

---

# STAR CENTER CODE OF ETHICS

## A. Professional Responsibility

During my employment at the STAR Center, I will be knowledgeable of and abide by the STAR Center philosophies, making every effort to consistently act in accordance with it.

I will adhere to the Policies and Procedures established by the STAR Center.

I will not discriminate against or refuse professional services to anyone on the basis of race, color, creed, age, sex, sexual orientation, religion, national origin, ability and nature or degree of disability.

I will not, in any fashion or manner, make suggestive remarks or sexual advances toward any staff, client, parent or guardian, other professional, or community members.

I will have a continuing commitment to assess my own personal and professional strengths, limitations, and effectiveness. I will request support and seek additional training, as needed.

I will conduct myself in a professional manner that reflects favorably upon myself and the STAR Center and avoid any action that could discredit myself or the STAR Center.

While an employee at the STAR Center, I acknowledge that all documents and information including plans, projects, clients and services lists are and shall remain the exclusive property of the STAR Center. In the event that my employment terminates, this information will not be used for my personal gain or benefit.

When acting as a representative of the STAR Center, I agree, to the best of my ability, to accurately represent the Center's policies and position on issues.

I will uphold all applicable laws and regulations governing the STAR Center. Employees are expected to provide truthful and comprehensive information in response to a legitimate inquiry by any appropriate official, regardless of whether that inquiry is an informal question or a formal investigation.

## B. Service Delivery

In order to ensure that all services are client-driven, I will, to the best of my ability, present all options to clients in order to enable them to access necessary resources.

I will assist clients in obtaining other services in addition to those provided by the STAR Center and me, when applicable.

---

If I am unable to provide services requested by a client or client representative, I will assist the client in accessing the services requested (i.e. referral for assistance to other staff or other appropriate agency).

I will accept the responsibility to advocate for the clients and protect the community in which they live against unethical and damaging practices by individuals or organizations.

I will not give or except substantial gifts, money, or gratuities from a client, visitor, or any other stakeholder from the STAR Center.

I will not distribute literature or printed materials of any kind, sell merchandise, solicit financial contributions, or solicit for any other cause during work time. The only exception to this is the STAR Center-sponsored solicitations.

I will respect and safeguard the personal property of clients, visitors, fellow employees and all STAR Center property.

I will not assume the legal role of guardian, conservator, personal payee, power of attorney or legal representative for clients in witnessing documents.

I will not engage in romantic relationships with supervisors or supervisees and/or where a power differential exists (i.e. evaluative capacity or supervision).

## C. Confidentiality

I will respect the privacy of clients and hold in confidence all information obtained in the course of my interactions with the clients. Therefore, I will not discuss client confidences with anyone except: (1) with staff for the purpose of peer consultation, client services, or other client related need to know relationships, (2) as mandated by law; (3) to prevent a clear and immediate danger to the person or persons; and (4) where I am a defendant in a civil, criminal or disciplinary action arising from the relationship (as directed by STAR Center Leadership and/or Legal Counsel).

I will reveal only pertinent information by personal permission from the client via a waiver that must be reconfirmed and dated at the time of each request for such information. This may be by phone or by person, to be immediately followed by written consent.

I will be responsible for storing and updating client records and files in ways to maintain confidentiality.

I will possess a professional attitude that upholds confidentiality towards the clients, family members, and colleagues.

I, upon termination of employment from the STAR Center, will maintain all confidences gained while an employee at the STAR Center.

---

I will uphold the confidentiality of all STAR Center activities or actions that are legal and ethical standards.

## D. Conducting Business

Under the leadership of the Board of Directors, the president, and management staff, all employees are charged to exercise the utmost good faith in all dealings, carrying out duties with loyalty and fidelity to the STAR Center, and governing the Center's affairs honestly, exercising the best care, skill, and judgment for the benefit of the Center. These powers are exercised toward the goal of developing and maintaining the trust and confidence of the general public, donors, and recipients of our services. The president acts to ensure that contributions and other revenue are used wisely and in compliance with the intent of the donor.

It is the policy of the STAR Center to make sound business decisions in the continued commitment to the mission of the Center. A sample of the tools used by the Board of Directors and/or management staff to help guide decisions are; Annual budgets, Financial forecasting, Financial statements, Outside financial audits, Long Range Planning, Outcomes Management Plan, Community Involvement, and Input from persons served and other stakeholders.

## E. Marketing

It is the policy of the Board of Directors and leadership of The STAR Center to always strictly comply with the highest ethical standards and honesty in its presentation of the Center in all business ventures and to the community at large. This includes avoiding the exploitation of clients in the marketing of the Center and honest representation of the services provided by The STAR Center through all means of presentation.

## F. HIPAA AND HITECH

I will not release personal information to third parties unless we have received specific authorization to do so by individuals whose information is contained in the data.

I will keep assigned systems secure and take reasonable measures to protect them from theft and damage if any equipment is taken offsite or used in the field.

I understand, as an employee of the STAR Center I may be held financially accountable and legally liable for data breaches, loss, or corruption and downtime associated with noncompliance to any part of this policy.

I will abide by the STAR Center's policies in regards to the use of information technology systems.

"Systems" includes but is not limited to: desktop, laptop and slate or net book computers, servers and network devices, wired and wireless phones, PDAs, cell phones, removable media such as USB sticks, jump/flash drives, external hard drives, computer peripherals such as

---

printers, scanners, wireless modem cards, fax machines, multi-function scanner/fax/printer/copier devices, monitors, plasma screens, and projectors.

