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SUBSTANCE ABUSE POLICY

POLICY:

DSDC is committed to providing a safe work environment and to fostering the well-being and health of its employees and people supported. That commitment is jeopardized when any agency employee illegally uses drugs on or off the job, comes to work under their influence, possesses, distributes or sells drugs in the workplace, or abuses alcohol on the job. Therefore, DSDC has established the following policy, pursuant to Tennessee Code Annotated, Section 50-9-100 et. seq.

PRACTICE:

1. It is a violation of agency policy for any employee to use, possess, sell, trade, offer for sale, or offer to buy illegal drugs or otherwise engage in the illegal use of drugs on or off the job.
2. It is a violation of agency policy for any employee to report to work under the influence of or while possessing in his or her body, blood or urine, illegal drugs in any detectable amount.
3. It is a violation of agency policy for any employee to report to work under the influence of or impaired by alcohol.
4. It is a violation of the agency policy for any employee to use prescription drugs illegally, i.e., to use prescription drugs that have not been legally obtained or in a manner or for a purpose other than as prescribed. However, nothing in this policy precludes the appropriate use of legally prescribed medications.
5. Employees using prescription drugs according to a physician's instructions or using over-the-counter drugs for medicinal purposes should, in the event such drugs would impair their physical, mental emotional, or other faculties, notify their team manager prior to reporting to work.
6. As a condition of employment, any employee convicted of violating a criminal drug statute must inform DSDC in writing of such conviction (including pleas of guilty or nolo contendere) no later than five (5) calendar days after such conviction.
7. Violations of this policy are subject to disciplinary action up to and including termination.

EMPLOYEE ASSISTANCE PROGRAM (EAP)

DSDC offers resource information on various means of employee assistance in our community, including but not limited to drug and alcohol abuse programs. Employees are encouraged to use this resource file; which is located in the Coordinator of Human Resources office. This information will be distributed to employees for their confidential use upon request.

GENERAL PROCEDURES

Any employee reporting to work visibly impaired will be deemed unable to perform required duties and will not be allowed to work. If possible, the employee's supervisor will first seek another administrator's opinion to confirm the employee's status. Next, the supervisor will consult privately with the employee to determine the cause of the observation, including whether substance abuse is involved. If, in the opinion of the supervisor, the employee is considered impaired, the employee will be sent home or to a medical facility by taxi or other safe transportation alternative - depending on the determination of the observed impairment - and accompanied by the supervisor or another employee if necessary. A drug or alcohol test may be in order. An impaired employee will not be allowed to drive.

OPPORTUNITY TO CONTEST OR EXPLAIN TEST RESULTS

Employees and job applicants who have a positive confirmed drug or alcohol test result may explain or contest the result to the medical review officer within five (5) working days after receiving written notification of the test result from the medical review officer. If an employee's or job applicant's explanation or challenge is unsatisfactory to the medical review officer, the medical review officer shall report a positive test result back to the agency. A person may contest the drug test result pursuant to rules adopted by the Tennessee Department of Labor.

CONFIDENTIALITY

The confidentiality of any information received by the employer through a substance abuse testing program shall be maintained, except as otherwise provided in law.

JOB APPLICANT DRUG TESTING

1. All job applicants at DSDC will undergo testing for substance abuse as a condition of employment. Any applicant with a confirmed positive test result will be denied employment.
2. Applicants will be required to submit voluntarily to a urinalysis test at a laboratory chosen by this agency, and by signing a consent agreement will release this agency from liability.
3. If the physician, official, or lab personnel have reasonable suspicion to believe that the job-applicant has tampered with the specimen, the applicant will not be considered for employment.

EMPLOYEE DRUG TESTING

The agency has adopted testing practices to identify employees who illegally use drugs on or off the job or who abuse alcohol on the job. It shall be a condition of employment for all employees to submit to substance abuse testing under the following circumstances:

1. When there is a reasonable suspicion to believe that an employee is illegally using drugs or abusing alcohol. “Reasonable suspicion” is based on a belief that an employee is using or has used drugs or alcohol in violation of the agency’s policy drawn from specific objective and articulable facts and reasonable inferences drawn from those facts in light of experience. Among other things, such facts and inferences may be based upon, but not limited to, the following:
 - a) Observable phenomena while at work such as direct observation of substance abuse or of the physical symptoms or manifestations of being impaired due to substance abuse;
 - b) Abnormal conduct or erratic behavior while at work or a significant deterioration in work performance;
 - c) A report of substance abuse provided by a reliable and credible source;
 - d) Suspected misuse or mis-administration of medication prescribed for people supported;
 - e) Evidence that an individual has tampered with any substance abuse test during his or her employment with the agency;
 - f) Information that an employee has caused or contributed to an accident while at work; or
 - g) Evidence that an employee has used, possessed, sold, solicited, or transferred drugs while working or while on the agency’s premises or while operating an agency vehicle or equipment.
2. When employees have caused or contributed to an on-the-job injury that resulted in a loss of work-time, which means any period of time during which an employee stops performing the normal duties of employment and leaves the place of employment to seek care from a licensed medical provider. The agency may send employees for a substance abuse test if they are involved in on-the-job accidents where personal injury or damage to agency property occurs.
3. When an employee is involved in any moving vehicle accident while operating the vehicle, regardless of fault.
4. As part of a follow-up program to treatment for drug abuse.

5. As part of a random testing process involving all agency employees.
6. Substance abuse testing will include a urinalysis screen for the following drugs:
 - a) Amphetamines: ‘speed’, ‘uppers’, etc.
 - b) Barbiturates: ‘downers’, ‘yellow jackets’, ‘reds’, etc.
 - c) Benzodiazepines: ‘downers’, ‘sleeping pills’, etc.
 - d) Cannabinoids/Marijuana Metabolites: THC, marijuana, Hash, ‘pot’, ‘grass’, ‘weed’, etc.
 - e) Cocaine Metabolites: ‘coke’, ‘crack’, etc.
 - f) Methadone: ‘dollies’, ‘Amidone’, etc.
 - g) Methaqualone: ‘Lude’, ‘Quad’, ‘Mandrex’, etc.
 - h) Opiates: Narcotics, Heroin, Codeine, Morphine, ‘smack’, ‘dope’, etc.
 - i) Phencyclidine: PCP, ‘angel dust’
 - j) Propoxyphene: Darvon
7. Substance abuse testing will include drawing a blood sample or breathalyzer test for:
 - a) Alcohol: (not required for job applicant testing)
 - b) Any ‘Alcoholic Beverage’, all liquid medications containing ethyl alcohol (ethanol). Please read the label for content. For example; Vicks Nyquil™ is 25% (50 proof) ethyl alcohol. Comtrex™ is 20% (40 proof), Contac Severe Cold Formula Night Strength™ is 25% (50 proof) and Listerine™ is 26.9% (54 proof).

