

SCHREIBER PEDIATRIC REHAB CENTER OF LANCASTER COUNTY
ADMINISTRATIVE POLICIES AND PROCEDURES

SECTION: Administration
SUBJECT: Code of Ethics

POLICY NO. 134
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I. POLICY

The Schreiber Pediatric Rehab Center will maintain a code of ethics that declares the ethical values and standards of professional practice which employees and volunteers embrace and which they strive to uphold in their job responsibilities.

II. PHILOSOPHY

The Schreiber Pediatric Rehab Center is committed to maintaining the highest level of ethical standards in its daily client treatment and business functions.

III. PURPOSE

The purpose of this policy is to help the Schreiber Pediatric Rehab Center's staff and volunteers better serve the clients, families, and community by acting in a manner consistent with the Center's and society's ethical expectations.

IV. RESPONSIBILITY

A. The governing Board of Directors, volunteers, and employees of the Schreiber Pediatric Rehab Center will:

1. Treat all people with dignity and respect.
2. Foster cultural diversity.
3. Value the privacy, freedom of choice, and interests of all those affected by their actions.
4. Put charitable mission above personal gain.
5. Recognize individual boundaries of competence and be forthcoming about professional qualifications and credentials.
6. Actively encourage all colleagues to embrace and practice these ethical principles.
7. Adhere to standards of professional practice within their discipline, as published by individual professional societies.
8. Comply with all applicable local, state, provincial, and federal, civil, and criminal laws.
9. Report any breach of this policy by anyone covered by this policy to their immediate supervisor

V. DISTRIBUTION

A. This policy is to be reviewed with all new employees, volunteers, and Board members, on an individual basis, during orientation. This policy will also be reviewed annually with all employees during his/her performance evaluation and with Board members at its annual review of corporate documents in September, obtaining signature confirmation.

B. This policy is to be posted on the Center's bulletin board in the Lobby and will be reviewed with all new clients at the time of admission.

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- C. A copy of this policy will be sent to purchasers of services and others on an as-needed basis.

VI. PROFESSIONAL STANDARDS

A. Laws and Regulations

1. It is the policy of the Schreiber Pediatric Rehab Center that the governing Board, volunteers, and employees adhere to all applicable state and federal criminal laws and that anyone found violating these laws could face disciplinary action and/or possible discharge. These laws forbid criminal activities such as, but are not limited to:
 - a. Accepting a fee, commission, or gift for obtaining a contract.
 - b. Stealing, embezzling, or misapplying the Center's funds or assets.
 - c. Using threats, physical force, or unauthorized means to collect money.
 - d. Falsifying or altering legal documents, contracts, etc.
 - e. Additional information may be found in Human Resources Policy #19, Termination, Discipline and Discharge

2. It is also the policy of the Schreiber Pediatric Rehab Center that the governing Board, employees, and volunteers adhere to all anti-trust laws, which prohibit any combination, conspiracy, or agreement among competitors to restrict or prevent competition. Activities which are forbidden under these laws include, but are not limited to:
 - a. Entering into any agreement (whether expressed or implied, written or oral, formal or informal) with a competitor in regard to prices, fees, or conditions for purchasing a service or product.
 - b. Exchanging or discussing information with a competitor about the Center's prices, fees, or conditions for purchasing a service or product.
 - c. Entering into any understanding or agreement (whether expressed or implied, written or oral, formal or informal) with a competitor to exclude another organization or competitor from normal business functions, such as referrals.

B. Clinical Care/Treatment

1. The Schreiber Pediatric Rehab Center is dedicated to providing services and treatment of the highest quality to its clients. Clients will be admitted, treated, transferred, and/or discharged based on their clinical and/or educational needs and without regard to ancestry, color, disability, national origin, race, religious creed, sex, or the ability to pay for services rendered.

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2. Within the limits of resources in all types of payment systems, the Schreiber Pediatric Rehab Center will experience continuing pressure to keep expenses down. Appropriate utilization of these decreasing resources will be particularly important in managing client treatment. Because of this, the Schreiber Pediatric Rehab Center will continue to:
 - a. Make decisions as to the appropriateness of care for each child on an individual basis.
 - b. Make decisions about resource allocation among services based on community need.
 - c. Maintain the client/family role in deciding appropriate care by providing them with complete and accurate information about types of treatments from which they can choose.
 - d. Support the development and acceptance of information on productivity, effectiveness, and outcome of care, in order to maintain high quality care in a cost-effective manner.

C. Confidential Information

1. Client Information

The Schreiber Pediatric Rehab Center recognizes that clients have the right to expect that all communication and records pertaining to their care will be treated in compliance to HIPAA as confidential by the Center's employees. Every employee is expected to respect the client's privacy and confidentiality of all medical care information and should be aware of the following guidelines.

