



Code of Conduct

Contents

SECTION I: FCS' COMMITMENT TO ETHICS & COMPLIANCE	3
SECTION II: STANDARD OF CONDUCT.....	4
Business Practices:.....	4
Marketing Practices:	5
Contractual Relationships.....	5
Conflicts of Interest	6
Use of Social Media	7
Service Delivery.....	7
Professional Responsibilities.....	10
Human Resources	11
7. Personal Behavior	11
8. Mandated Reporter's Requirements	12
Organizational Fundraising.....	13
Prohibition of Waste, Fraud, and Abuse.....	13
SECTION III: WRITTEN PROCEDURES TO DEAL WITH ALLEGATIONS OF VIOLATION OF CODE OF ETHICS.....	14
Reporting Suspected Violations.....	14
Accurate and Prompt Reporting.....	14
Investigation of Suspected Violations	14
Acting on Violation	15
Documenting the Investigation.....	15
Government Investigations.....	15
Discipline for Violations:	15
Questions Regarding the Code.....	16
Monitoring.....	16
SECTION IV: EDUCATION ON ETHICAL CODES OF CONDUCT FOR PERSONNEL AND OTHER STAKEHOLDERS	16
SECTION V: ADVOCACY	17
SECTION VI: CORPORATE CITIZENSHIP	17

SECTION I: FCS' COMMITMENT TO ETHICS & COMPLIANCE

Family & Children's Services of Mid-Michigan (FCS) has a proud history of providing exemplary social support and mental health treatment services to children, adults, and families based on principle of ethical and responsible conduct. Every representative of FCS is expected to adhere to the high standards of conduct outlined in the organization compliance program (Code) in action taken on behalf of the Agency. As employed in this Code, the following definitions apply:

1. Family & Children's Services representatives: Representatives, members of the Board of Directors, staff, volunteers, student interns, legal affiliates, and contract providers.
2. Agency: Family & Children's Services of Mid-Michigan

The Chief Executive Officer (CEO) shall have the ultimate authority and responsibility for the implementation of a viable organization compliance program. Specifically, the CEO and or their designee, shall have authority and responsibility to comply with all governmental laws and regulations including quality of care issues related to individuals served; financial arrangements with collateral parties that may affect services provided; the implementation of all necessary and required actions to assure prevention of fraud and abuse; and the reporting of misconduct to enforcement authorities.

The Code is intended to define the standards of conduct expected of FCS' representatives, to provide guidance to resolve questions regarding legal and ethical issues, and to establish a process for reporting possible violation of the law or ethical principles within the Agency.

The appointment and retention of any FCS representative is contingent upon acceptance and compliance with the Code. It is expected that outside colleagues (e.g., vendors, consultants, and other) whose actions could be attributed to the work of FCS will adhere to similar standards in their dealing with the agency and others on its behalf.

A basic Statement of Ethics serves as the platform for the organization compliance code. Each Board member, staff member, student intern, and volunteer is expected to read and sign the Statement of Ethics when beginning a formal association with FCS. The activities of other representatives of FCS, as contract providers, consultants, or vendors, are to be overseen by FCS staff in accordance with the Statement of Ethics.

SECTION II: STANDARD OF CONDUCT

Representatives of FCS are expected to act with the highest ethical and responsible conduct. A report must be filed immediately if an FCS representative detects or suspects any improper activities by a representative or agent of the agency, or by a person with whom the agency conducts business, so that an appropriate investigation can be initiated. Withholding knowledge of improper activities is a violation of the Code. If evidence of a violation of this Code is confirmed, any involved FCS representative may be subject to disciplinary action, up to and including dismissal, consistent with the applicable Agency human resources policies or contract cancellations. Any and all evidence will be reviewed by the CEO or designee for organization compliance, and, when appropriate, legal counsel. Any representative who, in good faith, makes a report of a suspected violation will be assured all reasonable efforts to maintain confidentiality and protection against retaliatory action.

