICT OF INTEREST STATEMENT  
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PAFACOM, Inc. is committed to conducting all of its business in an ethical manner and within the guidelines that prohibit any and all conflicts of interest. Additionally, the organization adheres to all applicable laws, regulations and standards. Our ethics and conflict of interest standards were created and exist in order to: (1) provide guidance on employee and organizational responsibilities related to compliance with all applicable laws and regulations, and (2) ensure that individual care and business activities are conducted in an objective manner and are not motivated by potential or actual personal or financial benefit.

A conflict of interest is any situation in which financial or other personal considerations may compromise or appear to compromise the following:

- ✓ The business judgment of any employee or other party in which we do business;
- ✓ the overall delivery of service; and
- ✓ the ability of an employee to perform the duties outlined in his or her job.

**A. Code of Ethics & Conflict of Interest Policy Statements**

- ✓ An actual or potential conflict of interest occurs when an individual is in a position to influence a decision that may result in personal benefit for that individual at the expense of the best interest of any of PAFACOM, Inc.'s stakeholders. PAFACOM, Inc. requires that employees and those with whom we do business disclose any actual or potential conflicts of interest and seek guidance on how to handle such situations.
- ✓ PAFACOM, Inc. maintains a written Code of Ethics which provides employees with guidance on expectations for workplace conduct. Every employee of PAFACOM, Inc. is given a copy of this at time of orientation, and a signed copy is placed in the personnel file.
- ✓ The Code of Ethics is thoroughly reviewed with each employee at time of orientation and frequently reviewed throughout the year via in-services, training and departmental meetings.

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- ✓ The Code of Ethics is revised as needed, and at a minimum promotes: (1) honest and ethical conduct; (2) accurate and honest reporting/disclosure activity; (3) individual dignity, respect, fairness and confidentiality as they relate to services/treatment; (4) compliance with applicable laws as they relate to financial transactions; and (5) reporting requirements.
- ✓ The Board of Trustees Audit & Compliance Committee will approve changes to the Code of Ethics and will ensure that all necessary employees receive adequate training on its contents;
- ✓ The Board of Trustees Audit & Compliance Committee is responsible for overseeing investigations of allegations of violations of the organization's code of ethics and/or conflict of interest policy;
- ✓ The Board of Trustees Audit & Compliance Committee has the responsibility of ensuring the independence of auditors and ensuring that the scope of services provided are appropriate and in compliance with corporate compliance policies and procedures;
- ✓ Auditors are prohibited from engaging in non-audit services that may impede auditor independence and/or give the appearance of a conflict of interest, as discussed in Sections 9 & 10;
- ✓ Business with outside entities should not result in extraordinary benefit for those entities, this organization or any employee. Extraordinary benefits may include bribes, product bonuses, special fringe benefits or unusual discounts.

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**CODE OF ETHICS  
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See Attached Code of Ethics. PAFACOM'S Code of Ethics is reviewed with and received by every employee upon hire, with a signed copy maintained in the personnel file.

**CONSUMER CARE  
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PAFACOM, Inc. is committed to individualized and sensitive care for its consumers as well as respect and appreciation for its employees and co-workers. Services to the consumer are provided in such a manner as to foster a sense of dignity, autonomy, safety, positive self-image and an emphasis on individual rights. Any actual or perceived quality of care or consumer rights issues should be reported to any agency supervisor immediately.

- ◆ PAFACOM, Inc. provides consumer services without regard to race, religion, gender, national origin, disability, sexual orientation or economic status.
- ◆ PAFACOM, Inc. provides services to those individuals who have requested such with informed consent by themselves or their guardians. PAFACOM, Inc. informs its consumers of the purpose, benefits, risks, limitations and desired outcomes of service as well as their individual legal rights prior to the start of service.
- ◆ PAFACOM, Inc. respects and encourages the right of its consumers to participate or not participate in program/treatment activities, to include the treatment planning process.
- ◆ PAFACOM, Inc. treats consumers in the least restrictive environment appropriate to the individual's needs.
- ◆ All employees of PAFACOM, Inc. are responsible for ensuring the confidentiality of consumer information.
- ◆ PAFACOM, Inc. staff must be alert to conflicts of interest which may interfere with impartial judgment and sound decision-making in relationships with consumers.
- ◆ PAFACOM, Inc. maintains complete, accurate and legible accounts of care, treatment planning and individual progress that is provided for each consumer.

