

**JEWISH FAMILY SERVICES**  
**Corporate Compliance Handbook**

**CODE OF ETHICS**

**Statement of Philosophy**

JFS has a public responsibility to provide high quality services to the community it serves. The Organization is based on the premise of promoting the dignity and individual rights of every person served. A JFS employee must fulfill all the responsibilities of their job classification in accordance with Federal, State, and local laws, licensing or registration regulations, professional standards, as well as Agency policy, and guidelines. Agency expects its employees, its volunteers, students, or anyone who has a formal relationship with the Agency, to adhere to the highest professional and business standards. The following statement of principles establishes the foundation upon which our work rules are based.

**Business Code of Ethics**

JFS employees are expected at all times to reflect the highest business or professional standards in their conduct. JFS staff members abide by the National Association of Social Workers Code of Ethics. These principles include service to clients, social justice, dignity and worth of the person, importance of human relationships, integrity and competence. The complete NASW Code of Ethics is always available to employees for further detail.

**Marketing Code of Ethics**

Marketing practices are in accordance with Agency business standards. They reflect the core values of honesty and integrity. All printed material and advertisements are representative of services offered and include no false statements or misleading information.

**Contractual Relationships Policies**

Jewish Family Service requires a signed Business Associate Agreement for all Independent Contractors and third parties in which business is conducted.

The rules regarding the agency Corporate Responsibility Program apply to all of these parties.

**Use of Social Media Policy**

“Social media” includes all means of communicating or posting information or content of any sort on the Internet, including to your own or someone else’s web log or blog, journal or diary, personal web site, social networking or affinity web site, web bulletin board or a chat room, whether or not associated or affiliated with JFS.

You are more likely to resolve work related complaints by speaking directly with your co-workers or by utilizing our problem solving procedure than by posting complaints to a social media outlet. Nevertheless, if you decide to post complaints or criticism, avoid using statements, photographs, video or audio that reasonably could be viewed as maliciously false, obscene, threatening or intimidating, that defames clients, competitors, vendors or staff members or that might constitute harassment or bullying. Examples of such conduct might include posts meant to put someone in fear for their physical safety or psychological well-being; posts designed to cast someone in a false light to the public; posts that invade a person’s reasonable expectation of privacy; or posts that

could contribute to a hostile work environment on the basis of race, age, gender, national origin, color, disability, religion or other status protected by federal, state or local law.

Make sure you are always truthful and accurate when posting information or news. If you make a mistake, correct it quickly. Be open about any previous posts you have altered. Use privacy settings when appropriate. Remember that the Internet archives almost everything; therefore, even deleted postings can be searched. The Internet is immediate; nothing that is posted ever truly "expires." Never post any information or rumors that you know to be false about JFS, fellow staff members, clients, and people working on behalf of JFS or competitors.

Do not create a link from your blog, website or other social networking site to JFS' website without identifying yourself as JFS staff member. Express only your personal opinions. Never represent yourself as a spokesperson for JFS or make knowingly false representations about your credentials or your work. If JFS is a subject of the content you are creating, be clear and open about the fact that you are a staff member and make it clear that your views do not represent those of JFS. It is best to include a statement such as "The postings on this site are my own and do not necessarily reflect the views of JFS." You must refrain from using social media while on working time.

Staff members are encouraged to report violations of this policy. JFS prohibits retaliation against any staff member for reporting a possible deviation from this policy or for cooperating in an investigation.

Where applicable, JFS complies with state laws concerning access to a staff member's personal social networking account, including restrictions concerning employer requests for a staff member's username and/or password.

Nothing in this policy is designed to limit a staff member's right under Section 7 of the National Labor Relations Act, including discussing wages or other terms of employment.

### **Service Delivery Code of Ethics**

- **Conflict of Interest**

The agency will make every effort to avoid involvement in conflict of interest situations at all levels of the Agency.