ALCOHOL

The consumption or possession of alcoholic beverages on the agency’s premises is prohibited. (Agency sponsored activities which may include the serving of alcoholic beverages are not included in this provision.) Such consumption or possession is misconduct and shall be subject to discipline up to and including termination.

REFUSAL TO SUBMIT

Failure to submit to a required substance abuse test also is misconduct and shall be subject to discipline up to and including termination.

INFORMATION FOR JOB APPLICANTS AND EMPLOYEES

When an employee or job applicant submits to a drug and/or alcohol test, they will be given a form by the specimen collector that contains a list of common medications and substances which may alter or affect the outcome of a drug or alcohol test. This form will also have a space for the donor to provide any information that he/she considers relevant to the test, including the identification of currently or recently used prescription or non-prescription medication or other relevant information. The information form should be kept by the job applicant or employee for their personal use. If the job applicant or employee has a positive confirmed test result, a medical review officer will attempt to contact the individual in order to privately discuss the findings with that person. The job applicant or employee should keep the form as a reminder to discuss this information at that time. The medical review officer will take this information into account when interpreting any positive confirmed test results. The information provided shall be treated as confidential and will not be given to the employer. Employees and job applicants have the right to consult with a medical review officer for technical information regarding prescription and non-prescription medicine. It is the responsibility of every employee or job applicant to notify the testing laboratory of any administrative or civil action brought pursuant to TCA Section 50-9-100 et. seq., Drug-Free Workplace Programs.

USE OF TOBACCO PRODUCTS – SMOKE FREE AGENCY

POLICY:

The agency is a smoke-free agency and maintains smoke-free/tobacco-free environments. Because of concern for the total health of individuals supported and agency staff, and due to the awareness that second hand smoke is detrimental to the health of non-smokers staff shall not smoke while on duty or on agency property.

PRACTICE:

1. The use of tobacco products including, but not limited to cigarettes, cigars, pipes, and smokeless tobacco, is prohibited inside any of the organization's facilities, grounds, vehicles, or personal vehicles in use on agency business.
2. The use of an electronic cigarette (e-cig or e-cigarette), personal vaporizer (PV) or electronic nicotine delivery system (ENDS) is prohibited inside any of the organization's facilities, vehicles, or personal vehicles in use on agency business.
3. The use of tobacco products or electronic substitutes will **not** be allowed for any staff while clocked-in and on duty with the agency.
4. This policy relates to all work areas at all times, including before and after normal working hours.
5. Violation of this policy will result in corrective action.

HARASSMENT AND/OR DISCRIMINATION

POLICY:

The agency strives to maintain a workplace that fosters mutual employee respect and promotes harmonious, productive working relationships. The organization believes that discrimination and/or harassment in any form constitutes misconduct that undermines the integrity of the employment relationship. Therefore, the agency prohibits discrimination and/or harassment that is sexual, racial, or religious in nature or is related to anyone's race, color, creed, ancestry, national origin, age, sex (including pregnancy), sexual orientation, or disability. This policy applies to all employees throughout the organization and all individuals who may have contact with any employee of this organization. Furthermore, the agency will make reasonable accommodations for qualified individuals with known disabilities unless doing so would result in an undue hardship.

PRACTICE:

1. The agency will maintain a workplace free of harassment of any kind and from any source (management, coworkers, or visitors), while treating all complaints fairly and evenhandedly in order to prevent frivolous or malicious accusations.
2. Sexual harassment means any physical or verbal conduct of a sexual nature as well as repeated and unwanted sexual requests and advances. The specific behaviors that are prohibited include but are not limited to:
 - a) Repeated, offensive sexual flirtation, advances, propositions;
 - b) Continued or repeated verbal abuse of a sexual nature;
 - c) Graphic verbal commentaries about an individual's body or dress;
 - d) Offensive comments, jokes, or suggestions about another employee's gender or physical attributes;
 - e) Lewd or obscene jokes and gestures;
 - f) Leering, pinching, patting, and swearing, particularly when sexual terms are used;
 - g) Sexually offensive and/or explicit posters, photos, internet sites, etc., at the workplace;
 - h) Unwelcome questions or discussions about one's personal sex life;

- i) Open display and/or discussion of sexual relations between management and non-management employees, especially when connected to any type of favoritism toward the non-management employee involved;
 - j) Social invitations accompanied by discussion of terms or conditions of employment or a performance evaluation;
 - k) Use of degrading, derogatory, or slang terms such as “honey”, “sweetie”, “doll”;
 - l) Requests or instructions that clothing be worn for sexual effect;
 - m) An employee who files a complaint and/or refuses sexual favors is free from reprisals such as escalation of the harassment, poor work assignments, sabotaging of work, sarcasm, unsatisfactory job evaluations, threatened demotions and transfers, denial of promotions and benefits, dismissal, and poor job references.
3. The agency also expressly prohibits any form of employee harassment based on race, color, religion, sex, national origin, age, disability, sexual orientation or status in any group protected by state or local law. Terms that are likely to arise in connection with complaints of harassment include:
- a) Discrimination – Employment decisions implicitly or explicitly based on facts other than job-related considerations or treating one employee differently merely on the basis of a protected characteristic.
 - b) Harassment – Repeated, unwanted or unwelcome verbalisms or behaviors of a sexist, racist, or ageist nature or with overtones related to a protected characteristic (e.g., sex, race, ethnicity, religion, age, disability, or military status).
 - c) Hostile environment – Conduct that has the purpose or effect of unreasonable interfering with a person’s job performance or creates an intimidation or offensive work environment.
 - d) Quid-pro-quo sexual harassment – 1) Making submission to sexual demands an implicit or explicit term or condition of employment; 2) Making decisions affecting someone’s employment or compensation on the basis of whether the person submits to or rejects sexual demands.
 - e) Unwelcome behavior – Conduct that the employee did not solicit or incite and that the employee regards as undesirable or offensive.

