

**BLACK FAMILY DEVELOPMENT, INC.**

**CODE  
OF  
ETHICS**

*BFDI is accredited by the "Commission on Accreditation of Rehabilitation Facilities"*  
[www.blackfamilydevelopment.org](http://www.blackfamilydevelopment.org)

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## **INTRODUCTION**

Black Family Development, Inc.'s (BFDI) Code of Ethics handbook includes an expansive array of ethical responsibilities that are standards for BFDI employees, as defined in the CARF Manual and other professional industry norms. BFDI's Code of Ethics represent the ethical codes of conduct for employees, consultants, interns, and volunteers.

The Code of Ethics handbook include ethics/areas that address:

- Business
- Marketing
- Contractual Relationships
- Conflicts of Interest
- Use of Social Media
- Service Delivery
- Professional Responsibilities
- Human Resources
- Prohibition of Waste, Fraud, Abuse, and other Wrongdoing
- Written Procedures to Deal with Allegations of Violations of Ethical Codes
- Education of Stakeholders on Ethical Codes of Conduct
- Advocacy Efforts for the Persons Served
- Corporate Citizenship

Included in this Handbook are Codes of Ethics, as well as procedures to deal with allegations of violations of ethical codes, including the no-reprisal approach for personnel reporting.

## **INPUT PROCESS/REFERENCES**

The Code of Ethics was updated by input from the management team; the 2017 CARF Behavioral Health Standards Manual; staff review; the Code of Ethics of the National Association of Social Workers and the National Association of Black Social Workers; and current changes in the field, i.e. Michigan Department of Human Services, Wayne County Department of Health, Veterans, and Community Wellness; Child Welfare Licensing Rules, and the Mental Health Code.

# BLACK FAMILY DEVELOPMENT, INC. (BFDI)

## MISSION

“To strengthen and enhance the lives of children, youth, and families through partnerships that support safe, nurturing, vibrant homes, schools, and communities”.

## GOAL

The goal is to promote wholesome family life and human growth via the development and implementation of a full range of social work services with a focus on African American families and other families experiencing a multiplicity of social problems.

## VISION

We are committed to:

- Improving the well-being of children
- Improving academic results
- Improving neighborhood safety
- Expanding positive youth development
- Improving support to families
- Building community capacity
- Achieving Promise Neighborhoods results

## VALUES AND PHILOSOPHY

BFDI's home-based model of services flows from the principle that all barriers to access must be removed. The home-based model minimally removes barriers to transportation and child care. BFDI's philosophy is based on the belief that all families have **inherent strengths** and that **their voice** must be the focus of treatment plans. This embodies a **non-deficit approach** that requires counselors to build upon client/family strengths. BFDI's **strength-based philosophy** is critical because it represents the agency's **attitudes**, purposes, and thoughts about the **people we serve**.

Every element of treatment, case management, prevention, and crisis intervention service flows from this philosophical principle. Here is where the agency's service perspectives originate regarding services. It is very important when providing home based services to have a service perspective that says “families can be helped”, and BFDI is willing to provide the full gamut of comprehensive services to persons served to do whatever necessary to help them and their families. BFDI believes that there must be a feeling of **hope emanating** from each counselor that can be conveyed to the family. The counselor must be committed to looking at a variety of options to help families; to withstand disappointments; to be willing to try and try again with families, and to give support and praise for small accomplishments. BFDI's philosophies, including our philosophy on **person-centered care**, focuses on the strengths and voice of consumers that must be incorporated in the principles of “**people first**” and **person-centered planning** throughout each of the agency's programs and services. These principles are imbedded in service documentation and in the counselor's treatment philosophy which encourages him/her to approach the family from a positive perspective. The philosophy says that persons served and their family/community benefit when the entire family is helped.

That is, family focused services versus individual focused services are key. The philosophy also promotes service **accessibility** through **strong outreach** and the provision of an array of **culturally sensitive services**.

BFDI uses a home-based model for the delivery of services. Some services may be provided in the offices or another community setting determined by the person served. However, our basic traditional approach is home-based. This model has been used since BFDI's inception in 1978, as it has proven most effective in providing services to families in distressed communities. The home-based model increases accessibility to services and **reduces barriers** to services such as architectural barriers, transportation and child care.