FCS representatives are expected to adhere to the following:

Business Practices:

1. Representatives shall behave in a manner that demonstrates dignity and respect to persons served, staff members, visitors, volunteers, and other stakeholders.
2. Representatives must present and maintain a professional decorum with contract agents, their representatives, or other associated or third party relations.
3. Representatives must be honest and forthright in their communication, and communication about, any relationship, including dating, with any persons served; FCS personnel; personnel of a funder, collaborative partner, or provider; or other business associate working directly or indirectly with FCS.
4. Representatives shall adhere to FCS' Accessibility Concerns and Barrier Identification Policy in the areas of, but not limited to, architecture, environment, attitudes, finances, employment, communication, transportation, and technology.
5. Representatives shall use language that is respectful and professional when communicating with persons served, representatives, volunteers, and other stakeholders.
6. Representatives shall not engage in contracts or agreements with any external organization or agency on behalf of FCS, unless delegated authority by the Board of Directors.
7. Representatives shall behave in a trustworthy manner with those whom they serve.
8. Representatives 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.
9. Representatives shall not engage in activities that fall into the category of fraud, waste, abuse, fiscal mismanagement, and/or misrepresentation of organizational funds or the funds of persons served.
10. Representatives shall not act (sign) as a witness to documents such as Power of Attorney, guardianship, advance directives, or other external legal documents for or on behalf of persons served at FCS.
11. Representatives shall not intentionally or unintentionally mismanage the resources of the organization or other stakeholders or persons served.

12. The Agency employs only person who are legally authorized to work in the United States consistent with federal laws; appropriate documentation must be presented at time of hire

Marketing Practices:

1. Representatives shall behave in a manner that demonstrates dignity and respect to persons served, staff members, peer supports, visitors, volunteers, and other stakeholders
2. Representatives shall give preference to the mission of the organization over any personal, business, or marketing interest.
3. Representatives should not take unfair advantage of any professional relationship or exploit others to further their personal, religious, political, business interest, or sexuality.
4. Representatives shall adhere to FCS' Accessibility Concerns and Barrier Identification Policy in the areas of, but not limited to, architecture, environment, attitudes, finances, employment, communication, transportation, and technology.
5. Representatives shall not use FCS' business practices, marketing strategies, or service delivery protocols for personal or professional gains outside of their specific representative role within FCS.
6. Representatives shall use language that is respectful and professional when communicating with persons served, representatives, volunteers, and other stakeholders.
7. Representatives shall not use any printed, audio, or visual aid materials belonging to FCS for their personal or professional gain or benefit.
8. Any misrepresentation of FCS' mission, purpose, vision, goals, and objectives is prohibited.
9. Representatives may not represent or act as a spokesperson for FCS unless previously authorized by the CEO or Board of Directors.
10. Representatives shall not intentionally or unintentionally mismanage the resources of the organization or other stakeholders or persons served.

Contractual Relationships:

1. The Agency may contract with an individual or organization to perform specific tasks at an hourly rate or project cost. Individuals under contract are not considered representatives 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.
2. Contractual agreements must be approved and signed by the CEO.
3. The relationship of a contractor to FCS 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.
4. Representatives of FCS 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 and/or the Compliance Officer.
5. See section of this Code entitled "Written Procedures for Investigating and Acting on Violations of the Code of Ethics".

Conflicts of Interest:

1. Representatives shall be alert to, and avoid, conflicts of interest that interfere with the exercise of professional discretion and impartial judgment.
2. Representatives 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 organization may include: the selling of cookies, candy, tickets, or other items that are personal initiatives of an representative and/or their family member.
3. Representatives 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.
4. Representatives should not directly or indirectly engage in any employment activity or enterprise which is inconsistent, incompatible, or in conflict with their duties as a FCS representative, or with the duties, functions, and responsibilities of the program in which they are employed. The policy is not meant to restrict or infringe upon the activities of the representative or their family, but is intended to protect the Agency from instances where the achievement of its mission is impeded by the intentional or unintentional acts of its representatives.
5. The following are considered to be incompatible types of activities:
 - a. Any unauthorized employment, activity, or enterprise involving the use for private gain or advantage, the Agency's time, facilities, equipment, supplies, clients, other representatives, mediated materials in which the agency has proprietary interest, or the prestige of the agency or the influence of the position held by the representatives. The examples indicated are forms of conflict of interests but are not meant to be an exhaustive list:
 - 1) The directed referral (i.e., "steering") of Agency applicants, clients, and their families to any private practices in which representatives or Agency consultants may be engaged.
 - 2) The conducting of a private practice or some other enterprise in Agency facilities utilizing agency materials, supplies, equipment, personnel, or clients.
 - 3) The use for personal gain or advantage by representatives 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 representatives or consultants, either during working hours or with agency facilities, equipment, materials, personnel, clients and client families.
 - 4) The terms outlined in this Code are not meant to and do not preclude outside employment or activities which are, in effect, "joint ventures" between the representative and another agency. Outside employment and "joint ventures" must be reviewed by the CEO to determine that a conflict of interest does not exist.
 - b. The receipt by the representative of any money, exchange of gifts, gratuities, or other

consideration from anyone other than FCS for the performance of any act which they would be required or expected to render in the regular course of their duties as a FCS representative.

- c. Activity that involves so much of the representative's time that it impairs their attendance, effectiveness, or efficiency in the performance of their duties. This does not prohibit the representative from holding other employment that has been discussed by the CEO, so long as those hours do not overlap or coincide with their required time as set forth by the agency and so long as their work performance is not affected by the outside employment. If an representative wishes to work on a second job or equivalent, such as a private or consulting practice, they must give details of this to their supervisor and work out any conflicts through the CEO before accepting such employment or engaging in the enterprise.
- d. Full-time employment at another agency or organization that is in direct conflict with full-time employment at FCS, and is not permitted.

Use of Social Media:

1. The CEO, Director of Fund Development, and/or their designee are the individuals authorized to communicate with the media on behalf of FCS, unless otherwise authorized by the CEO, in writing.
2. All FCS press releases and other communications with the media must be approved by the CEO prior to dissemination.
3. FCS respects the right of any representative to engage in online social networking using the Internet and other technology.
4. The posting of information regarding the Agency on the organization's website, Facebook, Twitter, blogs, etc. must be approved by the CEO or designee. Representatives shall not post information regarding persons served on the organization's website or any social media outlet (e.g., Facebook, Twitter, blogs, etc.); social media is not a confidential form of communication.
5. FCS is committed by policy, practice, and legal requirements to maintain and guard the confidentiality of all persons served; therefore, all policies regarding confidentiality and personnel policies such as those prohibiting harassment and discrimination should be followed; information regarding persons receiving services must not be disclosed.
6. Representatives who mention FCS while engaging in social networking and also expressing political opinion or an opinion regarding the Agency's actions, must also specifically note that the opinion expressed is their own personal and not the Agency's opinion.
7. All social media data that is composed, transmitted, or received via computer communications systems is considered to be part of official records of FCS, and as such, is subject to disclosure to law enforcement and other third parties; consequently, representatives should always ensure that the business information contained in internet transmission is accurate, appropriate, ethical, and lawful.

Service Delivery:

1. Representatives shall ensure that FCS' person-centered planning philosophy is evident in the service delivery process.

2. Representatives shall maintain the confidentiality of persons served, unless otherwise required by law (e.g., mandated reporting).
3. Representatives must ensure that all barriers to accessibility are assessed, addressed, and removed.
4. Representatives shall, when applicable, provide information to persons served regarding resources related to legal status and help link persons served to these resources.
5. Representatives shall be alert to, and avoid, conflicts of interest that interfere with the exercise of professional discretion and impartial judgment.
6. Representatives 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.
7. Representatives are prohibited from accepting money, exchanging gifts, gratuities, or other consideration from anyone other than FCS for the performance of any act which they would be required or expected to render in the regular course of their duties as a FCS representative.
8. Representatives 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 organization may include: the selling of cookies, candy, tickets, or other items that are personal initiatives of an representative and/or their family member.
9. FCS assumes no liability whatsoever for the damage, loss, or theft caused by third parties to the personal property of staff members.
10. Representatives should not expect that any property of FCS would be treated as private and personal to the representative, this includes but is not limited to: all storage facilities, offices, or workspaces, including desks. Any furniture or other items belonging to staff members in the building for Agency use or that house Agency materials are also subject to access.
11. Representatives, as may be appropriate in their role, shall respect and safeguard the personal property of persons served, visitors, and all property of the organization.
12. Representatives 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.
13. Representatives shall not act (sign) as a witness to documents such as Power of Attorney, guardianship, advance directives, or other external legal documents for or on behalf of persons served at FCS.
14. Representatives shall recognize and respect the inherent dignity and worth of the person and persons within the persons served care system.