4. The agency expects that everyone will act responsibly to establish a pleasant and friendly work environment. However, if an employee feels he/she has been subjected to any form of harassment and/or discrimination, the employee should firmly and clearly tell the person engaging in the harassing and/or discriminating conduct that it is unwelcome, offensive, and should stop at once. The employee also should report any discrimination and/or harassment to his/her team manager, or the Coordinator of Human Resources. That person will take the necessary steps to initiate an investigation of the discrimination and/or harassment claim.
5. The agency will conduct its investigation in as confidential a manner as possible. A timely resolution of each complaint will be reached and communicated to the employee and the other parties involved. Appropriate corrective action, up to and including termination, will be taken promptly against any employee engaging in discrimination and/or harassment.
6. Retaliation against any employee for filing a complaint or participating in an investigation is strictly prohibited. However, any employee that knowingly makes a false claim of harassment and/or discrimination will be subject to corrective action, up to, and including, termination.
7. If an employee feels that his/her complaint has not been or cannot be properly handled by the team manager or the Coordinator of Human Resources, he/she may forward the complaint to the Executive Director.

VIOLENCE IN THE WORKPLACE

POLICY:

The safety and security of all employees is of primary importance at the agency. Threats, threatening and abusive behavior, or acts of violence against employees, people supported, visitors, or other individuals by anyone on agency property will not be tolerated. Violations of this policy will lead to corrective action up to, and including, termination and/or referral to appropriate law enforcement agencies for arrest and prosecution. The agency reserves the right to take any necessary legal action to protect its employees and people supported.

PRACTICE:

1. Any person who makes threats, exhibits threatening behavior, or engages in violent acts on agency premises shall be removed from the premises as quickly as safety permits and shall remain off agency premises pending the outcome of an investigation.
2. Following investigation, the organization will initiate an immediate and appropriate response. This response may include, but is not limited to, suspension and/or termination of any business relationship, reassignment of job duties, suspension or termination of employment, and/or criminal prosecution of the person or persons involved.
3. All employees are responsible for notifying management of any threats that they witness or receive or that they are told another person witnessed or received. Even without a specific threat, all employees should report any behavior they have witnessed that they regard potentially threatening or violent or which could endanger the health or safety of an employee when the behavior has been carried out on an agency-controlled site or is connected to agency employment or agency business.
4. Employees are responsible for making this report regardless of the relationship between the individual who initiated the threatening behavior and the person or persons being threatened. [Note: This includes one spouse or family member threatening and/or harming another.]
5. The agency understands the sensitivity of the information requested and shall follow confidentiality procedures that recognize and respect the privacy of the reporting employee.

CONFLICT OF INTEREST

POLICY:

The agency expects employees and volunteers to scrupulously avoid any conflict, direct or indirect, between their own respective individual, professional or business interests and the interests of the agency or its persons supported.

PRACTICE:

1. A conflict of interest exists if an employee or volunteer:
 - a) Seeks or obtains for benefit or advantage, except in conformity with agency policy, anything of more than nominal value that would not normally be available to the employee or volunteer.
 - b) Uses or makes available for benefit or advantage, except in conformity with the agency's policy, the property, records, services, name, emblem, or endorsement of the agency's affiliation of the employee or volunteer.
 - c) Publicly uses the employee's or volunteer's affiliation or that of any other agency's volunteer or employee in connection with personal association with partisan politics, denominationally religious matters or positions on issues that are not in conformity with the agency policy.
2. **Gifts, Gratuities.** No employee shall accept any gifts, gratuities, free trips, personal property or other items of more than nominal value from any person supported or vendor with whom the agency conducts business.
3. **Political Involvement.** While individual employees are encouraged to be politically involved as responsible citizens, the agency takes a non-partisan role relating to political issues and unequivocally forbids the use of its funds for the support of political parties or candidates. No employee is authorized to make or approve such a contribution on behalf of the organization.
4. **Personal Beliefs.** The agency recognizes that its employees may hold a wide range of personal beliefs, values and commitments. These beliefs, values and commitments are a conflict of interest only when they prevent employees from fulfilling their job responsibilities, if employees attempt to use the agency's time and facilities for furthering them, or if employees continue attempting to convince others of their personal beliefs after they have been asked to stop.

5. **Outside Employment.** Employees shall not engage in or accept outside employment or render services with a person, firm or corporation when such service or employment:
 - a) Is incompatible with the proper discharge of the duties and responsibilities of employment with this agency, or would impair independence of judgment or actions in such employment; or
 - b) Involves such hours or work or physical effort that it would or could reasonably be expected to reduce the employee's quality or quantity of service to this agency.
 - c) Any employee, who is engaged in or is planning to engage in outside employment, shall inform their team manager or director.
6. **Board Vending.** The agency shall purchase goods or services from a member of the Board of Directors or from a business owned by or controlled by a Board member only under the following conditions:
 - a) The costs of goods or services to be purchased are priced at or below market value;
 - b) The goods or services cannot be conveniently purchased from another equally qualified vendor; and
 - c) The purchase of goods or services is acknowledged in a meeting of the Board of Directors.
7. **Employee Vending.** No employee shall sell or lease any property, goods, or services to the agency or its clientele without the express written consent of the Executive Director. In those cases, where approval may be given, the following conditions shall apply:
 - a) The costs of goods or services to be purchased are priced at or below market value;
 - b) The goods or services cannot be conveniently purchased from another equally qualified vendor; and
 - c) The purchase of goods or services is acknowledged in a meeting of the Board of Directors.
8. **Residential Ownership.** No employee or Board member of the agency can own a home which a person supported rents or leases.

9. **Indirect Residential Ownership.** If any family member (defined as spouse, parent, grandparent, brother, sister, or child) of an employee or Board member has:
- a) An ownership interest in a residential facility that is not publicly held,
 - b) An ownership interest in a business which is not publicly held that owns or manages a residential facility,
 - c) An ownership interest or combined ownership interest of at least thirty-five (35) percent in a residential facility which is publicly held, or
 - d) An ownership interest or a combined ownership interest of at least thirty-five (35) percent in a business that is publicly held that owns or manages a residential facility;
- Then that individual (staff or Board member):
- a) Must notify the agency of such ownership interest,
 - b) May not serve in a capacity of decision-making or influence or responsibility for the direct referral or placement of person to any residential facility.
9. As employees and volunteers have questions about potential conflict of interest, they are responsible for taking initiative to explore the potential conflict to the point of clarity.
10. Under no circumstances shall an employee write or sign a check to him/herself. If expenses are incurred on behalf of the agency or an individual, the employee shall present the receipt(s) to another employee authorized to write checks.

