

5  
Transportation  
Use of a cellular phone or other electronic communications device, including the use of a hands-free device, while driving participants is strictly prohibited.

10 Texting or receiving texts while driving is strictly prohibited.  
Enforcement Standards  
Violations of this policy will be considered as severe misconduct and will result in disciplinary action up to and including termination.

15 **CODE OF ETHICS AND CONFLICT OF INTEREST**

**Policy Statement**

It is every employee’s responsibility to perform their duties in a manner that promotes and preserves public trust, proper stewardship, and confidence in the integrity of UCP. Employees must respect and comply with UCP policies, rules and regulations, observe high standards of conduct, and participate in establishing and maintaining such high standards. Adverse consequences, up to and including employee termination, can result from failure to comply with the Code of Ethics and Conflict of Interest policy.

25 All employees are expected to do their best to advance UCP’s mission and avoid situations that could create conflicts of interest. A conflict of interest occurs when your personal interests conflict or even appear to conflict with your ability to make sound, objective decisions on behalf of UCP.

**Purpose**

30 The Code of Ethics and Conflict of Interest policy was developed to define a set of ethical principles to be used to guide decision-making and actions for UCP employees, consultants, and business associates. The policy establishes a framework for professional behavior and responsibilities when professional obligations conflict or ethical uncertainties arise, and it also provides principles that participants and the general public can use to hold UCP accountable.

35 No single code can cover all possible scenarios and does not take the place of personal character, integrity and the use of sound judgment. Employees of UCP, volunteers, contractors, and members of the Board of Directors are expected to be knowledgeable of and adhere to the spirit of this policy as well as the specific standards and guidelines outlined in this policy.

40 **Procedures**

Business Ethics and Conduct

45 The successful business operation and reputation of UCP is built upon the principles of fair dealing and the ethical conduct of our employees. Our reputation for integrity and excellence requires careful observance of the spirit and the letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity.

50 The continued success of UCP is dependent upon our participants’ trust and we are dedicated to preserving that trust. Employees are obligated to UCP and its participants to act in a way that will merit the continued trust and confidence of the public.

UCP will comply with all applicable laws and regulations, and expects its Directors, Officers, and employees to conduct business in accordance with the letter, spirit and intent of all relevant laws and to refrain from any illegal, dishonest, or unethical conduct.

5  
In general, the use of good judgment, based on high ethical principles, will guide the employee with respect to lines of acceptable conduct. If a situation arises where it is difficult to determine the proper course of action, the matter should be discussed openly with your immediate Supervisor for advice and consultation. Suspicious of fraud, waste, or abuse in the operations at UCP Central PA, should be reported to the  
10 Manager, Quality and Compliance.

15  
Compliance with this policy is the responsibility of every UCP employee. Employees are required to report, under penalty of a criminal statute, violations of this policy occurring on or off the premises, or while conducting business. Disregarding or failing to comply with this standard can lead to disciplinary action, up to and including termination.

General Ethical Practice and Standards Guidelines

UCP expects its employees to adhere to the highest principles of honesty and integrity. Employees shall:

- Adhere to the ethical business principles and practices.
- Practice professional behaviors that demonstrate honesty, integrity and accountability.
- Maintain a level of competency as outlined in the Standards of Practice applicable to your specific profession/practice area.
- Seek the trust and confidence of all participants.
- Respect all laws and avoid involvement in any false, fraudulent or deceptive activity.
- Promote the right of privacy for all participants and protect the maintenance of confidential information to the fullest extent permitted by law.
- Avoid conflict of interest situations.

Conflicts of Interest

30  
Conflicts of interest may arise if you:

- Have a significant financial or other interest in one of UCP’s vendors;
- Have a family member or friend who is a partner, controlling shareholder, executive, director, or other decision maker of an entity that works with UCP;
- Hire, supervise, determine, or influence pay raises for a family member, spouse, or cohabitant;
- Hire a vendor or supplier managed by a family member, relative, or close friend;
- Receive compensation for services with respect to individual transactions involving UCP;
- Use UCP time, personnel, equipment, or supplies for any purpose other than UCP-approved activities, programs, or purposes.

40  
Employees must disclose to their Managing Employer and Instructor any relationship or activity that might impair, or even appear to impair, their ability to make objective and fair decisions when performing their jobs. Employees with a conflict-of-interest question should seek advice from their Managing Employer and Supervisor or Human Resources Department.

Gifts, Gratuities, and Honoraria

45  
The following operational standards are designed to ensure that UCP and/or staff members serving participants, or making decisions regarding purchases/services from contractors, are not unjustly enriched as a result of self-serving or abusive financial arrangements. Where specific contract stipulations conflict with any of the following, the contract stipulations take precedence\*. UCP’s operational standards include:

- Gifts from participants or contractors to staff members are neither expected nor encouraged.
- Employees shall not solicit or accept for their personal, professional or business gain gifts, gratuities, honoraria, entertainment, favors or other goods or services from current or prospective vendors, providers of services, or persons with a direct, material financial interest in the outcome of UCP programs, policies or positions.