BFDI supports the implementation of strategies that ensure children and their families receive services in the **least restrictive** manner that provides for the needs, wants, and desires of the child and family. BFDI believes in family preservation strategies that are designed to keep families together and children safe. Every effort should be made to support family and community life that is in the best interest of the child.

### **PERSON-CENTERED CARE PHILOSOPHY**

Black Family Development, Inc. embraces a philosophy of person-centered care, which is anchored in the agency's history. The agency values consumer choice, self-determination, and the inherent rights and strengths of persons served. Embodied in this philosophy is the belief that the voice, strengths, needs, and desires of persons served should drive the person-centered planning process. We believe that persons served are the best experts of their life story and needs, and are key drivers in the planning, developing, and monitoring of services delivered and their care.

Black Family Development, Inc.'s helping professionals are supporters and facilitators of person-centered care. As in keeping with the agency's Code of Ethics, our helping professionals continuously promote service accessibility, cultural sensitivity, encouragement, and diversity, while conveying hope, dignity and respect for persons served.

## CODE OF ETHICS

### Business Practices

- *Employees must have knowledge of the legal status of persons served.*
- *Employees shall, when applicable, provide information to persons served regarding resources related to legal status and help link persons served to these resources.*
- *Employees shall behave in a manner that demonstrates dignity and respect to persons served, employees, visitors, volunteers, interns, consultants, and other stakeholders.*
- *Employees must present and maintain a professional decorum with contract agents, their employees, or other associated or third party relations.*
- *Employees must be honest and forthright in their communication, and communication about, any relationship, including dating, with any persons served; BFDI personnel; personnel of a funder, collaborative partner, or provider; or other business associate working directly or indirectly with BFDI.*
- *Employees shall adhere to BFDI's accessibility policy in the areas of, but not limited to, architecture, environment, attitudes, finances, employment, communication, and transportation.*
- *Employees shall use language that is respectful and professional when communicating with persons served, employees, visitors, volunteers, interns, consultants, and other stakeholders.*
- *Employees shall not engage in contracts or agreements with outside organizations/agencies on behalf of BFDI.*
- *All material received from conferences is the property of BFDI and shall be stamped as BFDI property, and turned in upon termination from BFDI.*
- *Employees shall behave in a trustworthy manner with those whom they serve.*
- *Employees shall consult with their immediate supervisor and refer to the agency's policy when responding to subpoenas or other legal requests for agency and/or client records.*
- *Employees shall not engage in activities that fall into the category of waste, fraud, abuse, fiscal mismanagement, and/or misrepresentation of agency funds or the funds of persons served.*
- *Employees shall not act as a witness to legal documents such as Power of Attorney, guardianship, advance directives, and/or agency contracts without the expressed written approval of the CEO, COO, or CFO.*
- *Employees shall not intentionally or unintentionally mismanage the resources of the agency or other stakeholders or persons served.*

## **Marketing Practices**

- *Employees shall behave in a manner that demonstrates dignity and respect to persons served, employees, peer supports, visitors, volunteers, interns, consultants, and other stakeholders.*
- *Employees shall give preference to the mission of the agency over any personal, business, or marketing interest.*
- *Employees should not take unfair advantage of any professional relationship or exploit others to further their personal, religious, political, business interest, or sexuality.*
- *Employees shall adhere to BFDI's accessibility policy in the areas of, but not limited to, architecture, environment, attitudes, finances, employment, communication, and transportation.*
- *Employees shall not use BFDI's business practices, marketing strategies, or service delivery protocols for personal or professional gains outside of their specific employee role within BFDI.*
- *Employees shall use language that is respectful and professional when communicating with persons served, employees, volunteers, interns, consultants, and other stakeholders.*
- *Employees shall not use any printed, audio, or visual aid materials belonging to BFDI for their personal or professional gain or benefit.*
- *Any misrepresentation of BFDI's mission, purpose, goals and objectives is prohibited.*
- *Employees may not represent or act as a spokesperson for BFDI unless previously authorized by the Chief Executive Officer or Board of Directors.*
- *Employees shall not intentionally or unintentionally mismanage the resources of the agency or other stakeholders or persons served.*

## **Contractual Relationships**

*The agency may contract with an individual or firm to perform specific tasks at an hourly rate or project cost. Individuals under contract are not considered employees of the agency, and proper credentials and proof of insurance, as appropriate, are required. The agency may request verification of licensure, certification or accreditation, and/or insurance coverage. Contractual agreements must be approved and signed by the Chief Executive Officer.*