CONFIDENTIALITY

POLICY:

The agency is committed to maintaining confidentiality in dealing with persons supported, employees and proprietary information.

PRACTICE:

1. Employees will, to the best of their ability, ensure confidentiality and privacy in regard to history, records and discussions about the persons supported. Disclosure can be made only under specified conditions described below, for reasons relating to law enforcement and fulfillment of the agency's mission. This means that an employee shall not disclose any personally identifiable information (including names, addresses, health issues, activities, behavior and conditions) gathered in the agency helping relationship about a person to anyone inside or outside of the agency who do not have a "need to know" unless authorized by the Executive Director or other authorized personnel. The principle of confidentiality must be maintained in all programs, teams, functions and activities. This obligation exists even after the employee has left the agency.
 - a) Protected Health Information (PHI), defined as individually identifiable health information that is transmitted or maintained in any form or medium (electronic, oral, or paper) by a covered entity or its business associates, shall be protected and maintained in a confidential manner.
 - b) Agency employees and volunteers will assure compliance with all applicable state and federal laws and regulations concerning confidentiality requirements (e.g., T.C.A, 33-3-103, Health Insurance Portability and Accountability Act, [HIPAA], and Health Information Technology for Economic and Clinical Health Act [HITECH]).
 - c) Information about persons supported will be released only with the written approval of the person and/or that individual's parent, guardian, or conservator, as appropriate.
 - d) If records (paper and electronic) are inspected by an outside agency (i.e., other than authorized funding and regulatory agencies), the individual(s) who inspect(s) the records must be specifically authorized to do so by the Executive Director.
 - e) An employee will safeguard all written and electronic personally identifiable information, assuring that such information is not accessible to unauthorized individuals.

- f) An employee will not discuss any individual or information contained in the individual's record with unauthorized individuals, whether on or off duty. All employees are required to sign a confidentiality acknowledgment stating their responsibility and commitment in regard to information on persons supported.
 - g) Care shall also be taken to ensure that unauthorized individuals do not overhear any discussion of confidential information and that documents containing confidential information are not left in the open or inadvertently shared.
2. Information concerning the agency's employees is considered personal and confidential and is not to be disclosed to outside parties, except through written consent of the employee or by legal attachment in response to subpoena. All requests for personal information should be referred to the Coordinator of Human Resources.
 3. Proprietary information is handled with care including such things as budget data, confidential correspondence, computer data, personnel records, person supported records and mailing lists. Questions concerning whether certain information is proprietary should be referred to the Executive Director.
 4. Unauthorized disclosure of confidential or privileged information is a serious violation of this policy and will subject the person(s) who make an unauthorized disclosure to appropriate corrective action including dismissal.

PROFESSIONAL ATTIRE

POLICY:

While it is the intent of the agency that all employees dress for their own comfort during work hours, the professional image of the organization is maintained, in part, by the image that our employees present to customers (people supported or their families), vendors, and others in the community.

PRACTICE:

1. Employees working in office areas should dress professionally. Blue jeans, T-shirts, and leggings are not appropriate office dress.
2. On approved casual days, employees may dress in casual clothing, including blue jeans, although dress standards still require a neat, clean appearance. Employees meeting with customers or the public should wear appropriate business attire.
3. Employees working in direct support or maintenance areas may wear blue jeans and T-shirts as well as shorts as appropriate.
4. Employees may not wear unusually revealing clothing (such as halter tops, strapless tops, spaghetti straps, tank tops, cropped tops, short shorts), tee shirts with offensive wording on them, clothing that shows undergarments (sheer), torn clothing, or clothing with holes in it. All clothing must be clean, neat, and fit properly.
5. For all employees in the public view, professional appearance also means that the organization expects the maintenance of good hygiene and grooming while working, including:
 - a) Rings or studs through the nose, eyebrow, tongue, or body parts (other than the ear lobe) visible to the public must be modest in size if worn while working.
 - b) All tattoos must be modest in size or covered at all times and may not be offensive in nature.
6. Employees working in direct support should have fingernails that are natural (not artificial), short or moderate in length (¼ inch maximum) and properly cleaned. Artificial nails harbor significantly more potential pathogens than natural nails.
7. Employees should wear appropriate, safe footwear for their job. Employees working in the office areas should dress professionally. For employees that provide direct support:
 - a) Appropriate foot wear includes:
 - Shoes that are firmly attached to the entire foot, either from being laced or strapped.
 - Shoes that have protection for the toes.
 - Shoes that have textured soles to prevent slipping.

b) Inappropriate foot wear includes:

- Shoes that are attached to the foot with one strap (e.g., flip flops).
- Fully open-toed shoes (e.g., flip flops, strapped sandals).
- Shoes with smooth or slick soles.
- Shoes with high heels.

8. Employees should refrain from wearing heavily scented fragrances or bringing heavily scented items to the work place during working hours, including perfumes, after shaves, body odors, tobacco odor, etc. (As a rule of thumb – if the odor can be detected at a distance of arm's length, it is too heavy).
9. Clothing, footwear, and any jewelry must not constitute a safety hazard for employees or persons supported. All employees should practice common sense rules of neatness, good taste, comfort, and moderation. The agency reserves the right to determine appropriate dress, grooming, adornment and fragrances at all times and in all circumstances. The agency may send employees home to change clothes or remove items should it be determined their dress or grooming is not appropriate. Employees will not be compensated for this time away from work; however, personal leave may be used.

SOLICITATION

POLICY:

In the interest of maintaining a proper business environment and preventing interference with work and inconvenience to others, employees may not distribute literature or printed materials of any kind, sell merchandise, solicit financial contributions, or solicit for any other cause during work time. The only exception to this is agency-sponsored solicitations.

PRACTICE:

1. Persons who are not employed by the agency are prohibited from soliciting funds or signatures, conducting membership drives, distributing literature or gifts, offering to sell merchandise or services, or engaging in any other solicitation or similar activities.
2. The agency authorizes a limited number of fund drives by charitable organizations. Employees may volunteer to assist these organizations by conducting their drives. Participation by employees is voluntary.
3. Persons who are employed by the agency are prohibited from soliciting funds, selling merchandise or services, or engaging in any other solicitation or similar activities within the agency which will provide personal gain for the employees or their families without the written consent of the Executive Director.
4. Persons who are employed by the agency and their families are prohibited from soliciting funds, selling merchandise or services, or engaging in any other similar activities with persons supported or their families at any time without the expressed written consent of the Executive Director.
5. The agency maintains bulletin boards to communicate agency information and to post notices required by law. These bulletin boards are for the posting of agency information and notices only.
6. The agency maintains electronic communication systems to more efficiently communicate and conduct its work. These systems are not to be used to sell any items or products (e.g., school magazine or food sales), solicit contributions (e.g., fund raising for individuals in need), or other “help” purposes (e.g., prayer requests) no matter how worthy the cause.

