

ADVANCED COUNSELING SERVICES, P.C.

Code of Ethics

The Code of Ethics to which Advanced Counseling Services subscribes includes the following areas:

- Business
- Marketing
- Contractual Relationships
- Conflict of Interest
- Service Delivery
- Professional Responsibilities
- Human Resources
- Prohibition of Fraud, Waste and Abuse
- Written Procedures of Address Allegations of Violations of Ethical Codes
- Education of Ethical Codes for Personnel and Other Stakeholders
- Advocacy Efforts
- Protocol Regarding Media Relations and Social Media

Marketing and Business Practices – Advanced Counseling Services demonstrates:

- Ethical practices in marketing and business activities, including marketing only those programs and services it can provide, charging for only those services delivered, and maintaining appropriate records.
- That services are based on an individual's needs no matter what the arrangement is for payment for services.
- Only patients meeting Advanced Counseling Services Admission criteria are admitted to treatment.
- All marketing activities and promotional literature accurately describe the services available at Advanced Counseling Services.
- No fees are paid to anyone for referrals to Advanced Counseling Services.
- Regardless of the method of payment or any financial benefits to the organization, its leaders, administrators, or clinical staff, clinical decisions are based on the identified health care needs of persons seeking services from Advanced Counseling Services.
- Patients and third-party payors are billed for only the services that have been provided to or on behalf of patients or their families. Accurate billing at established rates and conditions (e.g., charges for missed appointments regarding which persons served have been informed) is a priority.

Contractual Relationships

Advanced Counseling Services contracts with individuals to provide specific services. The clinical staff is largely comprised of independent contractors that go through a rigorous application and credentialing process and sign a contract that delineates the responsibilities of each party. Proper credentials, proof of insurance, and skills appropriate to the position are required. The contractors must also go through a thorough orientation that includes training in a variety of areas. Contractual agreements must be approved by the CEO. Contractors must subscribe to Advanced Counseling Services' Code of Ethics.

Conflict of Interest

All staff members (i.e., employees and contractors) are bound by principles regarding the avoidance of conflict of interest.

- Staff members are required to avoid participating in any activities related to patients and/or their care that might bias or cause the appearance of bias as a result of staff involvement on a personal basis with patients or processes beyond that which is considered usual and customary by community and professional standards in providing professional and other clinic related services.
- Conflict of interest may result in disciplinary action up to and including termination of employment or termination of contract.
- A conflict of interest exists in, but is not limited to, the following situations:
 - A clinical staff member reviewing his/her own cases in Quality of Care activities.
 - A staff member being personally involved in a dual relationship with a patient or any involvement with a patient outside of a generally accepted clinical/clinic relationship.
 - A staff member having monetary or financial involvement with a patient above and beyond their assigned duties.
 - An employee engaging in supplementary employment during normally scheduled work hours at their duties for Advanced Counseling Services.
 - A staff member holding any financial interest in a company that provides services, supplies, materials, or equipment to Advanced Counseling Services.
 - A staff member accepting any gift or favor for himself/herself or for any member of his/her immediate family from an outside organization or individual which exceeds that which is normally associated with a prudent business/professional relationship.

- Misusing, or disclosing to anyone outside of the organization, information to which the staff member has access by reason of his/her position.
 - A staff member engaging in supplemental employment at or by another mental health and/or substance abuse treatment organization or facility which is in direct competition with Advanced Counseling Services and where the competitive organization and/or the staff member are directly or indirectly profiting from the employee's position at Advanced Counseling Services.
 - A clinical staff member whose contract is terminating attempting to transfer patients to that clinician's private practice or future practice at or with another organization unless, in the sole discretion of Advanced Counseling's Governing Authority, the needs of the patient will be best served by such a transfer.
- Conflict of interest issues relating to contractors essentially focus on whether contractors engage in any activity that might compromise or jeopardize the integrity of Advanced Counseling Services or its Governing Authority, and any activity considered to be a conflict of interest by the clinician's national professional organization.
 - By virtue of their being contractors, clinicians who work for Advanced Counseling Services in a contractual capacity are entitled to work as clinicians or in other positions for other organizations, or in a self-employed capacity.
 - Transfer by a contractor clinician, while working at Advanced Counseling Services, to another practice of any patient being seen on behalf of or under the auspices of Advanced Counseling Services is considered a conflict of interest and a breach of contract.

Service Delivery

- Personnel follow the person-centered planning and service delivery philosophy.
- Orientation of all efforts toward the primary goal of the patient's recovery.
- Respect for the confidentiality of all records, materials, and communications concerning patients.
- No discrimination among patients or staff on the basis of culture, age, gender identification, sexual orientation, spiritual beliefs, socioeconomic status, or language.
- Respect for the organization's policies and procedures, and cooperates with management functions.
- Evidence of genuine interest in helping persons with mental health and/or substance abuse problems, and dedication to helping those persons help themselves as much as possible.
- Personnel shall not engage in personal fundraising with persons served.

- Personnel shall not act as a witness to documents such as Power of Attorney, guardianship, advanced directives, and/or company contracts without the expressed written approval of the CEO or COO.