*The relationship of a contractor to BFDI is that of an independent contractor and no benefits, whether fringe benefits or other types of benefits, will be provided as a result of the contractual agreement.*

*Employees of BFDI who may work with an independent contractor are encouraged to report any suspected abuse, neglect, waste, or wrongdoing by the independent contractor to their supervisor, another Manager, and/or the Corporate Compliance Officer.*

*See section of this manual entitled “Written Procedures for Investigating and Acting on Violations of the Code of Ethics”.*

### **Conflicts of Interest**

- *Employees shall be alert to, and avoid, conflicts of interest that interfere with the exercise of professional discretion and impartial judgment.*
- *Employees shall not engage in fundraising activities that are not sanctioned and approved by the CEO as permissible fundraising activities. Examples of fundraising activities that would not be under the domain of the agency may include: the selling of cookies, candy, tickets, or other items that are personal initiatives of an employee and/or his or her family member.*
- *Employees should inform persons served when a real, or potential, conflict of interest arises, and take reasonable steps to resolve the issue in a manner that makes the persons’ served interest primary and protects the persons’ served interest to the greatest extent possible.*
- *Employees should not directly or indirectly engage in any employment activity or enterprise which is inconsistent, incompatible, or in conflict with his/her duties as a BFDI employee, or with the duties, functions and responsibilities of the program in which he/she is employed. The policy is not meant to restrict or infringe upon the activities of the employee or his/her family, but is intended to protect the agency from instances where the achievement of its goals is impeded by the intentional or unintentional acts of its employees.*

*The following are considered to be incompatible types of activities:*

1. *Any unauthorized employment, activity, or enterprise involving the use for private gain or advantage, the agency’s time, facilities, equipment, supplies, clients, other employees, mediated materials in which the agency has proprietary interest, or the prestige of the agency or the influence of the office or position held by the employees. The examples indicated are forms of conflict of interests but are not meant to be an exhaustive list:*
  - *The directed referral (i.e., “steering”) of agency applicants, clients, and their families to any private practices in which employees or agency consultants may be engaged.*
  - *The conducting of a private practice or some other enterprise on agency facilities, utilizing agency materials, supplies, equipment, personnel, or clients.*
  - *The use for personal gain or advantage by employees or agency consultants of agency computer software curriculums, audio-visuals, graphics, or any other kind of written materials such as instructional methods, treatment methods, research instruments which have been developed by the agency, or employees or*

*consultants, either during working hours or with agency facilities, equipment, materials, personnel, clients and client families.*

*This policy is not meant to and does not preclude outside employment or activities which are, in effect, "joint ventures" between the employee and another agency. Outside employment and "joint ventures" must be reviewed by the Chief Executive Officer to determine that a conflict of interest does not exist.*

- 2. The receipt by the employee of any money, exchange of gifts, gratuities, or other consideration from anyone other than BFDI for the performance of any act which he/she would be required or expected to render in the regular course of his/her duties as a BFDI employee.*
- 3. Activity that involves so much of the employee's time that it impairs his/her attendance, effectiveness, or efficiency in the performance of his/her duties. This does not prohibit the employee from holding other employment that has been discussed by the Chief Executive Officer, so long as those hours do not overlap or coincide with his/her required time as set forth by the agency and so long as his/her work performance is not affected by the outside employment. If he/she wishes to work on a second job or equivalent, such as a private or consulting practice, he/she must give details of this to his/her supervisor and work out any conflicts through the Chief Executive Officer before accepting such employment or engaging in the enterprise.*
- 4. Full-time employment at another agency or organization that is in direct conflict with full-time employment at BFDI and is not permitted.*