CONDUCTING PERSONAL BUSINESS

POLICY:

Employees of the agency are expected to refrain from conducting personal business during work hours. This includes the use of personally-owned and agency-owned communication devices and activities while at the work site(s).

PRACTICE:

I. USE OF TELEPHONES. Office telephones and telephones in service settings are a vital part of the agency's business operations.

1. Personal calls, local or long distance, should be made only when necessary and conversation should be kept brief.
2. Employees who make personal, long-distance calls must charge the call to a telephone credit card, the employee's home phone, or placed collect. If personal, long-distance calls are charged to an agency telephone or the telephone of a person supported, an additional collection fee will be charged to the employee and corrective action may be initiated.

II. USE OF CELLULAR TELEPHONES. Cellular telephones are issued to or contracted with certain employees in connection with their job duties. Other employees may use their personal cell phones for occasional business purposes as well.

1. Employees need to limit personal use of cellular telephones in the same way they need to limit personal use of office telephones. During work time, any personal calls or texts should be made or received only when necessary and conversation should be kept brief.
2. Employees shall not use their cell phones during working hours to engage social media such as Facebook, Twitter, etc. or to engage in phone games or applications.
3. The agency requires the safe use of cellular phones by employees while conducting business:
 - a) The employee should not use the cellular telephone for business or personal use (either for talking or texting) while driving because of safety concerns, but should instead pull to the side of the road to make or receive telephone calls or electronic texts.
 - b) If an employee is unable to pull over or stop before receiving a cellular telephone call, they should use the earphone/microphone for increased safety, keep the business conversation brief, and immediately locate a safe area to park their vehicle. In no case shall an employee text while driving.

III. USE OF OTHER AGENCY PROPERTY AND MATERIALS.

1. Employees may use agency resources for personal business only with the approval of the Executive Director or his designee. The agency shall be fully reimbursed for the use of any resources at an agreed upon rate.
2. The use of agency business stationery and/or the agency's postage meter for personal correspondence is strictly forbidden.
3. Agency equipment may be used for personal business only with the prior approval of the Executive Director. Employees shall assume full responsibility for the return and any necessary maintenance and repair of such equipment.
4. Employees who have outside business interests or employment shall not engage in such pursuits while at work in agency facilities or while on duty on agency business.

USE OF AGENCY VEHICLES

POLICY:

In providing and maintaining a fleet of vehicles, the agency must assure that all vehicles are used in a responsible manner to fulfill its service mission.

PRACTICE:

1. In order to operate any agency vehicle, the driver must possess a current Class D Operators License issued by the Tennessee Department of Public Safety. The driver's license number and expiration date should be on file.
2. It is the employee's responsibility to keep this information up-to-date, including reporting to the Executive Director any moving violations or changes in driving status within five (5) days of the violation or change.
3. Agency vehicles may be operated only by agency employees, by employees of approved collaborative agencies, or by individuals specifically approved by the Executive Director.
4. Agency vehicles may be utilized only for specifically authorized purposes, for the benefit of the persons supported of agency services, and for conducting the business and services of the agency. They shall not be used for the benefit or convenience of employees, individuals, or groups either affiliated or non-affiliated with the agency without the specific authorization of the Executive Director.
5. Agency vehicles shall only transport persons supported and employees as appropriate. Other persons, including family members or caretakers of persons supported, shall be transported only with the specific authorization of the Executive Director. No unauthorized persons shall be transported on or in agency vehicles.
6. The individual operating an agency vehicle is responsible for assuring that all passengers are secured by a seat belt or other proper restraining device(s).
7. The individual operating an agency vehicle is responsible for maintaining that vehicle in a clean and orderly condition, including - removing debris, closing windows and locking the vehicle at the conclusion of the trip.
8. The individual operating an agency vehicle is responsible for promptly reporting any maintenance needs or operating problems to the appropriate person(s).

9. The individual operating the vehicle is responsible for the completion and submittal of all required operating documentation, such as Van Mileage Log and gas tickets.
10. The individual operating the vehicle is responsible for ensuring that passengers behave in an orderly and responsible manner, exhibiting behaviors that do not negatively reflect on the agency or the individuals it serves.
11. If any agency vehicle is involved in an accident involving another vehicle or resulting in injury, law enforcement officers should be contacted immediately and a police report completed. All accidents, no matter how minor, should be reported to the Executive Director or his designee immediately.
12. Any individual driving an agency vehicle is responsible for obeying all applicable traffic laws and regulations. Failure to obey traffic laws will result in corrective action.
13. If any agency vehicle receives any moving traffic violation, the driver should submit a written report to the Executive Director within twenty-four (24) hours. All reports of traffic violations; e.g., exceeding the posted speed limit, shall be investigated. Any repeated offenses or any offense occurring when persons supported are on the vehicle shall result in immediate corrective action and possible termination.
14. Agency vehicles should not be utilized for trips further than one hundred (100) miles from the vehicle's home base without specific authorization from the program manager or Executive Director.
15. The use of tobacco products, alcohol or drugs in agency vehicles by drivers or passengers is strictly prohibited.

AGENCY PURCHASING

POLICY:

The agency shall require authorization and approval prior to purchase of any supplies, services, or equipment.

PRACTICE:

1. Supplies and Services:

- a) Each employee wishing to make a supply or service purchase with program funds should first submit a Purchase Request Form to the designated team manager or Executive Director.
- b) The designated team manager shall review the request. If the item is needed for legitimate team activities and within budgetary allowances, the form should be signed indicating approval. Items that are not approved shall be marked off the Purchase Request Form and initialed by the manager.
- c) All approved requests shall be forwarded to the administrative office to be processed.
- d) Regular, recurring purchases (gasoline, utilities, etc.) will not fall under these rules.

2. Equipment:

- a) Whenever equipment items (i.e., items with an acquisition cost of \$5,000 or more) are needed, the requesting employee shall submit a purchase request to the Executive Director with an explanation for the request. If the request is within budgetary allowances the Executive Director will present, the request to the Board of Directors at the next regularly scheduled monthly meeting for approval.
- b) Once approved, the employee may be required to request written bids from up to three vendors. These bids shall be retained on file in the administrative offices.
- c) When all bids are comparable, the best bid shall be accepted.