I will not use the STAR Center's resources or communication systems in any manner that:

- Involves excessive or inappropriate personal use or trade secrets
- Includes libelous, defamatory, offensive, racist, harassing, or obscene remarks or graphics
- Creates risk for data interception, loss, theft, breach, or corruption
- Provides access or use by former employees, competitors, or any other unauthorized user
- Destroys documents that must be kept for periods specified by law or if the legal department has requested their preservation
- Violates federal, state, or local laws including use while driving

I will abide by data protection laws and regulations, including those pursuant to HIPAA and HITECH,

I will contact the President of the STAR Center before establishing any new program or initiative that will require the collection or processing of PHI.

## G. Human Resources

Appropriate screening of applicants takes place in order to protect the STAR Center and the clients receiving services. These may include (dependent upon position) reference checks, verification of credentials, background check, and drug screening.

Confidentiality of staff will be protected and personnel records are kept in a confidential area and access is strictly limited to appropriate personnel.

Violation of this Code of Ethics will be reported to the PRESIDENT who is responsible for ensuring that his/her subordinates understand and comply with this policy. The PRESIDENT will take the action he/she deems necessary to correct the problem and bring the violator's behavior into compliance with these guidelines.

Should the president be in violation of this policy, the violation will be reported to the President of the Board of Directors who shall consult with the Executive Committee of the Board to resolve the violation. If necessary, this matter will be brought before the full Board of Directors for resolution.

## H. Prohibition of Waste, Fraud, Abuse, and Other Wrongdoing

---

It is the policy of the Board of Directors and leadership of the STAR Center to cooperate with all state and federal agencies in the investigation of fraud and abuse. We are required to be familiar with the Fraud and Abuse Section 2-9.14 of the TennCare *Select* Agreement. Reportable fraud and abuse includes suspected fraud and abuse in the administration of the TennCare program, Provider fraud and abuse, and Member fraud and abuse. Any suspected fraud and abuse will be reported to the Tennessee Bureau of Investigation Medicaid Fraud Control Unit and the Office of Inspector General.

I will not present to an officer or employee of the United States Government or a member of the Armed Forces of the United States a false or fraudulent claim for payment or approval on behalf of the STAR Center.

I will not make or use a false record or statement to get a false or fraudulent claim paid or approved by the Government on behalf of the STAR Center.

I will not conspire to defraud the Government by getting a false or fraudulent claim allowed or paid on behalf of the STAR Center.

I will not make or deliver a document certifying receipt or property used, or to be used, by the Government or make or deliver the receipt without completely knowing that the information on the receipt is true.

I will not buy or receive as a pledge an obligation or debt, public property from an officer or employee of the Government, or a member of the Armed Forces, who lawfully may not sell or pledge the property.

I will not make or use a false record or statement to conceal, avoid, or decrease an obligation to pay or transmit money or property to the Government.

## I. Use of Social Media

STAR Center employees are expected to make responsible decisions in regards to the use of social media. Inappropriate postings that may include discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may subject you to disciplinary action up to and including termination.

I will not utilize social media to post work-related complaints or criticism, use statements, photographs, video or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating.

I will be honest and accurate when posting information or news pertaining to the STAR Center.

I will not post any information or rumors that I know to be false about the STAR Center or anyone affiliated with the STAR Center.

I will not post internal reports, policies, procedures or other internal business-related confidential communications.

---

I will not create a link from a blog, website or other social networking site to the STAR Center's website without identifying myself as a STAR Center employee.

I will not represent myself as a spokesperson for the STAR Center. If the STAR Center is a subject of the content I am creating, I will be clear and open about the fact that I am an employee and that my views do not represent those of the STAR Center, or anyone affiliated with the STAR Center.

I will not use the STAR Center's email addresses to register on social networks, blogs or other online tools utilized for personal use.

## J. Contractual Relationships

It is the policy of the Board of Directors and leadership of the STAR Center to ensure appropriate approval is obtained prior to binding the STAR Center through a contractual relationship.

The STAR Center is governed by a volunteer Board of Directors. The Board is represented by the President who is charged to carry out the administration of the organization, its programs and services.

The President is identified by the Board of Directors as the authorized signer of contracts and other documents on behalf of the STAR Center. In the absence of the President, authority is given to the executive committee when the time is of the essence and the President is not available.

Board approval must be obtained prior to binding the organization through a contractual relationship that involves:

- The purchase, sale or transfer of real property
- New term bank loans and lines of credit
- Changes to existing bank loans and lines of credit (annual renewal does not need Board approval unless terms have changed from the original contract)
- The purchase or lease of equipment over the amount of \$10,000 unless the purchase is being made with grant money which has been received and designated for such purchase
- Contracts for services which exceed \$10,000 annually, including maintenance contracts

All checks written on behalf of the STAR Center require the signatures of two executive staff members.

---

## K. Conflicts of Interest

I will avoid any conflict, direct or indirect, between myself, as an individual, my professional or business interests and the interests of the STAR Center or its clients.

I will not seek or take advantage of anything of more than nominal value that would not normally be available to an employee or volunteer if it's not in conformity with the STAR Center policy,.

I will not use or provide property, records, services, name, emblem, or endorsement of the STAR Center affiliation as an employee or volunteer except in conformity with the STAR Center policy.

I will not use my affiliation or that of any other STAR Center employee or volunteer in connection with personal associations with partisan politics, denominationally religious matters or positions on issues that are not in conformity with the STAR Center policy.

I will not use confidential or proprietary information obtained through the STAR Center for personal gain.

I will not make or approve the use of STAR Center funds for the support of political parties or candidates.

I am responsible for taking initiative to explore the potential conflict to the point of clarity if I have questions about potential conflict of interest.

I have read and understand the STAR Center's Code of Ethics and agree to adhere to this Code of Ethics.

**Employee's Name (Printed)** \_\_\_\_\_

\_\_\_\_\_  
**Employee's Signature**

\_\_\_\_\_  
**Date**