1. Voluntary board members receive no honoraria for services.
2. It is the policy of Jewish Family Services that the governing body, staff or consultants are not to be favored in applying for or receiving services from the agency.
3. It is the agency's policy that no member of the board, staff or consultants shall receive payment or other consideration from another provider of services for the referral of any applicant or client to such provider of services.
4. Board, staff or consultants shall not provide payment or other consideration to any service provider of other organization or individual for any referral of any applicant for agency's services.
5. It is the agency's policy to prohibit the directed referral (steering) of its applicants, clients and their families to any private practice in which its staff or consultants may be engaged.
6. Referrals may be made to mental health practitioners, physicians or other community resources where the agency cannot provide the necessary service. There shall be administrative controls over such referrals.

7. Staff and consultants of the agency are to have no direct or indirect financial interest in the assets, leases and business transactions or services of the agency.
8. Members of the Board of Jewish Family Services shall have no direct or indirect financial interest in the assets or leases of the agency. Any member who, individually or as part of a business or professional firm, is involved in the business transactions or current professional services of the agency (except as a client), shall disclose this relationship and shall not participate in any vote taken in respect to such transactions or services.

- **Acceptance of Gifts, Money or Gratuities from Clients**

Because of the nature of the services that we provide and our obligation to protect our clients from undue influence, Jewish Family Services employees have a special obligation to refrain from accepting gifts, including but not limited to, monetary gifts in any form, gratuities, bequests, transfers, conveyances, or goods/benefits of more than nominal value (collectively "gifts") from the Agency's clients, former clients, family members of clients, or anyone acting on behalf of a client or former client (collectively "clients"). For purposes of this policy, "nominal value" means a gift or benefit of less than \$50.00 in value.

No JFS employee shall solicit, accept, receive, or retain for themselves or for a third party (other than the Agency itself as discussed below) any gift, money or gratuities of more than nominal value from a client. An employee may not be a beneficiary of a client's will or accept conveyances from a trust, except that personal property of nominal value may be accepted after full prior disclosure and with specific written permission of the Executive Director. In the event that the Executive Director is the recipient of a gift, she must disclose this to the Board president.

An employee offered or notified of a gift must decline to accept the gift. In circumstances where such a gift is offered, the employee should politely decline the gift explaining that it is against Agency policy for the employee to accept the gift. The employee must inform the supervisor of the offered gift and appropriately document all communications related to the gift and the outcome of such incidents. If an employee believes that there may be a therapeutic value associated with accepting a gift from a client, the employee must discuss the treatment-related issues with her supervisor and develop an appropriate plan for responding to the offered gift and appropriately document all communications related to the gift and the outcome of any such incidents.

**Exceptions to this policy include:**

(1) Acceptance of gifts of reasonable value (under \$50.00) that are related to commonly recognized events or occasions, such as a wedding, retirement, or bar or bat mitzvah. Limited to \$100 per calendar year.

(2) Gifts approved by the Executive Director in writing on a case-by-case basis, not identified above. Request and approval must be made in writing including all relevant facts.

On occasion, clients may wish to make a gift or donation to the Agency. An employee who becomes aware of a client's desire to make such a donation or gift must notify their Supervisor and the Development Director promptly. With their assistance the employee may work with a client regarding planned giving to the Agency.

Any employee who has any questions about the acceptance of a gift is strongly encouraged to discuss the issue with their direct supervisor, the Executive Director or the Corporate Compliance Officer.

Any employee who violates this policy by accepting a gift will be subject to disciplinary action, which may include immediate discharge. Any employee who is aware of a potential or actual violation of this policy must report the situation immediately to the employee's supervisor or to the Corporate Compliance Officer. Failure to report violations or potential violations may result in progressive discipline up to and including immediate termination.

- **Acceptance of Gifts, Money or Gratuities from Vendors**

No JFS employee shall solicit, accept, receive, or retain for themselves or for a third party (other than the Agency itself as discussed below) any gift, money, or gratuities of more than nominal value from a vendor.