EMPLOYEE EXPECTATIONS IN THE COMMUNITY

POLICY:

Many people supported spend a significant portion of their day involved in activities in the community. While participating in the community most people have employees in attendance to support them in those activities. While being compensated to accompany individuals in the community, employees are expected to devote all of their time and attention to supporting the person(s). It is the policy of the agency that employees will dedicate their work time to supporting the individual(s) they are paid to support in activities addressed in the support plan or chosen by that individual and not to engage in personal activities.

PRACTICE:

1. **PERSONAL BUSINESS.** Employees shall not engage in personal business or activities during work hours supporting person(s). This shall include:
 - a) Making or receiving personal telephone calls during paid time with persons supported, except in emergency situations and when the person is receiving other support;
 - b) Running errands, including bill paying, banking, shopping, etc., except when the employee is engaged in the activity primarily to support the person(s);
 - c) Visiting or otherwise engaging with family or friends during working hours;
 - d) Sleeping during working hours, whether persons supported are awake or sleeping.
2. **HOME OF THE EMPLOYEE.** Person(s) supported shall not visit the home or business of an employee or employee's family or friends during the employee's working hours unless:
 - a) There is a recommendation from the person's circle of support that visits to the home should be a part of the person's plan,
 - b) That recommendation states clearly when, where, and under what conditions that visit should occur, as well as the purpose or expected outcome of the visit(s),
 - c) The Team Director is made aware of the visit and has given approval, and
 - d) The employee gives assurances that the person supported is in the home only for the benefit of the person and not for the convenience or personal business of the employee.

3. **OTHER ACTIVITIES.** The interests and desires of the person supported, as expressed in their Individual Support Plan, will direct the community activities in which the person is involved.
 - a) People shall be supported to participate in activities of their choice, including church or other places of worship, restaurants, etc. When the person has made a choice, an employee will support the person's participation unless there is an undue risk of harm to the person or employee.
 - b) When community activities involve relatives of employees, there must be assurance that the person supported desires to participate in the activity with those relatives and it is not just to accommodate the employee. These activities may include:
 - i) Sporting or cultural events involving practice or presentations by the children or grandchildren of employees;
 - ii) Family gatherings for holidays or special events;
 - iii) Participation in such events requires prior approval by the team manager.
4. **APPEARANCE.** While employees are involved with person(s) supported in community activities, their appearance reflects on the person(s) being supported and the agency.
 - a) Employee clothing should appear neat and clean, suitable for the work situation, for wearing in public, and not be torn, soiled, or unusually revealing.
 - b) Employees should be appropriately groomed for their work in the community. (See PROFESSIONAL ATTIRE 6-16)

VISITORS IN THE WORKPLACE

POLICY:

Many people supported enjoy having visitors in their lives; however, when an employee is responsible for supporting individuals as a major part of the job and is receiving pay to provide that support, the imposition of a child, family member, or friend into the work site may detract from the support being provided. It is the policy of the agency to allow visitors in the workplace only under the following conditions.

PRACTICE:

1. **CHILDREN.** No child (of any age) will be in any home of a person(s) supported, day support site, agency vehicle, or other location where agency services or supports are provided unless:
 - a) There is a recommendation from the person's circle of support that children should be involved in his/her life,
 - b) That recommendation states clearly when, where, and under what conditions children should be present,
 - c) There is responsible adult supervision for the children other than the paid support employees, and
 - d) The Team Director is made aware of the child being present and has given approval.
2. **OTHER FAMILY MEMBERS.** No family member of an employee will be in any home of a person(s) supported, day support site, agency vehicle, or other location where agency services or supports are provided for more than occasional, short duration unless:
 - a) There is a recommendation from the person's circle of support that the family member should be involved in his/her life,
 - b) That recommendation states clearly when, where, and under what conditions that family member should be present,
 - c) If the family member is living or sleeping in a residence, a criminal background check has been conducted, and
 - d) The Team Director is made aware of the family member being present and has given approval.

3. **OTHER VISITORS.** No friends or acquaintances of employees will be in any home of a person(s) supported, day support site, agency vehicle, or other location where agency services or supports are provided unless:
- a) There is a recommendation from the person's circle of support that the individual should be involved in his/her life,
 - b) That recommendation states clearly when, where, and under what conditions the individual should be present, and
 - c) The Team Director is made aware of the individual being present and has given approval.

AGENCY WORK RULES

POLICY:

Violation of any rule of the agency may result in corrective action, up to and including discharge. The list of rules below does not contain every rule or possible standard of conduct expected from our employees, but it states many of the more fundamental rules. If you are unsure about what is expected of you in a certain circumstance, please ask your manager.

The agency's interpretation and judgment of whether or not a rule has been violated is final and binding on both employees and the agency.

PRACTICE:

Prohibited conduct includes:

1. Violating safety rules or safety practices.
2. Violating substance abuse policy.
3. Engaging in horseplay, scuffling or throwing things.
4. Failing to immediately and accurately report an injury.
5. Failing to immediately report suspected incidents of abuse, neglect, or mistreatment.
6. Being tardy or absent without authorization or notification.
7. Missing three consecutive scheduled workdays without notifying the agency.
8. Contributing to unsanitary conditions or poor housekeeping.
9. Smoking on duty.
10. Causing loss or waste of material or parts due to carelessness.
11. Unauthorized use of agency phones.
12. Unauthorized use of phones or other possessions of persons supported.
13. Posting, altering or removing any matter on bulletin boards on agency property unless specifically authorized.
14. Being dishonest or committing a fraudulent act or breach of trust.
15. Recklessly driving, exceeding safe speeds, or texting while driving on agency business.
16. Threatening, intimidating, coercing or interfering with fellow employees on agency property or on agency business.
17. Harassment of another employee
18. Breach of confidentiality
19. Using profane, abusive or threatening language.
20. Leaving the work site during the work shift without permission.
21. Working overtime without authorization or failure to work assigned overtime.