15. Representatives' primary goals are to help people in need, address social problems, and support the well-being of persons served.
16. Representatives shall recognize the cultural, racial, and ethnic importance of human relationships.
17. Representatives shall behave in a trustworthy manner with those whom they serve.
18. Representatives shall use language that is respectful and professional when communicating with persons served, representatives, volunteers, and other stakeholders.
19. Representatives shall adhere to FCS' Accessibility Concerns and Barrier Identification Policy in the areas of, but not limited to, architecture, environment, attitudes, finances, employment, communication, transportation, and technology.
20. Representatives shall practice within their areas of competencies and develop and enhance their professional expertise.
21. Representatives shall maintain and update their professional licenses, credentials, certifications, and clinical privileges.
22. Representatives 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.
23. Representatives shall write legibly and use clear, specific, and understandable language in the both written and electronic clinical documentation of persons' served.
24. Representatives shall use clear and understandable language to inform persons served of the purpose of services and risks related to services.
25. Representatives shall use clear and understandable language to inform persons of limits to services, because of the requirements of a third party payer.
26. Representatives shall provide persons served with reasonable access to their records.
27. Representatives shall not use derogatory language in their written or verbal communication to, or about, persons served.
28. Representatives shall use accurate and respectful communication to, and about, persons served.
29. Representatives 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.
30. Representatives are prohibited from having clients sign blank forms.
31. Representatives shall not discuss client's case information without provisions for relative confidentiality.

32. Representatives shall not leave persons' served case records in any unsecured manner, thus violating persons' served confidentiality.
33. Representatives shall not intentionally or unintentionally mismanage the resources of the organization or other stakeholders.

Professional Responsibilities:

1. Representatives shall behave in a manner that demonstrates dignity and respect to persons served, staff members, visitors, volunteers, and other stakeholders.
2. Representatives shall behave in a trustworthy manner with all stakeholders, including but not limited to, persons served, supervisors, co-workers, volunteers, visitors, and funders.
3. Representatives are prohibited from engaging in verbal/sexual harassment, physical abuse, or neglect of persons served, including person's served family or friends.
4. Representatives shall use language that is respectful and professional when communicating with persons served, representatives, volunteers, and other stakeholders.
5. Representatives shall not falsify agency records, persons' served records, and/or other documents associated with their employment with FCS.
6. Representatives shall adhere to FCS' Accessibility Concerns and Barrier Identification Policy in the areas of, but not limited to, architecture, environment, attitudes, finances, employment, communication, transportation, and technology.
7. Representatives shall not divulge confidential material or information to unauthorized persons.
8. Representatives shall protect the confidentiality of persons' served written, verbal, and electronic records and other sensitive information.
9. Representatives 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.
10. Representatives must be courteous, respectful, and truthful to supervisors, visitors, volunteers, co-workers, persons served, referring workers/agencies, and any and all other persons associated directly, or indirectly with FCS.
11. Representatives shall provide services to persons served only in the context of a professional relationship based upon valid and informed consent.
12. Representatives shall not post any information regarding persons served on any social media outlet, e.g., Facebook, Twitter, blogs, etc.
13. Representatives shall not provide services to individuals with whom they have a personal, intimate, including dating, prior, or current sexual relationship.