**BILLING & REPORTING  
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PAFACOM, Inc. consistently represents itself in a fair and honest manner, without exaggerating claims of consumer satisfaction or progress, level of expertise/ability to offer good services, consumer activity/absence or its ability to provide the services identified in contractual agreements. Any actual or perceived billing or reporting irregularity should be reported to any supervisor, Executive Management or the Corporate Compliance Officer.

- ◆ PAFACOM, Inc. bills the correct provider for the correct amount, for the appropriate service on behalf of the right consumer.
- ◆ PAFACOM, Inc. uses the appropriate billing codes that most accurately describe the service and time provided to the consumer.
- ◆ PAFACOM, Inc. accurately completes and submits attendance reports for each program element.
- ◆ PAFACOM, Inc. prepares and maintains all billing records accurately, reliably, honestly and in accordance with established accounting and billing policies and procedures.
- ◆ PAFACOM, Inc. accurately reports all units of contact and level of service information to funding sources.
- ◆ Internal controls which monitor PAFACOM's billing practices are assessed annually by an independent auditor.

**SAFETY & ENVIRONMENT OF CARE  
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PAFACOM, Inc. is committed to a safety program that promotes consumer and employee safety and the maintenance of a safe, pleasant and functional environment for everybody. Any actual or perceived safety or environment of care issue should be reported to any agency supervisor, Executive Management or the Safety Committee.

- ◆ PAFACOM, Inc. expects all employees to be conscientious regarding safety issues. It is every employee's responsibility to maintain safe conditions and to participate in and pass along safety awareness to one another and to consumers.
- ◆ PAFACOM, Inc. employees are responsible for using the agency's safety incident reporting procedures to:
  - (1) inform funding sources of reportable incidents as required;
  - (2) allow the Safety Committee to make recommendations for improvement; and
  - (3) allow the QA Coordinator to analyze trends and respond with systematic improvements.
- ◆ Every employee is responsible for knowing and understanding PAFACOM's safety/ fire safety policies and procedures and their function in each of them.
- ◆ Employees, consumers and visitors are prohibited from smoking in any PAFACOM facility.
- ◆ PAFACOM, Inc. employees are responsible for participating in the agency's safety and environmental management policies and assist in providing an environment that is free of violence, disruption, theft and unauthorized access to all sensitive areas and confidential information.

**HUMAN RESOURCES  
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PAFACOM, Inc. greatly values all of its employees appreciates the diversity, passion, caring and experience they bring to the agency. To that end, PAFACOM, Inc. maintains a work environment that respects the rights and dignity of all its employees. It is the policy of PAFACOM, Inc. to provide a workplace that is free from all forms of discrimination.

Any actual or perceived discrimination, mistreatment or illegal employment activity which occurs within the agency must be reported to an agency supervisor, the Human Resource Department or Executive Management immediately.