22. Failing to follow job instructions, verbal or written, insubordination.
23. Stealing, misusing, destroying or removing from agency premises without authorization any agency property or the property of any employee.
24. Using agency's facilities, equipment time or materials without authorization.
25. Restricting production or causing, creating or participating in a disruption of any kind during work time or on agency property.
26. Provoking or instigating a fight or fighting during work hours, on agency property or on agency business.
27. Engaging in criminal conduct whether or not it is related to job performance.
28. Sleeping on the job during work hours.
29. Leaving a person supported unattended.
30. Violation of the rights of a person supported, including Title VI violations.
31. Falsifying any agency records, including employment information.
32. Recording the work time of another employee, allowing any other employee to record your work time or allowing falsification of any time card, whether your own or another employee's.
33. Engaging in any other conduct or omission that the agency, in its sole discretion, believes to be adverse to the best interest of the agency.
34. Carrying firearms or any other dangerous weapons at any time on agency property.
35. Conducting personal business while on duty.
36. Having unauthorized visitors in the workplace.
37. Violating any agency rule, policy or procedure.

ELECTRONIC RECORDS AND SIGNATURES

POLICY:

The agency utilizes electronic forms of communication, data collection, record management and documentation. This policy is intended to safeguard and properly manage all records, especially including protected health information (PHI), created, received, maintained, used, or stored on electronic media. In relation to electronic health records (EHR) the agency will comply with CMS Electronic Signature Guidance, Health Insurance Portability & Accountability Act of 1996 (HIPAA), Health Information Technology for Economic and Clinical Health Act (HITECH), The American Recovery and Reinvestment Act of 2009, and the Tennessee Department of Intellectual and Developmental Disabilities (DIDD) Electronic Records and Signature Policy.

PRACTICE:

SAFEGUARDS

1. System administrators will be established to be responsible for proper assignment of access privileges to users, setting up password policies and activating/deactivating user accounts. They will have a clear understanding and sound knowledge about the various application capabilities and the underlying HIPAA and HITECH regulations and E-sign policy. These include:
 - a) **Access Control:** Administrators shall assign proper roles and privileges to users to grant them access to the system while at the same time restricting that access only to the information they are authorized to see. Administrators are also responsible for updating these access privileges assigned to users in accordance with their changing job responsibility and authority.
 - b) **Implement Password Practice:** Administrators will set up and implement a password practice for the agency by specifying a number of properties including the minimum length, number of letters, digits, and special characters required and the practice regarding the expiration period of passwords. The agency will not record, inquire of any employee or assign passwords to employees. Administrators will set a temporary password for a new employee and may reset a temporary password at the request of an employee who has been locked out of the system. The employee will be prompted and requested to replace the temporary password with a new, unique password.
 - c) **Managing User Accounts:** Administrators will create and activate PHS and other electronic accounts for employees and provide them with the login information they need to access these accounts. Administrators may also disable an employee's user account when they are leaving the agency, on extended leave, or administrative leave.

- d) **Assignment of Roles and Caseloads:** Administrators will assign each user a specific list of roles for access privileges and/or access to a specific caseload(s) of individuals based upon their need to know, access and level of responsibility for those individuals.
 - e) **User Authentication:** All users, including administrators, must authenticate with a unique login name and secret password to gain access to the system.
 - f) **Privacy Officer.** A Privacy Officer will be responsible for development and implementation of HIPAA-compliant practices and for responding to all HIPAA related complaints.
 - g) **Tracking User Activities:** Administrators can track all users' activities in the PHS system. The tracking system can record and report on activities of all user accounts within the agency. The system shall record all users accessing the system, time, date, login name, user name, all activity, including viewing of information, creation or modification of any records.
 - h) **Staff Training:** Administrators shall assure that all new employees are appropriately trained in the use of the electronic records systems with which they will be working.
 - i) **Record Access:** Information contained in the electronic records systems is printable and can be reproduced upon request for any appropriately credentialed monitor, surveyor, or auditor.
 - j) **Readily Accessible:** Information contained in the electronic records systems is accessible to any authorized person, including monitors, surveyors, or auditors, twenty-four hours per day. The administrator can provide immediate and complete access to the electronic records to an authorized person through online access and remote approval.
 - k) **Deletion of Information:** The electronic records systems shall maintain all data submitted by users in the original form, and as approved, updated or modified, all versions of reports, data and information shall be archived and retrievable. Records and data shall not be deleted from the system.
2. Additional safeguards will be utilized to prevent unwarranted access to agency data and information:
- a) Employees should utilize agency-owned software that is properly registered. No additional software should be installed on any agency electronic device without the consent of the administrator.

- b) No protected health information (PHI) or other personally identifying information shall be stored on jump drives, other storage sites or electronic media that are not password protected.
- c) Agency staff shall not share or divulge their assigned password nor attempt to gain access to any computer service or information for which they have not been granted access.
- d) When leaving employment at the agency, employees should leave all files on the computer. Copying or erasing files without permission by the administrator is prohibited. Violations may result in criminal prosecution.

ELECTRONIC SIGNATURES

1. Electronic signature means an electronic sound, symbol, or process attached to or logically associated with a record and executed or adopted by a person with the intent to sign the record.
2. The agency recognizes an electronic signature as a legitimate method for authentication of an entry in the record, so long as it comports with definitions and standards set forth in federal and state law and regulation and this policy. Acceptable use of an electronic signature must:
 - a) Be unique to the user, under his or her sole control, and verify the identity of the signer or authenticate the user to a person receiving or reviewing the signed record. A simple typed signature, symbol or mark does not satisfy this requirement if persons other than the signer could also have typed such signature, or provided such symbol or mark.
 - b) Ensure that what was signed cannot be altered. The agency electronic records system will detect changes to the electronic record made after it was electronically signed. Any change to the document once it has been signed invalidates the signature.
 - c) Provide non-repudiation, meaning that the electronic records system shall not permit the signer to successfully deny that he or she willingly and intentionally signed the document, or is not responsible for information contained in the signed record. This will be accomplished through use of an acknowledgement that the user must click in order to sign the record.
3. Although signed electronic records cannot be altered, the following shall be allowed:
 - a) **Addendum:** new documentation added to original entry. An addendum should be timely and bear the current date and reason for the additional information being added to the record. It must be authenticated by the signature of the person making the addition.

- b) **Amendment:** documentation meant to clarify health information with a health record. An amendment is made after the original documentation has been completed by the user. All amendments should be timely and bear the current date and signature.
- c) **Late entry:** delayed electronic health record documentation. The entry pertains to the regular course of business for the service recipient it addresses but is recorded subsequent to the usual and customary point-of-care documentation timeliness. All entries should bear the current date and signature.