14. Representatives 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.
15. Representatives 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.
16. Representatives shall not intentionally or unintentionally mismanage the resources of the organization or other stakeholders.
17. Representatives 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; selling candy or wrapping paper for a child's school; and having persons served selling items on behalf of the organization.
18. Representatives, 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 organization.
19. Representatives shall not use the organization's property for personal use.

Human Resources:

1. FCS maintains an at-will employment status
2. This section of the Code of Conduct is not intended to define the Agency's Representative Handbook. Please refer to the Agency's Representative Handbook for more detailed information regarding human resources issues.
3. Degree professional representatives must practice within the legal constraints of their state license(s) and adhere to the ethics codes of their profession.
4. Representatives shall act in a manner that promotes and preserves the professional social work and licensed professional counselor values and the practice standards of clinical social work and professional counseling.
5. Representatives 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.
6. When more than one representative is involved in the care of a person served, representatives seek to coordinate treatment; they are obligated to address any collaborative issues that are not in the best interest of the person served.

7. Personal Behavior:

- a. Representatives shall behave in a manner that demonstrates dignity and respect to persons served, staff members, visitors, volunteers, and other stakeholders.
- b. Representatives shall be honest and truthful in their documentation, reporting, communicating with their supervisor, coworker, or other management staff within the organization.
- c. Representatives shall use language that is respectful and professional when

communicating with persons served, representatives, volunteers, and other stakeholders.

- d. Representatives shall adhere to FCS' Accessibility Concerns and Barrier Identification Policy in the areas of, but not limited to, architecture, environment, attitudes, finances, employment, communication, transportation, and technology.
- e. Sleeping on the job is prohibited.
- f. The use of any controlled substances while on the job, coming to the job, or while doing any related work activities, is strictly prohibited.
- g. 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 FCS' premises, or in any associated activity related directly or indirectly to FCS is strictly prohibited.
- h. Representatives must maintain an acceptable self-appearance. Dress should be in accordance with the job and the dictates of the occasion.
- i. Representatives 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.
- j. Representatives 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 FCS for non FCS-related activities.
- k. Representatives are expected to perform their tasks on time, especially those that are a part of their job description.
- l. Representatives shall not intentionally or unintentionally mismanage the resources of the organization or other stakeholders.

8. Mandated Reporter's Requirements:

- a. FCS 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.
- b. 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.
- c. All clinical staff are considered mandated reporters.
- d. The Child Protection Law requires mandated reporters to make an immediate report to DHHS upon suspecting child abuse and neglect. 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 DHHS.
- e. Mandated reporters cannot be dismissed or otherwise penalized for making a report required by the Child Protection Law or for cooperating in an investigation.
- f. Strict confidentiality laws at both the state and federal level govern Child Protective Services investigations.
- g. Please refer to FCS' Mandated Reporting Procedure for instructions and timelines.

Organizational Fundraising:

1. FCS adheres to the fund raising standards promoted by the Association of Fundraising Professionals. Only fund raising activities that benefit FCS and its programs or services are allowed, unless specifically authorized by the CEO or designee. Fund raising events must be consistent with the mission, goals, mandates, and values of the agency.
2. All fund raising events or activities must be reported to the Board of Directors to avoid conflict or potential damage to a relationship with a donor.
3. Fund raising reports are issued regularly and comply with the applicable laws and regulations associated with FCS' licenses and not-for-profit law.
4. FCS subscribes to the Donor's Bill of Rights issued by the Association of Fund Raising Professionals:
 - a. To be informed of FCS' mission, of the way it intends to use donated resources, and of its capacity to use donations effectively for the intended purposes.
 - b. To be informed of the identity of those serving on FCS' Board or Directors, and to expect the board to exercise prudent judgment in its stewardship responsibilities.
 - c. To have access to FCS' most recent financial statements.
 - d. To be assured that gifts to FCS will be used for the purposes for which they were given.
 - e. To receive appropriate acknowledgment and recognition.
 - f. To be assured that information about individual donations is handled with respect and with confidentiality to the extent provided by law.
 - g. To expect that all relationships with individuals representing FCS' operations or programs that are of interest to the donor will be professional in nature.
 - h. To be informed whether those seeking donations are volunteers, representatives of FCS or hired solicitors.
 - i. To be assured that any FCS donor's name will not be shared with any other organization without the expressed permission of the donor.
 - j. To feel free to ask questions when making a donation and to receive prompt, truthful and forthright answers.

