
Business Ethics and Conduct

Purpose:

BHR is committed to operate all activities within the spirit and letter of all laws and regulations affecting its business and employees.

Procedure:

Commitment to Clients

Our primary responsibility is to promote the well-being of clients. In general, clients' interests are primary. However, our responsibility to the larger society or specific legal obligations may on limited occasions supersede the loyalty owed clients, and clients should be so advised.

Self-Determination

We respect and promote the right of clients to self-determination and assist clients in their efforts to identify and clarify their goals. We may limit clients' right to self-determination when, in the clinician's professional judgment, clients' actions or potential actions pose a serious, foreseeable, and imminent risk to themselves or others.

Informed Consent

We should provide services to clients only in the context of a professional relationship based, when appropriate, on valid informed consent. We should use clear and understandable language to inform clients of the purpose of the services, risks related to the services, limits to services because of the requirements of a third-payer, relevant costs, reasonable alternatives, clients right to refuse or withdraw consent, and the time frame covered by the consent. Clinician's should provide clients with an opportunity to ask questions.

Competence

We should provide services and represent ourselves as competent only within the boundaries of our education, training, license, certification, consultation received, supervised experience, or other relevant professional experience.

Cultural Competence and Social Diversity

In our work-related activities, we do not engage in unfair discrimination based on age, gender, gender identity, race ethnicity, culture, national origin, religion, sexual orientation, disability, socioeconomic status, or any basis proscribed by law.

We should have a knowledge base of our clients' cultures and be able to demonstrate competence in the provision of services that are sensitive to clients' cultures and to differences among people and cultural groups.

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Sexual Harassment

We do not engage in sexual harassment. Sexual harassment is sexual solicitation, physical advances or verbal or nonverbal conduct that is sexual in nature, that occurs in connection with our activities or roles as a mental health professional and that either (1) is unwelcome, is offensive or creates a hostile workplace or educational environment and we know or are told this or (2) is sufficiently severe or intense to be abusive to a reasonable person in the context. Sexual harassment can consist of a single incident of a severe act or of multiple persistent or pervasive acts.

Conflicts of Interest

We should not take unfair advantage of any professional relationship or exploit others to further our personal, religious, political, or business interests. We do not refer consumers into the private professional practices of BHR employees.

We should be alert to and avoid conflicts of interest that interfere with the exercise of professional discretion and impartial judgment. We should inform clients when a real or potential conflict of interest arises and take reasonable steps to resolve the issue in a manner that makes the clients' interests primary and protects clients' interests to the greatest extent possible. In some cases, protecting clients' interests may require termination of the professional relationship with proper referral of the client.

Personal Fundraising

Employees shall not engage in coercive solicitation of coworkers such as seeking donations, encouraging purchases, or taking a position on an issue outside the workplace. Employees receiving unwanted solicitations are encouraged to address the issue with their coworker and/or report the matter to their supervisor.

Affirmative Statement on Incentives in relationship to clinical decisions

UM decision making is based only on appropriateness of care and service and existence of coverage. BHR does not specifically reward practitioners or other individuals for issuing denials of coverage or services. Financial incentives for UM decision makers do not encourage decisions that result in underutilization.

Exchange of Gifts, Money, and Gratuities

BHR and its employees must strive to act in a manner that is in the best interest of the organization. Selections of vendors or suppliers, as well as, purchasing decisions must always be made on the basis of evaluating and comparing price, quality, performance and suitability. Decisions are not to be influenced by any other factor, such as personal relationships, gifts, hospitality or anything else of direct or indirect value. Employees should not have any reason to accept money or gratuities from clients, external agencies, funders or other vendors. If an employee receives a gift during service for the agency from an external vendor or referral source, the gift should be turned in to the employee's supervisor and be considered a donation.

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Confidentiality

We will respect the confidential information shared by colleagues in the course of their professional relationships and transactions. We respect clients' right to privacy. We should not solicit private information from clients unless it is essential to providing services or conducting an evaluation. Once private information is shared, standards of confidentiality apply.

