



Jewish Association Serving the Aging (JASA) and Affiliates* Code of Ethical and Legal Behavior

POLICY

Jewish Association Serving the Aging subscribes to the following code of conduct which is expected to be adhered to by all staff, interns, appointees and volunteers of the agency.

PURPOSE

JASA and JASA affiliates Code of Ethical and Legal Behavior (Code of Conduct) guides us in all that we do. It does not replace any of the more specific policies, procedures, or practices of the agency. Rather, it is intended to support our mission to provide the highest quality services to all we serve and to promote a culture of honesty and integrity.

Maintaining integrity and high ethical and legal standards requires hard work, courage, and difficult choices. Each employee must accept responsibility for compliance with this code. Commitment to these standards should never be compromised for personal, financial, professional, or other business purposes.

Each and every workforce member is expected to carry out their daily tasks in a legal and ethical manner that can withstand the scrutiny of others, including outside regulatory agencies. All workforce members are expected to abide by the rules, regulations, and policies that govern their job. There are core standards and values that must be upheld for every workforce member in all interactions with the individuals we serve, vendors, funders and colleagues. In addition, there are job-based functions that require strict adherence to specific laws, rules, and regulations based on the task performed.

Please note that in addition to carrying out their work duties in a compliant and ethical manner, workforce members are also expected to bring forth any suspected compliance issues to their supervisor or to the JASA compliance officer or utilize the anonymous complaint mechanism.

Compliance with the Code

All JASA and JASA affiliates workforce members are expected to comply with this code. The following standards provide definitive expectations and examples of unacceptable behavior, along with specific examples as an amendment to this code.

Standards

1. Disclose Potential Conflicts of Interest – Conflict of interest occurs in situations where a person has the potential to direct or influence a decision to his/her own gain.

Examples of Code Breach:

- Accept a gift(s) of significant value that could influence work-related decision making, including preferential treatment toward a client or vendor.
- Use business information resources for personal gain or profit.
- Engage in business transactions, outside of JASA and JASA affiliates services, with the clients we serve.
- Solicit donations/ sell products for outside organizations on JASA and JASA affiliates premises or during business hours.

Example of Expected Conduct:

- An employee who receives a gift of significant value (>\$25) from a vendor or contractor should share the gift with the entire department, if possible, or notify their supervisor or compliance officer in the event that it is not possible to share the gift.
- In general staff should not accept gifts of any value from the individuals we serve, but there are specific departmental policies that address this issue in greater detail. The policies can be found on the Google drive or you may speak with your supervisor or the compliance officer if you are unclear about the details in your departmental policy.

2. Adhere to all Agency Policies and Procedures – Agency policies and procedures were developed to ensure quality, fairness and safety for all workforce members.

Examples of Code Breach:

- Create a harassing work environment.
- Fail to comply with Equal Employment Opportunity Commission (EEOC) rules and regulations.
- Improperly record timesheet or knowingly approve a timesheet that was falsified.
- Fail to follow agency or departmental policies when carrying out your job duties.

Example of Expected Conduct:

- Workforce members should familiarize themselves with all agency and departmental policies. Any questions should be directed to their supervisor, a member of the HR team or the compliance officer.

3. Maintain Accurate Documentation, Billing, Coding, and Reporting Procedures and Practices, both operational and financial – Data integrity and accuracy, as well as retention, are critical for support of the individuals we serve and regulatory compliance. JASA and JASA affiliates will only bill for services and accept revenues for which it is entitled.

Examples of Code Breach:

- Bill for services an individual did not receive.
- Bill and receive funds for a service that is more expensive than that which was provided.
- Falsify records/attendance sheets including signatures and dates.

- Postdate a document or modify the date on a document.
- Document information in a client's chart that is inaccurate.
- Dispose of records prior to the end of the retention period.

Example of Expected Conduct:

- Staff should always document information that they know or believe is accurate and date the documentation with the date that the documentation was created/ completed.
- If staff is ever asked to falsify dates or falsify records in any way, they are expected to bring this matter to the attention of their supervisor, a member of the HR team or the compliance officer. Staff will never be prevented from making a good faith report of suspected fraud, waste or abuse and will not be retaliated against for reporting such conduct.

4. Understand and Adhere to the Client's Bill of Rights – The Client's Bill of Rights sets forth the minimum guidelines for ensuring that no individual shall be deprived of any civil or legal right that they are entitled to.

Examples of Code Breach:

- Provide differential care due to race, religion, national origin, sexual orientation, etc.
- Disclose information contained in the individual's records without proper authorization.
- Deny a client the right to see their treatment records.
- Prevent a client from voicing a complaint about services.

Example of Expected Conduct:

- Staff should familiarize themselves with the Client Bill of Rights for the specific program or service they provide and should seek guidance if they are uncertain about how to make sure that clients' rights are upheld in the provision of services.

5. Uphold an Atmosphere and Culture of Respect – Respectful interactions are expected at all times with the individuals we serve, our colleagues and those we do business with in our day-to-day duties at JASA.

Examples of Code Breach:

- Raising one's voice (yelling, shouting) or using inappropriate language towards another person.
- Gossiping about clients, colleagues, vendors or funders.
- Displaying items in your office/ workspace or sending emails that could be offensive to the individuals we serve, your colleagues, vendors or funders.
- Engaging in behavior that could be perceived as threatening, intimidating, harassing or dismissive.

Examples of Expected Conduct:

- Work in a way that is culturally sensitive and fosters an inclusive and welcoming

environment.