Prohibition of Waste, Fraud, and Abuse:

1. Representatives, volunteers, or other stakeholders of FCS may not participate in fraud, abuse, waste of resources or other wrongdoing, whether illegal or unethical. Ethical violations and legal/unethical wrongdoing shall be reported.
2. Representatives are encouraged to report any suspicion or evidence in the aforementioned areas to their immediate supervisor or the CEO.
3. FCS shall uphold a "no reprisal" approach for representatives and volunteers in reporting suspected incidents of waste, fraud, abuse, and other questionable activities and practices, and/or violations of ethical codes.

SECTION III: WRITTEN PROCEDURES TO DEAL WITH ALLEGATIONS OF VIOLATION OF CODE OF ETHICS

Reporting Suspected Violations:

1. FCS believes that our integrity, ethics, and proper conduct are based on honesty and fairness. FCS representatives must report suspected violations promptly.
2. Representatives who report suspected violations of the Code in good faith, will neither be disciplined nor subject to any other retaliatory action; FCS maintains a “no reprisal” approach for representatives in reporting suspected incidents or questionable activities and practices within the Agency.
3. Any FCS representative, who knowingly fails or purposely delays a report, may be subject to disciplinary action relevant to agency role.
4. Representatives need not be absolutely certain that a violation has occurred before submitting a report; reasonable belief that a violation may have occurred is sufficient.
5. A report must be made regardless of the identity or position of the suspected offender.
6. All efforts will be made by FCS to protect the confidentiality of the person making the report.
7. Reports of possible violations of law or ethical standards are made to the supervisor or administrator, who, in turn, reports to the CEO or Designee. The representative may also choose to report directly to the CEO or designee.

Accurate and Prompt Reporting:

1. Accurate and prompt reporting of suspected violations enables FCS to investigate potential problems quickly and to take prompt action to resolve them.
2. All reports of suspected violations will be acted on promptly and the complainant will be notified of the result.
3. Representatives are encouraged to report any incident or suspected violation within ten (10) working days; reports will be still be accepted if they are submitted more than ten (10) working days after the occurrence.
4. Reports can be made verbally or on a confidential basis to:
CEO — Organization Compliance
Family and Children’s Services
1714 Eastman Avenue
Midland, Michigan 48640

Investigation of Suspected Violations:

1. Individuals will receive acknowledgment of receipt of the report.
2. The Leadership Team will investigate the report within (10) ten business days of receiving the report, and complete the investigation with a final report completed within (20) twenty

days.

3. The CEO will facilitate and approve the recommendations of the team, which may include training, supervision, and/or disciplinary action.
4. If one or more member(s) of the Leadership Team is named in the allegation, they will be recused from the investigation and may be replaced by the next most senior staff member(s).
5. The Agency will remove or reassign any individual(s) to other responsibilities who, in the opinion of the CEO or designee, may potentially affect an investigation by the presence of the individual(s) under investigation.

Acting on Violation:

If there is sufficient evidence, as determined by the investigation, a report and recommendation will be prepared by the members of the Leadership Team other than the CEO and submitted to the CEO. 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.

Documenting the Investigation:

1. All steps must be taken to protect the opportunity to view all related documents and records to the suspected violation. Documents and records must be protected from destruction or removal from the investigation site.
2. The Leadership Team will maintain a log of all Code of Ethics investigations.
3. In addition to maintaining a log, the Leadership Team will create a separate file for the investigation with the complaint and the final report.
4. All investigative activity will be reported to the Board of Directors with an analysis on Code of Ethics violation and/or trends and patterns.

Government Investigations:

1. FCS cooperates with any governmental investigation; since the agency must protect its interests and legal position in these matters, the agency will request assistance from corporate counsel in these matters.
2. All cooperation with governmental agencies will be conducted through the CEO or designee, in consultation with corporate counsel.
3. Representatives of services and programs are not authorized to engage external consultants, auditors, or legal counsel in connection with compliance matters without the advance approval of the CEO or designee.