- a. Information about a client should not be given to anyone without the written permission of the parent(s).
- b. Only employees with a job related reason may have access to any portion of a client's medical record.
- c. Discussion about clients or families of clients held in hallways, waiting rooms, reception areas, or anywhere else that unauthorized persons can overhear is to be avoided.
- d. Any employee who is found, upon appropriate investigation, to be responsible indiscriminately of accessing or divulging patient care information or allowing an unauthorized employee or person(s) access to such information, either written or spoken, is subject to disciplinary action and possible discharge in accordance with the Center's Human Resources Policy No. 19, Termination, Discipline, and Discharge.

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D. Business Information

The Center also recognizes that protecting its business information is crucial. The Board of Directors and employees are expected to keep this information confidential, which includes but is not limited to:

1. Information related to the Center's goals and objectives, strategic plan, and competitive position.
2. All financial information including annual budgets, revenues, expenses, capital expenditures, equipment purchases, debt, payroll information, and future financial plans.
3. Quality reports, statistical data about the Center, and malpractice and risk management information.

E. Financial Affairs

1. Billing

The Schreiber Pediatric Rehab Center will invoice patients or third parties only for services actually provided to the clients and will provide assistance to clients/families in order to help them understand charges related to their care. All billing and collection practices will be compatible with applicable state and federal laws. Billing conflicts will be resolved by following the process and chain of command outlined in Policy No. 126, Patient Grievance Procedure. Payors will also be treated with dignity and respect. Most importantly, the Schreiber Pediatric Rehab Center will not turn away clients who are in need of our services based on their ability to pay or based on any other factors that are substantially unrelated to client care.

2. Financial Reporting

The Schreiber Pediatric Rehab Center will honestly report the Center's financial progress to the employees and community. Financial communications and disclosures will be clear, accurate, and thorough to assure that they are not misleading.

F. Advertising/Marketing/Communications

Advertising, marketing, and communications are to be used to advance the goals and objectives of the Schreiber Pediatric Rehab Center as well as support its mission. Communications should convey the scope and quality of the services provided by the Center, as well as the way that these services are assessed. These tools are also to be used to educate the public, report to the community, to recruit employees, and to increase support for the Center. All messages are to be honest in their content, candid, accurate and appropriate to the needs of the Center and its audiences. The Center will not use any information that has been generated or appropriately acquired by/from another business for Center purposes. All media requests for information are to be directed to the President or his/her designee. If staff are approached by the media, they are to respond, "No Comment".

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G. Conflict of Interest

The Schreiber Pediatric Rehab Center recognizes that the potential for conflict of interest may exist among those who participate in the Center and the Center's business or client care decisions. It is our policy to request the disclosure of potential conflicts of interest to the President's office so that appropriate actions may be taken to ensure that such conflict is not inappropriate or unethical. Conflicts between clients/families and their therapist/teacher will be identified and handled in a sensitive and professional fashion. Conflicts between Board members, volunteers, employees, or the clients and their families will be resolved fairly and objectively. Available methods to resolve such conflicts include individual negotiations, group meetings, review by other staff members/administrators/Board members, or the use of a facilitator.

Conflicts of interest include, but are not limited to:

1. Using your position for personal gain or to promote or accomplish a personal agenda.
2. Using your position to advance or protect a philosophical or political cause at the Center's expense.
3. Accepting any gift or gratuity, that is more than of nominal value, from entities that do business with the Center.
4. Use Center resources (such as equipment or personnel) to earn money or compensation for personal benefit.
5. Transacting business between the Center or another organization in which you personally have an undisclosed vested interest.

H. Safe Harbor Rule

Reprisals against any staff member, client, visitor or persons-at-large that reports an act of waste, fraud, abuse and other wrong doings is strictly prohibited by Schreiber Pediatric Rehab Center and will not be tolerated. If for any reason staff is retaliated against, staff is urged to seek counsel with their department manager or the Compliance Officer. The Compliance Officer shall investigate any and all retaliatory acts and report his or her findings to the Executive Committee for disposition. From the time the Compliance Officer is made aware of these acts, the process shall take no longer than thirty (30) days to resolve.

I Document Witnessing

The process of document witnessing is to verify that the signatures on the document belong to the person with that name. Employees of the Center may be asked to witness parents' and/or Center documents. Individuals witnessing the signature must be sure that they have no direct interest in the document being witnessed. For clients, staff and family members, the Center has a Notary on staff to assist in processing of Center-related documents.

VII. DATE WRITTEN: 9/30/96

VIII. DATE REVIEWED: 12/28/98, 1/17/2000, 10/2005, 11/2007, 9/2011, 3/2012

President