- ◆ PAFACOM, Inc. complies with all employment rules and regulations as defined by state, federal and local guidelines.
- ◆ Sexual harassment or any other form of physical, verbal or mental abuse WILL NOT be tolerated.  
*\*Please refer to the complete sexual harassment policy in the personnel handbook.*
- ◆ PAFACOM, Inc. makes no discrimination in its selection, assignment, compensation, promotion or other employment practices. No person is excluded from employment because of race, creed, ethnic origin, religion, age, gender, sexual orientation, national origin, disability or marital status.
- ◆ No employee of PAFACOM, Inc. may commit any act of abuse, neglect or exploitation against a consumer. the penalty for committing any one of these violations is immediate termination and any legal ramifications that may apply. Employee actions in defense of self or others must be in accordance with the principle of least restrictive action necessary, and within the framework of the agency's approved crisis management system.  
*\*See Training Center Manual, Residential Manual and Personnel Handbook for complete policy.*
- ◆ PAFACOM, Inc. will not tolerate any employee knowingly making a false accusation against another employee. Knowingly making a false accusation against another employee will result in disciplinary action, up to and including termination.
- ◆ PAFACOM, Inc. encourages employees to improve their performance and knowledge base through further education, attending seminars (internal and external), conferences, continuing education and in-service training.
- ◆ PAFACOM, Inc. maintains staff competencies by means of training and education and adherence to accreditation and licensing mandates.

**INFORMATION MANAGEMENT  
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PAFACOM, Inc. is committed to safeguarding the privacy and confidentiality of both consumers and employees. It is recognized that ensuring confidentiality is critical to the programming element, is an integral part of the treatment planning process, mandated by our funding sources and is the responsibility of every employee. We also comply with all federal, state and local regulations pertaining to the management of information. Any actual or perceived misuse of data or information management resources should be reported to any agency supervisor, the Human Resource Department, the Corporate Compliance Officer or Executive Management immediately.

- ◆ Due to the sensitive nature of information contained in consumer records, PAFACOM, Inc. requires all employees to maintain the highest standards for confidentiality. All consumer data-paper, computer and verbal-must be kept confidential.
- ◆ All open and closed consumer records are to be maintained in a locked/secure area at all times; all current and former employee records must be maintained in a secure area within the Human Resource Office.
- ◆ It is the responsibility of every employee using the PAFACOM, Inc. computer network to assist in maintaining security by: using passwords, screensavers and placing the monitors away from the common areas.
- ◆ PAFACOM, Inc. strictly prohibits making unauthorized copies of any computer software licensed to the agency as well as any other violation of federal copyright laws.
- ◆ PAFACOM, Inc. minimizes the risk of spreading a computer virus on the network by verifying diskettes containing software or data from outside sources with a virus scan program. Any employee bringing diskettes from outside sources to PAFACOM, Inc. must first turn the disk over to the appropriate staff for verification before using the diskette on PAFACOM, Inc. resources.
- ◆ All communications transmitted by, received from or stored in the computer systems of PAFACOM, Inc. are agency property. PAFACOM, Inc. employees have no expectation of privacy with respect to e-mail.

**PUBLIC RELATIONS/MARKETING  
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PAFACOM, Inc. conducts all public relations, including marketing in the most appropriate, tasteful and accurate manner. Services provided by the agency are presented factually and without exaggeration or misinformation.

- ◆ No photographs or written information regarding consumers is ever used without the appropriate, signed consent forms, parent/guardian permission as necessary, release of information forms and any other documentation as required by law.
- ◆ Agency manuals, plans, board information and policies and procedures are available for review by perspective consumers and family members.
- ◆ No aspect of consumer or employee confidentiality is ever compromised throughout the public relations or agency marketing process.

**CONTACT INFORMATION  
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Corporate Compliance Officer

Joanne Zieger.....(856) 696.1661, ext. 202  
[jzieger@pafacom.org](mailto:jzieger@pafacom.org)

Human Resource Department

Constance Lewoc or Michelle Vernamonti.....(856) 696.1661, ext. 201  
[clewoc@pafacom.org](mailto:clewoc@pafacom.org)  
[mvernamonti@pafacom.org](mailto:mvernamonti@pafacom.org)

Safety Committee

Christina Gleeson.....(856) 696.1661, ext 223  
[cgleeson@pafacom.org](mailto:cgleeson@pafacom.org)

Agency Supervisors

Administrative Office.....(856) 696.1661