



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 ethics which are 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 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.

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 employee 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 employees 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 employee in all interactions with the individuals we support, vendors, 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, employees 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 staff, interns, volunteers and appointees 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.

**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..*

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 gift of significant value that could influence work-related decision making, including preferential treatment.
- 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.

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

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.

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.

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 solely because of a diagnosis of a disability.

Examples of Code Breach:

- Provide differential care due to race, religion, 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.

5. Represent the Agency 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.

6. Safeguard JASA and JASA Affiliates Assets – 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.
- Falsification of timesheets or approval of a timesheet that has been falsified.
- Theft of JASA and JASA Affiliates equipment/supplies.

7. 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.

8. Comply With All Applicable Laws, Regulations, Codes, And Policies—Including State And Federal 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.

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

10. Protect Confidentiality of the Individuals We Support, the Staff Who Serve Them, and Agency-sensitive Information – All JASA and JASA Affiliates representatives and employees 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.
- Obtain an individual's diagnosis or test result without consent.
- Release names of clients outside of the workplace.
- Discussions about or conduct directed toward colleagues that is harassing or discriminatory in nature.

11. Uphold the Code of Ethics Relative to Human Service Professionals – Many positions such as Direct Support Professionals, Nurses, and Social Workers have their own Code of Ethics 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 Risk and Compliance Officer-
Debra Milton-Grant, MPH, MBA
(212) 273-5296, dmilton@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