ELECTRONIC COMMUNICATIONS

1. The use of automation systems, including computers, fax machines and all forms of Internet/Intranet access, is for agency business and is to be used for authorized purposes only. Brief and occasional personal use of the electronic mail system or the Internet is acceptable as long as it is not excessive or inappropriate, occurs during personal time, and does not result in expense to the agency.
2. Use is defined as “excessive” if it interferes with normal job functions, responsiveness, or the ability to perform daily job activities. Agency automation systems are agency resources and are provided as business communications tools. Electronic communication should not be used to solicit or sell products, distract coworkers, or disrupt the workplace.
3. Use of agency computers, networks, and Internet access is a privilege granted by management and may be revoked at any time for inappropriate conduct including, but not limited to:
 - Sending chain letters
 - Engaging in excessive private or personal business activities;
 - Misrepresenting oneself or the agency;
 - Engaging in unlawful or malicious activities;
 - Using abusive, profane, threatening, racist, sexist, or otherwise objectionable language in either public or private messages;
 - Sending or receiving pornographic materials;
 - Becoming involved in partisan politics;
 - Causing congestion, disruption, disablement, alteration, or impairment of agency networks or systems;
 - Infringing in any way on the copyrights or trademark rights of others;
 - Using recreational games; and/or
 - Defeating or attempting to defeat security restrictions on agency systems and applications.

4. Using agency automation systems to create, view, transmit, or receive racist, sexist, threatening, or otherwise objectionable or illegal material is strictly prohibited. “Material” is defined as any visual, textual, or auditory entity. Such material violates the agency anti-harassment policies and is subject to corrective action. The agency electronic systems must not be used to violate the laws and regulations of the United States or any state, city, province, or other local jurisdiction in any way. Use of agency resources for illegal activity can lead to corrective action, up to and including dismissal and criminal prosecution.
5. Each employee should understand that all electronic communication systems used while at work, including but not limited to the Internet, telephones systems, and e-mail, as well as all information transmitted, received or stored in these systems are the property of the agency. Thus, the agency needs to be able to access and/or disclose any information in the electronic communication system, even those protected by your personal password, at any time, with or without notice to the employee. Employees have no expectation of privacy in connection with the use of these systems or the transmission, receipt or storage of information in such systems. Therefore, employees should not use these electronic communication systems to store or transmit any information that they do not want management and/or other employees to see, hear or read.
6. Because of limitations in server storage capacity, electronic communications (e-mail) should not be stored indefinitely. If messages are significant and of business value, they may be maintained, preferably in appropriately labeled subfolders. Otherwise, obsolete messages should be periodically deleted from the system.

FALSE CLAIMS ACT AND WHISTLEBLOWER PROTECTION

POLICY:

It is the policy of the agency to require all staff members to report all known or suspected violations of the Federal False Claims Act (FFCA) or the Tennessee Medicaid False Claims Act (TMFCA) as described below. A person violates the False Claims Act by knowingly submitting, or causing another to submit, false claims for payment of government funds. It is also the policy of the agency that persons reporting such suspected violations (sometimes referred to as “whistleblowers”) will not be retaliated against for making such reports in good faith.

PRACTICE:

I. DEFINITION

1. FFCA (located at 31 U.S.C. §3729) and as clarified by Section 4 of the Fraud Enforcement and Recovery Act (FERA) of 2009, states, in part, that it is a violation of Federal law for any person to knowingly present, or cause to be presented, to the Federal Government a false or fraudulent claim for payment or approval or who knowingly makes or causes to be made a false record in order to get a false claim paid by the Federal Government. A violation of the FFCA can result in a civil penalty, plus 3 times the amount of damages sustained by the Federal Government, and the cost of the civil suit.
2. TMFCA (T.C.A. §71-5-182) allows, in part, civil and/or administrative actions to be brought against *any person who knowingly presents or causes to be presented a false or fraudulent claim for payment or approval under the Medicaid program or knowingly makes, uses, or causes to be made or used, a false record or statement material to a false or fraudulent claim under the Medicaid program* or who conspires to commit such violations. A violation of TMFCA can result in a civil penalty of not less than \$5,000 and not more than \$25,000 for each false claim, plus 3 times the amount of damages sustained by the State.

Note: In the context of this policy, the term “knowingly” means that a person, with respect to information-

- (1) Has actual knowledge of the information;
- (2) Acts in deliberate ignorance of the truth or falsity of the information; or
- (3) Acts in reckless disregard for the truth or falsity of the information.

For purposes of this definition, no proof of specific intent to defraud is required.

II. REPORTING A KNOWN OR SUSPECTED VIOLATION OF FFCA OR TMFCA

1. A staff member is expected to report any known or suspected violation of either the FFCA or the TMFCA to the staff member’s supervisor, the Agency Investigator, or the Executive Director (615-446-3111). In making reports to either the Agency Investigator or the

Executive Director, the staff member may make a report anonymously.

2. A staff member may also report known or suspected violations of the FFCA to the following Federal hotline, 1-800-424-5197 or by email at HHSTips@OIG.HHS.gov.
3. All persons making reports of compliance concerns are assured that such reports will be considered confidential to the extent permitted by law. Such reports will be shared with others only on a bona fide need-to-know basis.

III. WHISTLEBLOWER PROTECTION

1. The agency, along with state and federal law, prohibits retaliation. The agency will take no adverse action against persons for making such reports in good faith (“whistleblowers”), even if the report turns out not to be correct.
2. Retaliation and adverse action include the following: discharge, demotion, suspension, harassment, denial of promotion, transfer or in any other manner discrimination or threatening to discriminate against a staff member in the terms and conditions of the staff member’s employment.
3. Any staff member who believes that he or she has been subjected to or affected by a retaliatory conduct for reporting a suspected violation of a FFCA or FMFCA or for refusing to engage in activity that would be a violation of FFCA or FMFCA should report such retaliation to the Coordinator of Human Resources or Executive Director.

IV. DETECTING AND PREVENTING FRAUD, WASTE, AND ABUSE

1. The agency shall immediately investigate any reports of fraud, waste, and abuse received through agency staff, contractors, or the public.
2. The agency shall annually conduct an agency self-assessment, including:
 - a) Review relevant survey data from governmental agencies providing fiscal and programmatic oversight;
 - b) Review relevant findings of annual independent audit;
 - c) Review billing practices, to assure that:
 - (1) The agency is not billing for unnecessary services;
 - (2) Costs are not claimed unless based on appropriate and accurate documentation;
 - (3) Unallowable costs are not claimed for reimbursement.
 - d) Revisions will be made as necessary as a result of the assessments.
3. The agency will educate employees on the significance of these policies and the need to strictly adhere to them.