### **Use of Social Media\***

*The Chief Executive Officer (CEO) is the individual authorized to communicate with the media, unless otherwise authorized by the CEO in writing. All press releases and other communications with the media must be approved by the CEO prior to dissemination. The posting of information regarding the agency on the agency's website, Facebook, Twitter, blogs, etc. must be approved by the CEO or designee. Employees shall not post information regarding persons served on the agency's website or any social media outlet, e.g. Facebook, Twitter, Instagram, YouTube, blogs, etc. Social media is not a confidential form of communication. BFDI is committed by policy, practice, and legal requirements to maintain and guard the confidentiality of all persons served. Therefore, it is the policy of BFDI that no employee may communicate or befriend a consumer of BFDI utilizing social media. This is applicable for present consumers or former consumers. Any violation of the established protocol will prompt a Corporate Compliance investigation. If you discover that you were unknowingly or unintentionally communicating with a BFDI consumer, either present or past, please submit an Incident Report to the Corporate Compliance Officer.*

*\*See Social Media Acceptable Use Policy Document for additional information.*



## **Service Delivery**

- *Employees shall ensure that the agency's person-centered care philosophy and the "people first" concept is evident in the service delivery process.*
- *Employees must ensure that all barriers to accessibility are assessed, addressed, and removed.*
- *Employees must have knowledge of the legal status of persons served.*
- *Employees shall, when applicable, provide information to persons served regarding resources related to legal status and help link persons served to these resources.*
- *Employees shall be alert to, and avoid, conflicts of interest that interfere with the exercise of professional discretion and impartial judgment.*
- *Employees should inform persons served when a real, or potential, conflict of interest arises, and take reasonable steps to resolve the issue in a manner that makes the persons' served interest primary and protects the persons' served interest to the greatest extent possible.*
- *Employees are prohibited from accepting money, exchanging gifts, gratuities, or other consideration from anyone other than BFDI for the performance of any act which he/she would be required or expected to render in the regular course of his/her duties as a BFDI employee.*
- *Employees shall not engage in fundraising activities that are not sanctioned and approved by the CEO as permissible fundraising activities. Examples of fundraising activities that would not be under the domain of the agency may include: the selling of cookies, candy, tickets, or other items that are personal initiatives of an employee and/or his or her family member.*
- *Employees, as may be appropriate in their role, shall respect and safeguard the personal property of persons served, visitors, and all property of the agency.*
- *Employees are prohibited from providing services to individuals, client's family or friends with whom they have a personal, including dating, intimate, prior or current intimate relationship.*
- *Employees shall not act as a witness to documents such as Power of Attorney, guardianship, advance directives, and/or agency contracts without the expressed written approval of the CEO, COO, or CFO.*
- *Employees shall recognize and respect the inherent dignity and worth of the person and persons within the persons served care system.*
- *Employees' primary goals are to help people in need, address social problems, and support the well-being of persons served.*

- *Employees shall challenge social injustice.*
- *Employees shall recognize the cultural, racial and ethnic importance of human relationships.*
- *Employees shall behave in a trustworthy manner with those whom they serve.*
- *Employees shall use language that is respectful and professional when communicating with persons served, employees, volunteers, interns, consultants, and other stakeholders.*
- *Employees shall adhere to BFDI's accessibility policy in the areas of, but not limited to, architecture, environment, attitudes, finances, employment, communication, and transportation.*
- *Employees shall practice within their areas of competencies and develop and enhance their professional expertise.*
- *Employees shall maintain and update their professional licenses, credentials, certifications and clinical privileges.*
- *Employees shall respect and promote the rights of persons served to self-determination, and assist persons served in their efforts to identify and clarify their goals.*
- *Employees shall write legibly and use clear, specific and understandable language in the clinical documentation of persons' served case activities.*
- *Employees shall use clear and understandable language to inform persons served of the purpose of services, and risks related to services.*
- *Employees shall use clear and understandable language to inform persons of limits to services, because of the requirements of a third party payer.*
- *Employees shall provide persons served with reasonable access to their records.*
- *Employees shall not use derogatory language in their written or verbal communication to, or about, persons served.*
- *Employees shall practice within their areas of competencies and develop and enhance their professional expertise.*
- *Employees shall use accurate and respectful communication to, and about, persons served.*
- *Employees should make reasonable efforts to ensure continuity of services in the event that services are interrupted by factors such as unavailability, relocation, illness, disability, or death.*

- *Employees are prohibited from having clients sign blank forms.*
- *Staff shall not discuss client's case information without provisions for relative confidentiality.*
- *Staff shall not leave persons' served case record information on desks, or in any other unsecured manner, thus violating persons' served confidentiality.*
- *Employees shall not intentionally or unintentionally mismanage the resources of the agency or other stakeholders.*