- Use positive, open or neutral body language (no eye rolling or using aggressive posture).
- Respond to all meeting invitations, emails and phone messages in a timely manner.
- Take steps to voice disagreements or resolve issues directly with your colleagues and those you interact with.

6. Represent JASA and JASA Affiliated Companies in a Fair and Honest Manner in All Interactions, Including Marketing.

Examples of Code Breach:

- Offer illegal inducements for referrals to JASA and JASA affiliates.
- Misrepresent JASA and JASA affiliates services and functions – Truth in Advertising.
- Alter JASA and JASA affiliates documentation.

Example of Expected Conduct:

- Staff should always represent the services offered by JASA in an honest and truthful manner.

7. Safeguard the Assets of JASA and JASA Affiliated Companies – JASA and JASA affiliates resources are to be used for job-related purposes and not for personal gain.

Examples of Code Breach:

- Use of JASA and JASA affiliates equipment/supplies for personal gain or purposes.
- Falsification of timesheets or approval of a timesheet that has been falsified.
- Theft of JASA and JASA affiliates equipment/supplies.

Example of Expected Conduct:

- Staff will use JASA supplies and equipment for job related functions. Staff will speak with their supervisor if a need arises for incidental use of JASA supplies or equipment for personal use.

8. Work in a Manner That Supports the JASA and JASA Affiliates Mission and Vision Statements.

Examples of Breach of Code:

- Fail to assume responsibility for your actions.
- Fail to seek advice and guidance on ethical issues from others as needed.
- Fail to assume accountability for decisions.
- Falsely place blame on others.
- Act irresponsibly or not in accord with mission and values.

Example of Expected Conduct:

- Staff will familiarize themselves with JASA’s mission.
- Staff will seek advice and guidance regarding difficult or challenging job tasks.
- Staff will act responsibly in their role at JASA and assume accountability for actions and decisions.

9. Comply with All Applicable Laws, Regulations, Codes, And Policies– Including Federal, State And Local Laws.

Examples of Breach of Code:

- Commit an unlawful act on facility premises or during work hours.
- Report to work under the influence of alcohol or drugs or use drugs or alcohol during work time.
- Fail to renew or maintain good standing with professional licensure or certification.
- Fail to report instances of fraud, waste or abuse of government funds.
- Fail to report suspected breaches of JASA data or suspected breaches of client information.

Examples of Expected Conduct:

- Staff will familiarize themselves with JASA policies as well as federal, state and local laws that govern their job duties.
- Staff will report suspected misconduct or suspected illegal actions, including instances of fraud, waste or abuse, that they believe have occurred at JASA or during the provision of services by JASA.

10. Be Good Stewards of the Community Trust – As a community multi-service agency, the resources entrusted to us are to be used for the benefit of the community and fiduciary decisions are to be made in the best interest of the community.

Examples of Breach of Code:

- Wastefulness of JASA resources.
- Inappropriate risk taking in financial investments.
- Failure to consider community need when planning new programs.

Examples of Expected Conduct:

- Staff will act in and make decisions in the best interest of JASA and in the best interest of the individuals and communities that we serve.
- Staff will use a variety of available resources when making fiduciary or programmatic decisions that affect JASA.

11. Protect Confidentiality of the Individuals We Support, the Staff Who Serve Them, and Agency-Sensitive Information – All JASA and JASA affiliates workforce members are responsible to safeguard and respect the confidentiality and privacy of the individuals we support in accordance with the rules and regulations of HIPAA and other federal and state statutes.

Examples of Breach of Code:

- Breach of confidentiality during an investigation.
- Inappropriate release of information regarding an individual we serve.
- Release names of clients outside of the workplace.
- Discussions about or conduct directed toward colleagues that is harassing or discriminatory in nature.
- Disclosing intellectual property or proprietary information without proper approval.

Examples of Expected Conduct:

- Staff will protect the privacy of those we serve and ensure that the appropriate authorization or consent is in place when disclosing information about a client we serve. If you have questions about when to disclose information speak with your supervisor or the compliance officer.
- Staff will treat their colleagues and the individuals we serve with respect at all times. Any questions or concerns should be brought to your supervisor, the HR department or the compliance officer.

12. Uphold the Code of Ethics Relative to Human Service Professionals – Many positions such as Nurses, Doctors, Lawyers and Social Workers have their own Code of Ethics or Code of Conduct related to that particular profession. Awareness, familiarity, and use of codes are expected in employment at JASA and JASA affiliates programs.

For more information, any questions, comments or concerns regarding this Code may be brought to your supervisor/manager or the compliance officer Carly Borenkind, LCSW (212) 273-5296, cborenkind@jasa.org or complianceconcerns@jasa.org.

If you wish to remain anonymous when reporting a compliance issue or concern contact:

JASA Anonymous Compliance Hotline: 212-273-5288 or submit a webform at https://docs.google.com/forms/d/e/1FAIpQLSe5WHmqB4YvdeGixQTZtUIWfBOwKnk4oOTmG-Dnvd-Io_cGcA/viewform

*Affiliated companies include Association for Services for the Aged, JASA Corporation, JASA Housing Management Services for the Aged, Brighton Beach Housing Development Fund Company, Inc., Brookdale Village Housing Corporation, Coney Island Site Nine Houses, Inc., Cooper Square Housing Development Fund Company, Inc., Israel Senior Citizens Housing Development Fund Corporation, Manhattan Beach Housing Development Fund Corporation, Positively Third Street Housing Development Fund Development, Seagirt Housing Development Fund Corporation, and Services for the Aged.