## AGENCY WITH CHOICE – A UNITED CEREBRAL PALSY OF CENTRAL PA, Inc. (UCP) EMPLOYEE HANDBOOK

- 5 • Staff members may only accept gifts from participants or contractors of minimal value (less than or equal to \$25).
- Nominal gifts such as pens; paperweights; t-shirts; coffee mugs; soft drinks; flowers; chocolates or other small tokens may be accepted. No personal gift of cash or a cash equivalent (i.e. gift cards, gift checks, vouchers, phone cards, checks or money orders, etc.); special discounts; tickets for 10 entertainment where the host will not be present; gifts that would embarrass UCP; or situations where UCP's commitment to diversity and respect for others could be violated or could cause unease, shall never be accepted from a vendor.
- Staff members are not permitted to borrow money from participants.
- Staff members may not solicit participants for the purchase of merchandise or fundraising; nor may 15 staff solicit participants' families on behalf of non-UCP related purchases or fundraising.
- Staff members are not permitted to solicit gifts, favors, money, or other items of value from a program participant or contractor.
- Staff members are not permitted to make their services contingent on gifts(s) or being named 20 beneficiary of a life insurance policy or a will, nor may they exert undue influence or coercion concerning gifts, life insurance, or a will of a participant.
- If evidence of coercion is presented by a court or if beneficiary status is contested, UCP may investigate, and, if justified, terminate the employee.
- Staff members are not permitted to make their decisions regarding contractor purchases or services contingent on gifts, favors, money, or other items of value from contractors.
- 25 • Staff members are not permitted to participate in making financial decisions about a program participant's personal funds.

\*Employees with questions about these standards should seek advice from their Supervisor or Human Resources Department.

### 30 Adhering to Laws and Regulations

Employees of UCP are required to obtain criminal background checks and clearances as a condition of employment. Falsification on any background check or clearance application and/or an UCP employment application are considered violations of law and regulations. Fraudulent time keeping practices (including 35 making unauthorized altercations on a time and attendance record) are also considered violations of law and regulations.

### Billing

UCP practices sound fiscal and business practices to ensure the accuracy and integrity of the data collected for billing and other operational needs. Instructors are required to verify that participants are authorized to 40 receive services, that the services rendered are accurate and valid, and that appropriate documentation substantiating the services rendered has occurred within the required timeframes. UCP utilizes internal auditing and monitoring practices and detailed internal Financial policies and procedures to establish valid and accurate claims are submitted for payment.

### 45 Fraud and Abuse

Examples of fraud and abuse include, but are not limited to, the following: falsifying or altering claims or records, up coding or incorrect coding, double billing, billing for services that were not rendered or 50 authorized, failing to maintain appropriate documentation/records of services, any issues or actions resulting in overpayment, embezzlement, theft, failure to return funds not authorized, falsifying time sheets and or any other actions that cause the submission of a false claim (the submission of a claim for payment which the provider is not otherwise entitled to receive).

## AGENCY WITH CHOICE – A UNITED CEREBRAL PALSY OF CENTRAL PA, Inc. (UCP) EMPLOYEE HANDBOOK

5 It is the responsibility of all board members, officers, employees, and volunteers to report concerns about violations of UCP's code of ethics or suspected violations of law or regulations that govern UCP's operations.

10 UCP has an open-door policy and suggests that employees share their questions, concerns, suggestions, or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with any member of the Leadership Team. Employees with complaints or concerns about suspected ethical and legal violations may also submit their concerns as follows:

15 Suspicions of fraud, waste, or abuse in the operations at UCP, should be reported to the Manager, Quality and Compliance by calling the UCP Compliance Hotline at 877-410-9091, by email at Compliance@ucpcentralpa.org, or by submitting a compliance concern at www.ucplistsens.com. The Manager, Quality & Compliance is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Manager, Quality & Compliance will advise the President/CEO and/or the Board of Directors of all complaints and their resolution.

25 UCP maintains Non-Retaliation and Protection from Retaliation policies. It is contrary to the values of UCP for anyone to retaliate against any board member, officer, employee, or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of UCP. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

## CONFIDENTIALITY AND INTELLECTUAL PROPERTY

### Policy Statement

30 UCP has a legal and ethical responsibility to maintain the privacy of its participants, employees, donors, and volunteers. UCP must also safeguard the organization's other confidential information concerning its business practices and intellectual property. Employees are expected to protect confidential information, as described below, as well as UCP's intellectual property.

### Purpose

40 The purpose of this policy is to provide operational guidance for the proper handling of confidential information and intellectual property by employees.

### Procedures

#### Confidential Information

45 Confidential information includes, but is not limited to, program participant case file information, financial records, personnel and payroll records regarding current and past employees, employee medical record files and donor information.

50 Confidential information also includes participant protected health information ("PHI"). PHI is individually identifiable health information, in any form, about a past, present, or future physical or mental condition, which is created in the process of caring for the participant. Examples of individually identifiable information include patient name, address, date of birth, age, medical record number, phone number, fax number, and email address. All PHI including, but not limited to, medical records, diagnoses, x-rays, photos and images, recordings, prescriptions, specimens, lab work and other test results, billing records, claim data, referral authorizations and explanation of benefits must be protected.