We may disclose confidential information when appropriate with valid consent from a client or a person legally authorized to consent on behalf of the client. The general expectation that we will keep information confidential does not apply when disclosure is necessary to prevent serious, foreseeable, and imminent harm to a client or other identifiable person. In all instances, we will disclose the least amount of confidential information necessary to achieve the desired purpose; only information that is directly relevant to the purpose for which the disclosure is made should be revealed.

Business and Marketing

We will always represent the services and staff of BHR accurately. We will not promise to deliver services we cannot provide nor will we falsely represent the qualifications of the staff at BHR.

We will engage in fair business practices demonstrating respect for our competitors. We will not make disparaging remarks about our competitors nor will we misrepresent them and/or their products. In all of our business dealings we will be fair and honest.

Human Resources

BHR is committed to a diverse workforce. We will not discriminate in our hiring practices on the basis age, gender, gender identity, race ethnicity, culture, national origin, religion, sexual orientation, disability, socioeconomic status, or any basis proscribed by law. We are committed to a workplace that appreciates and nurtures diversity.

Contractual Relationships

BHR will sign only those contracts in which they can deliver quality services. We will refrain from entering contractual relationships with organizations we believe do not adhere to the same ethical standards that we adhere to. We will fairly represent BHR and its services in all contractual arrangements.

We will refrain from entering contracts with organizations we believe practice discrimination, treat their employees or customers unfairly, or who have demonstrated dishonesty in their business practices.

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Professional/Corporate Responsibility

All BHR employees shall take care to avoid any conduct by word or deed that could reasonably appear to be improper or might injure BHR's reputation. In general, the use of good judgment, based on high-ethical principles, will guide you with respect to lines of acceptable conduct. If a situation arises where it is difficult to determine the proper course of action, the matter should be discussed openly with your immediate supervisor and, if necessary, with a human resources representative for advice and consultation.

BHR has a corporate communications line for reporting any violations of the code of ethics. All calls to this line are confidential and will be investigated within seven days by the Corporate Compliance Officer. The Corporate Communications line number is 1-877-387-2644. Whenever an alleged violation is reported, it is documented on a report log and investigated by the Corporate Compliance Officer.

Whatever the concern, there is an appropriate resource within BHR. Additionally, the Board of Directors are committed to providing avenues through which such issues may be raised, reviewed, and in every possible instance, resolved.

Compliance with this policy of business ethics and conduct is the responsibility of every BHR employee. Disregarding or failing to comply with this standard of business ethics and conduct could lead to disciplinary action, up to and including possible termination of employment.

Prohibition of Waste, Fraud, Theft Abuse, and other Wrongdoing

To safeguard the ethical, organization and financial well-being and reputation of BHR, the organization has a duty to conduct its affairs in a professional, ethical, responsible, and transparent way and to follow applicable laws, regulations contract requirements, and standards. We operate in good faith and take all reasonable steps to prevent, detect, investigate, and address any fraud, waste, theft, abuse, or any other wrongdoing.

Personal Property

All personnel shall respect and safeguard the personal property of clients, visitors, and other personnel as well as the property of BHR. Employees will not use or allow the use of BHR property or equipment for other than activities approved by the organization. Theft and destruction of property may be addressed through treatment planning (clients), disciplinary action (personnel), and/or by contacting law enforcement, as appropriate. BHR is not responsible for personal property that is not safeguarded or is left unattended.

Setting Boundaries

BHR employees should not engage in dual or multiple relationships with clients or former clients, in which there is a risk of exploitation or potential harm to the client. In instances when dual or

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multiple relationships are unavoidable, agency staff should take steps to protect clients and are responsible for setting clear, appropriate and culturally sensitive boundaries.

Witnessing of Documents

Employees who are certified as Notary Publics may witness documents such as Power of Attorney, guardianship, advance directives, and/or agency contacts for clients, personnel, and other stakeholders in accordance with applicable state laws. The person who witnesses a document should be neutral and have no financial or other interest involved.

BHR has a policy of no retaliation for the reporting of a suspected violation of the code of ethics. If the reported violation is unfounded there will be no reprisal to the person reporting as long as the report was made in good faith.