Clinical decisions, including tests, treatments, and other interventions are based on an individual's health care needs no matter what the arrangement for compensation. Clinical staff will:

- Show willingness to assess one's own personal and vocational strengths and limitations, biases, and to refer the patient to another qualified individual or program, or to release him/her from treatment.
- Show commitment to providing the highest quality, continuous care of patients through both personal effort and the utilization of any other health professionals or services which may assist the patient in his/her treatment and recovery.
- Consistently demonstrate acceptable, current skills as evidenced in Quality and Performance Improvement processes, and through continuing professional education.
- Not conduct research, experiments, or clinical trials involving any of its patients.
- Not have patients work in any capacity for Advanced Counseling Services and not permit its employees to have patients work for them in any capacity.
- Follow established policies and procedures for patients voicing complaints.
- Follow established policies and procedures regarding the confidentiality of patient information.
- Provide and communicate a continuity of care plan for the patient if the clinical staff member stops providing services at Advanced Counseling Services for any reason.

Professional Responsibilities and Conduct – All staff members must demonstrate:

- Respect for the confidentiality of all records, materials and communications concerning the persons served. Under no circumstances can protected health information be removed from the premises of Advanced Counseling Services by contractors, employees, or any third party without the expressed written consent of the CEO or their designee.
- Respect for persons served by maintaining an objective, professional relationship at all times, and establishing and maintaining appropriate boundaries.
- No discrimination toward persons served or staff members on the basis of culture, age, gender identification, sexual orientation, spiritual beliefs, socioeconomic status, or language.
- A dedication to helping persons with life adjustment problems learn to help themselves as much as possible.

- Current skills and knowledge from participating in continuing growth and development.
- Respect for the organization's policies and procedures and demonstrate personal behavior that is above reproach.
- A genuine interest in helping persons with substance abuse, mental health and/or life adjustment problems.
- No conflict of interest that is real or implied.
- Personnel shall not use the organization's property for personal use.
- Personnel are prohibited from accepting money, exchanging gifts, gratuities, or other consideration from anyone other than Advanced Counseling Services for the performance of any act that he/she would be required or expected to render in the regular course of his/her duties.
- Staff may not engage work related fundraising without the expressed written consent of the CEO. Personal non-work related fundraising within the office such as cookie or candy sales may be done with the approval of the Office Manager.
- Personnel, as appropriate, shall respect and safeguard the personal property of the persons served, visitors, and all property of the organization.
- Compliance with federal fraud, waste, and abuse policies as well as federal Red Flag Rules.

Clinical Practices – At Advanced Counseling Services:

- The services offered are oriented toward the primary goal of the recovery of the persons served.
- Clinical decisions, treatment, recommendations, discharge decisions, and other interventions are based on individual needs and the best interest of the person served.
- There is a commitment to providing the highest quality of care for the persons served through both personal effort by staff members and the utilization of any other resources that may assist the persons served in their treatment, recovery and/or resolution of problems.

Human Resources

Advanced Counseling Services is an at-will employer. Employees can refer to the employee handbook and the Policies and Procedures Manual for detailed and comprehensive information regarding HR issues. Contractors can refer to the Policy and Procedure Manual as well as their Professional Service Contract.

Prohibition of Fraud, Waste and Abuse

Advanced Counseling Services provides annual training on the prevention of fraud, waste and abuse. Personnel are encouraged to report and suspicion or evidence of fraud, waste,

abuse, or other wrongdoing to their immediate supervisor, Site Administrator, or Corporate Compliance Officer.

Written Procedures to Deal with Allegations of Violations of Ethical Codes

Staff members are encouraged to report and perceived ethical violations to their Site Administrator who will share this information with The Management Team. In the event that the ethical violation has been made by the Site Administrator, or member of the Management Team, the staff member can direct the complaint to the CEO through the Business Office. Advanced Counseling Services has a no reprisal approach for all personnel reporting.

The Management Team will review the ethical conduct violation report within 48 hours of its submission. The Management Team will perform an investigation of the alleged violation and will make a recommendation regarding further action within one week. Corrective action may include training, supervision, disciplinary action, termination, and/or notifying the state licensing board.

All complaints, investigations and actions will be documented and maintained by The Corporate Compliance Officer.

Advocacy Efforts for the Persons Served and Corporate Citizenship

Advanced Counseling Services advocates for the persons served, personnel, and other stakeholders. Advocacy efforts include participating in public education and activities that promote the elimination of stigma and discrimination for the persons served.

Advanced Counseling Services donates time and resources at health fairs, sponsoring community sports teams, through providing reasonable accommodations to create equal opportunities for staff.

Protocol Regarding Media Relations and Social Media

The Chief Executive Officer and his/her designee are the only individuals authorized to communicate with the media, unless otherwise authorized by the CEO in writing. All press releases and other communications to the media must be approved by the CEO prior to dissemination. The posting of information regarding the organization on the organizations website, Facebook, Twitter, blogs, etc. must be approved by the CEO or designee.

Personnel shall not post information regarding the persons served or on social media. Since social media is not a secure or confidential form of communication, it is the policy

of Advanced Counseling Services that personnel may not communicate or befriend a consumer utilizing social media. Any violation of this protocol will prompt a Corporate Compliance investigation. If you discover that you were unknowingly or unintentionally communicating with a consumer, either past or present, please submit an Incident Report to the Corporate Compliance Officer.