### **Professional Responsibilities**

- *Employees shall behave in a manner that demonstrates dignity and respect to persons served, staff members, visitors, volunteers, interns, consultants, and other stakeholders.*
- *Employees shall behave in a trustworthy manner with all stakeholders, including but not limited to, persons served, supervisors, co-workers, volunteers, visitors, interns, consultants, and funders.*
- *Employees are prohibited from engaging in verbal/sexual harassment, physical abuse or neglect of persons served or persons within the person's served care system, including person's served family or friends.*
- *Employees shall use language that is respectful and professional when communicating with persons served, employees, volunteers, interns, consultants, and other stakeholders.*
- *Employees shall not falsify agency records, persons' served records, and/or other documents associated with their employment with BFDI.*
- *Employees shall adhere to BFDI's accessibility policy in the areas of, but not limited to, architecture, environment, attitudes, finances, employment, communication, and transportation.*
- *Employees shall not divulge confidential material or information to unauthorized persons.*
- *Employees shall protect the confidentiality of persons' served written, verbal and electronic records and other sensitive information.*
- *Employees shall ensure that persons' served records are stored in a secure location, and that persons' served records are not available to others who are not authorized to have access.*
- *Employees must be courteous, respectful, and truthful to supervisors, visitors, volunteers, interns, consultants, co-workers, persons served, referring workers/agencies, and any and all other persons associated directly, or indirectly with BFDI.*

- *Employees shall provide services to persons served only in the context of a professional relationship based upon valid and informed consent.*
- *Employees shall not post any information regarding persons served on any social media outlet, e.g. Facebook, Twitter, blogs, etc.*
- *Employees shall not provide services to individuals with whom they have a personal, intimate, including dating, prior or current sexual relationship.*
- *Employees should make reasonable efforts to ensure continuity of services in the event that services are interrupted by factors such as unavailability, relocation, illness, disability, or death.*
- *Employees shall adopt the concept of extended families, kinship care and fictive kin.*
- *Employees shall accept the responsibility to advocate for persons served and protect the community in which our persons serve live against unethical and hypocritical practices by individuals or organizations engaged in social welfare activities.*
- *Employees shall not intentionally or unintentionally mismanage the resources of the agency or other stakeholders.*
- *Employees shall not engage in personal fundraising with persons served or solicit funds from persons served on behalf of a personal cause such as: selling cookies for a daughter in girl scouts; selling candy or wrapping paper for a child's school; having persons served selling items on behalf of the agency; and allowing persons served to raise funds by appeals to personnel or other persons served.*
- *Employees, as may be appropriate in their role, shall respect and safeguard the personal property of persons served, visitors, and personnel, and all property owned by the agency.*
- *Employees shall not use the agency's property for personal use. (See Personnel Policies and Procedures Manual for greater detail under "Use of Agency Property").*

## **Human Resources**

*BFDI maintains an at-will employment status. This section in the Code of Ethics under "Human Resources" is not intended to define the agency's comprehensive "Personnel Policies and Procedures" manual. Please refer to the agency's "Personnel Policies and Procedures" manual for more detailed information regarding human resources issues.*

- *Degree professional employees must practice within the legal constraints of their state license(s) and adhere to the ethics codes of their profession.*
- *Employees shall act in a manner that promotes and preserves the professional social work values and the practice standards of clinical social work.*

- *Employees shall make clear their role when speaking or acting as a private individual rather than as a professional or as a representative of a professional organization.*
- *When more than one employee is involved in the care of a person served, employees seek to coordinate treatment. They are obligated to address any collaborative issues that are not in the best interest of the person served.*