Discipline for Violations:

1. All disciplinary actions of FCS representatives shall be done in accordance with the policy appropriate to the individual's status and role in the agency.
2. Disciplinary actions will be applied when:
 - a. An FCS representative authorized or participated in actions which violate the Code

- b. An FCS representative knowingly fails to report, purposely delays a report or refuses to cooperate in an investigation of a suspected violation;
 - c. Any agency supervisor who fails to detect violations by a staff person under their supervision or fails to report a violation of the Code if these actions reflect inadequate supervision or lack of oversight;
 - d. Any FCS representative who retaliates against an individual for a reporting a violation or possible violation of the Code:
3. Disciplinary action appropriate to the status and role of the representative could include dismissal from employment, removal of rights as a volunteer or board member, or voiding of a contract for services. All disciplinary actions will be reported to the Board of Directors.

Questions Regarding the Code:

The CEO or designee is responsible for implementation of the Code and organization compliance program. The CEO or designee will work with other FCS representatives, as necessary, in respect to implementation, training, and enforcement of the Code. Any FCS representative who has questions regarding the applicability or implementation of the Code should direct the question to the CEO or designee. Written correspondence related to the Code should be addressed to the CEO or designee and marked "CONFIDENTIAL."

Monitoring:

1. The Leadership Team shall ensure that the Code of Ethics is clearly communicated to staff on an ongoing basis. The methods of communication will be as follows:
 - a. Each new hire, whether full-time, part-time, or contractual, will receive a copy of the Code on their first day of employment.
 - b. Each new hire will sign off acknowledging receipt and understanding of FCS' Code.
2. 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.

SECTION IV: EDUCATION ON ETHICAL CODES OF CONDUCT FOR PERSONNEL AND OTHER STAKEHOLDERS

1. FCS supports 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.
2. Leadership supports and makes available online access to learning opportunities and reference materials for staff. Supervised access for other stakeholders and Agency collaborators will be granted by request; Agency subscribes to magazine and subscriptions related to relevant fields; agency collaborates with other organizations for in-service workshops and community meetings; and agency supports time off and financial

assistance for staff to attend conferences, when feasible.

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

SECTION V: ADVOCACY

1. FCS advocates for persons served, personnel, and other community stakeholders. FCS' advocacy efforts include conducting and participating in public education or activities that promote the elimination of discrimination and stigma for the persons served.
2. FCS personnel participate in a variety of public education efforts, community boards and committees, newspaper articles, and radio and television presentations.
3. FCS works in collaboration with other organizations to coordinate our advocacy efforts on behalf of not only persons served, but FCS' general geographic service area as well.
4. FCS 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.
5. The continuum of advocacy services will include from time to time, based upon the changing needs of persons served and the community, the following:
 - a. Linking persons served to local advocacy groups, agencies, and organizations
 - b. Personal Advocacy: One-on-one advocacy to secure the rights of the persons served.
 - c. Systems Advocacy: Seeking to change a policy or practice that affects the person served.
 - d. Legislative Advocacy as permitted by law: Seeking legislative enactments that would enhance the rights of and/or opportunities for the person served.
 - e. Legal Advocacy: Using the judicial and quasi-judicial systems to protect the rights of the person served.
 - f. Self-Advocacy: Enabling the person served to advocate on his/her own behalf.

SECTION VI: CORPORATE CITIZENSHIP

1. FCS encourages corporate responsibility at all levels of the organization. Corporate responsibility demonstrates what an organization 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 organization; and considering the impact of organizational activities on persons served, personnel, other stakeholders, and the environment.
2. 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. FCS provides reasonable accommodations to promote equal opportunities for participation throughout all levels of the organization.
3. FCS supports the involvement of staff in corporate responsibility activities as a way to

not only advance the mission, philosophy, values and goals of the organization, but to advocate for the needs, wants, and desires of persons served and the community.