**A. Personal Behavior**

- *Employees shall behave in a manner that demonstrates dignity and respect to persons served, employees, visitors, volunteers, interns, consultants, and other stakeholders.*
- *Employees shall be honest and truthful in their documentation, reporting, communicating with their supervisor, coworker, or other management staff within the agency.*
- *Employees shall use language that is respectful and professional when communicating with persons served, employees, volunteers, interns, consultants, and other stakeholders.*
- *Employees shall adhere to BFDI's accessibility policy in the areas of, but not limited to, architecture, environment, attitudes, finances, employment, communication, and transportation.*
- *Sleeping on the job is prohibited.*
- *The use of any controlled substances while on the job, coming to the job, or while doing any related work activities, is strictly prohibited.*
- *Engaging in the sale, transfer, or use of alcohol, tobacco, or other drugs, or the abuse of over-the-counter medication, while on duty or on BFDI's premises, or in any associated activity related directly or indirectly to BFDI is strictly prohibited.*
- *Employees must maintain an acceptable self-appearance. Dress should be in accordance with the job and the dictates of the occasion.*
- *Employees are prohibited from engaging in verbal/sexual harassment, physical abuse or neglect of persons served or persons within the person's served care system, including person's served family or friends.*
- *Employees shall not use nor abuse the personal property of the agency, including telephones, computers, cell phones, copier machines, or any other equipment or property of BFDI for non BFDI-related activities.*
- *Employees are expected to perform his/her tasks on time, especially those that are a part of his/her job description.*
- *Employees shall not intentionally or unintentionally mismanage the resources of the agency or other stakeholders.*

## **B. Mandated Reporter's Requirements**

*BFDI's Code of Ethics requires a strict adherence to the Michigan Child Protection Law as it relates to the reporting of child abuse and neglect. The Michigan Child Protection Law, 1975, PA 238, requires the reporting of child abuse and neglect by certain persons (called mandated reporters), and permits the reporting of child abuse and neglect by all persons, to provide for the protection of children who are abused or neglected.*

*The law requires that mandated reporters report suspected child abuse and neglect to the Michigan Department of Health and Human Services (DHHS). The report must be made directly to DHHS. There are civil and criminal penalties for a mandated reporter's failure to make a report. Likewise, there is civil and criminal immunity for someone making a report in good faith.*

*A list of mandated reporters is as follows: A physician, dentist, physician's assistant, registered dental hygienist, medical examiner, nurse, person licensed to provide emergency medical care, audiologist, psychologist, **marriage and family therapist, licensed professional counselor, social worker, licensed master's social worker, licensed bachelor's social worker, registered social service technician, social service technician**, school administrator, school counselor, or teacher, law enforcement officer, member of the clergy, regulated child care provider, or persons employed in a professional capacity in any office of the Friend of the Court.*

*The Child Protection Law requires mandated reporters to make an immediate verbal report to DHS upon suspecting child abuse and neglect, followed by a written report within 72 hours. Reporting the suspected allegations of child abuse and/or neglect to the agency administrator does not fulfill the mandated reporting requirement to report directly to DHS. Again, the mandated reporter shall, within 72 hours of the oral report, file a written report.*

*Mandated reporters cannot be dismissed or otherwise penalized for making a report required by the Child Protection Law or for cooperating in an investigation. Strict confidentiality laws at both the state and federal level govern Child Protective Services investigations.*

*Please refer to BFDI's policy on Abuse and Neglect in BFDI's CARF Policy Manual.*

## **Prohibition of Waste, Fraud, Abuse, and other Wrongdoing**

*It is the policy of Black Family Development, Inc. (BFDI) that employees, volunteers, interns, consultants, or other stakeholders may not participate in waste, fraud, or abuse of resources or other wrongdoing, whether illegal or unethical. Ethical violations and legal/unethical wrongdoing shall be reported. Employees are encouraged to report any suspicion or evidence in the aforementioned areas to their immediate supervisor, Human Resources Director, or Corporate Compliance Officer. BFDI shall uphold a "no reprisal" approach for employees, persons served, volunteers, interns, consultants, and other stakeholders in reporting suspected incidents of waste, fraud, abuse, and other questionable or suspicious activities and practices, and/or violations of ethical codes. (See BFDI's Policy on Waste, Fraud, Abuse and Other Wrongdoing.)*

## **Written Procedures to Address Potential Exclusion of Individuals and Entities from Federally Funded Healthcare Programs.**

*A monthly background check is conducted by the Human Resources Department on all employees and consultants who deliver Medicaid billable services. This process occurs to ensure corporate compliance with Medicaid federal funding to address potential exclusion of individuals and entities from federally funded healthcare programs. (See detailed written procedures in the CARF Standards Manual.)*

## **Written Procedures to Deal with Allegations of Violations of Ethical Codes, including No Reprisal Approach**

*BFDI's Corporate Compliance Committee is comprised minimally of the Corporate Compliance Officer, Chief Financial Officer, Human Resources Manager, and Quality Assurance Director. The committee is chaired by the Corporate Compliance Officer. This committee will receive all Incident Reports containing violations of the Code of Ethics. The committee will receive the report, conduct the investigation, record the investigation, and provide feedback and follow up, as may be appropriate.*

*BFDI shall uphold a “no reprisal” concept for employees, volunteers, interns, consultants, persons served, vendor, funder, and other stakeholders in reporting suspected incidents of questionable activities and practices within the agency. Individuals are ensured that they will not be retaliated against, sanctioned, penalized, or any other type of consequences for reporting any good faith violation of waste, fraud, abuse, or other wrongdoing. BFDI's expressed statement is that no officer, manager or supervisor shall take a reprisal (retaliatory) action against any staff, volunteer, persons served, intern, consultant, vendor, funder or other stakeholder who files a complaint.*

### **A. Reporting**

*Any staff member may report a violation of the Code of Ethics verbally to the Corporate Compliance Officer. However, an Incident Report must be completed and submitted to staff's supervisor, the Corporate Compliance Officer, and the Chief Executive Officer. Staff are encouraged to report the incident within 10 working days. Reports will still be accepted if they are submitted more than 10 working days after the occurrence. The Corporate Compliance Committee will issue an annual report to the CEO and the Board of Directors on the number and types of Corporate Compliance violations.*

### **B. Investigation**

*The Corporate Compliance Committee, which consists of the Corporate Compliance Officer, Chief Financial Officer, and Human Resources Manager, will investigate the report within five (5) business days of receiving the report, and complete the investigation with a final report completed within 15 days. The CEO will facilitate and approve the recommendations of the committee, which may include training, supervision, and/or disciplinary action.*

*If the agency receives a complaint of Medicaid fraud or abuse from any source or identifies any questionable practices, it must conduct a preliminary investigation to*

*determine whether there is sufficient basis to warrant a full investigation, in accordance with conditions of the Center for Medicare and Medicaid Services (42 CFR 455.15).*

**C. Acting on Violation**

*If there is sufficient evidence, as determined by the investigation, a report and recommendation will be submitted to the CEO by the Corporate Compliance Committee. The CEO will facilitate and approve the recommendations of the committee, which may include, but not limited to: a number of corrective action strategies, including training, supervision, and/or disciplinary action.*

**D. Documenting the Investigation**

*The Corporate Compliance Committee will maintain a log of all Code of Ethics investigations and report same to the CEO on an annual basis. In addition to maintaining a log, the committee will use the following process:*

- *Create a separate file for the investigation.*
- *The investigation file should include:*
  - *The complaint*
  - *The Report of Investigation*

*The Corporate Compliance Officer will report to the Board on an annual basis an analysis on Code of Ethics violations and/or trends and patterns.*

**Monitoring**

*The Corporate Compliance Committee shall ensure that the Code of Ethics is clearly communicated to staff on an ongoing basis. The methods of communication will be as follows:*

- *Each new hire, whether full-time, part-time, or contractual, will receive a copy of the Code of Ethics on their first day of employment.*
- *Each new hire will sign off acknowledging receipt and understanding of BFDI's Code of Ethics.*
- *The Code of Ethics will be shared with staff at the agency new staff orientation training.*
- *The Compliance Officer will monitor trends, patterns, and code violations and recommend to the CEO additional training or supervision strategies to reinforce compliance with the Code of Ethics.*

**Education on Ethical Codes of Conduct for Personnel and Other Stakeholders**

*BFDI continues to support training and education for staff to remain in compliance and current in their respective field in order to demonstrate strategies and interventions that are based on accepted practices and current research, evidence-based practice, peer-reviewed scientific and health-related publications, clinical practice guidelines, and/or expert professional consensus.*



*Leadership supports and sponsors online access to learning opportunities and reference materials through webinars for staff and stakeholders/collaborative partners; agency subscribes to magazine and subscriptions related to relevant fields; agency collaborates with other organizations/schools for in-service workshops and community meetings; and agency supports time off and financial assistance for staff to attend conferences.*

*The Corporate Compliance Officer remains current on policies and practices in the field via online training documents and printed publications/books.*

## **Advocacy**

*BFDI continues to advocate for persons served, personnel, and other community stakeholders. BFDI's advocacy efforts include conducting and participating in public education or activities that promote the elimination of discrimination and stigma for the persons served. BFDI incorporates the use of "people first" language in its publications, operations, and activities. BFDI personnel participate in a variety of public education efforts, community boards and committees, newspaper articles, and radio and television presentations.*

*BFDI's advocacy efforts also include providing oral testimony, and developing and submitting position statements that support the needs of persons served and/or the needs for policy revisions at the local, state, and federal levels. BFDI works in collaboration with other organizations to coordinate our advocacy efforts on behalf of not only persons served, but BFDI's general geographic service area as well.*

*BFDI will continue to demonstrate a commitment and value for advocacy services on behalf of persons served through a number of venues, including the recipient rights process, corporate responsibility strategies, and as a part of ongoing service delivery.*

*The continuum of advocacy services will include from time to time, based upon the changing needs of persons served and the community, the following:*

- *Linking persons served to local advocacy groups, agencies, and organizations*
- *Personal Advocacy: One-on-one advocacy to secure the rights of the persons served.*
- *Systems Advocacy: Seeking to change a policy or practice that affects the person served.*
- *Legislative Advocacy as permitted by law: Seeking legislative enactments that would enhance the rights of and/or opportunities for the person served.*
- *Legal Advocacy: Using the judicial and quasi-judicial systems to protect the rights of the person served.*
- *Self-Advocacy: Enabling the person served to advocate on his/her own behalf.*

## **Corporate Citizenship**

*BFDI encourages corporate responsibility at all levels of the agency. Corporate responsibility demonstrates what an agency stands for including its ethical, social, and environmental values. It involves creating, communicating, and balancing value for all stakeholders. Corporate responsibility assists in: advocating for the persons served; promoting ethical business practices; developing efficiency as an agency; and considering the impact of agency activities on persons served, personnel, other stakeholders, and the environment.*

*The participation of staff in corporate responsibility activities requires communicating with the CEO and receiving approval from the CEO for corporate responsibility activities that must be conducted during the course of the regular work day. BFDI provides reasonable accommodations to promote equal opportunities for participation throughout all levels of the agency.*

*BFDI has expanded its corporate responsibility statement, as more of its staff are volunteering to support the needs and activities of persons served during after-work hours. Also, more of BFDI's leadership is serving on community Boards, Commissions, Ad-Hoc Committees, and Task Force Groups at the federal, state and local levels. BFDI supports the involvement of staff in corporate responsibility activities as a way to not only advance the mission, philosophy, values and goals of the agency, but to advocate for the needs, wants, and desires of persons served and the community.*

*BFDI's corporate responsibility is also evident through our funding of and consultation with grass-roots or community-based organizations, and governmental, public and private organizations. BFDI provides training, consultation, and/or mentoring to organizations who may experience challenges in aspiring to excellence in their business practices and/or services to persons served.*

*The leadership of BFDI is serving in gubernatorial and mayoral appointed positions and other local advocacy and network groups to improve funding, policies, and services to the most at-risk and disenfranchised groups/families in our community.*

### **Peer Support Services**

*Youth and Parent Support Persons are distinguished in their role with BFDI consumers in that they perform essential skills that do not require professional licensure, degreed training, or other state-required credentials. Therefore, Youth and Parent Support Persons shall not be asked, or permitted, to perform services as an employed BFDI case manager, counselor, or therapist.*

*Peer support persons are not to address consumer crises (i.e., outbreak of physical illness, suicidality, homicidal, feelings of hopeless/despair, seemingly uncontrolled anger, child mismanagement, unaddressed legal matters). The assigned therapist and program supervisor are to be engaged immediately to help the persons served de-escalate and navigate through untoward emotions and/or events, up to and including, involving professional emergency and/or medical personnel.*

*Peer supports, like other BFDI staff, must adhere to HIPAA confidentiality policies, and shall not discuss consumers, or their work with consumers, on social media.*

**Black Family Development, Inc.  
Code of Ethics**

**Verification Page**

***My signature indicates receipt of and understanding of Black Family Development, Inc.'s Code of Ethics handbook.***

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***Signature***

***Date***

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***Print Name***

Rev. 5/02, 8/02, 10/02, 7/03, 7/04, 8/05, 10/06, 8/07, 7/08, 3/09, 6/11, 5/13, 6/14, 7/15, 6/17