An employee offered or notified of a gift must decline to accept the gift. In circumstances where such a gift is offered, the employee should politely decline the gift explaining that it is against Agency policy for the employee to accept the gift. The employee must inform the supervisor of the offered gift and appropriately document all communications related to the gift and the outcome of such incidents.

**Exceptions to this policy include:**

Acceptance of gifts of reasonable value (under \$50.00) that are related to commonly recognized holidays or appreciation of services rendered to Jewish Family Services staff (e.g. Winter Holiday and New Year Wishes candy, baked goods, etc)

(1) Gifts approved by the Executive Director in writing on a case-by-case basis, not identified above. Request and approval must be made in writing including all relevant facts.

Any employee who has any questions about the acceptance of a gift is strongly encouraged to discuss the issue with the supervisor or the Corporate Compliance Officer.

Any employee who violates this policy by accepting a gift will be subject to disciplinary action, which may include immediate discharge. Any employee who is aware of a potential or actual violation of this policy must report the situation immediately to the employee's supervisor or to the Corporate Compliance Officer. Failure to report violations or potential violations may result in progressive discipline up to and including immediate termination.

- **Personal Fundraising**

Working time is for work. For this reason, employees are not allowed to:

1. Solicit on behalf of any organization or for any purpose during their working time or the working time of the solicited employee.
2. Personally distribute written material on behalf of any organization or for any purpose at any time in working areas and during working time in non-working areas. However, employees are permitted to leave written material in a non-working area (e.g. staff kitchen).
3. Work time does not include lunch, breaks, or before or after work hours.

We appreciate employee's reflecting their civic responsibility by being involved on behalf of worthwhile causes or organizations. We encourage employee's activity on their behalf during their lunch or break periods, or before and after working hours. These activities include selling Girl Scout cookies, raffle tickets, etc.

Persons not employed by JFS are prohibited from soliciting for or distributing written material on behalf of any organization or for any purpose on JFS property, unless prior approval is obtained from management. No form of official agency communication can be utilized for purposes of personal fundraising (e.g. total staff email, staff newsletter, etc).

- **Personal Property**

JFS goes to great lengths to safeguard the personal property of the persons served, visitors, and personnel as well as the property owned by JFS.

- **Personal Belongings of Employees**

JFS provides the necessary tools for employees to be successful. The agency does its very best to provide the tools that meets the employee's desires as well. Occasionally, JFS is unable to meet the aesthetic desires of an employee. Employees are permitted to bring in personal belongings (e.g. lamps, office decorations, etc) within reason. In order to maintain the office decorum, employees must get permission from the HR Director prior to securing anything to the walls. JFS management reserves the right to ask an employee to remove a personal belonging (s) if it is determined to interfere with the work atmosphere or if it determined to be unsafe. JFS employees are responsible for removing all personal property should their office location move, or in the event that they are no longer working at the agency.

- **Setting Boundaries**

A supervisor may not hire or supervise an individual if that individual and the supervisor have an on-going romantic relationship, including but not limited to, marriage, or if that individual is a member of the supervisor's immediate family. The term "immediate family" refers to parents, children, sisters, brothers, nieces, nephews or other family members residing in the same household. In the case of marriage of persons within the same department, an effort will be made to assign comparable job duties so as to minimize problems of supervision, safety, security and morale. On occasion, the Agency may employ more than one member of a family. Related people will not be involved in evaluating each other's job performance or in making recommendations for salary adjustments.

- **Witnessing of Legal Documents**

When requested, employees in accordance with their job description may be requested to witness documents. These may include powers of attorney, guardianship, and advance directives. No employee will be forced to witness any documents if they are not comfortable doing so.

### **Professional Code of Ethics**

Professional ethics require, among other things, the observance of confidentiality regarding any and all client information, the avoidance of sexual misconduct, substance abuse, or client mistreatment of any kind. Staff protects the interests of the clients, who receive services through various programs of the Agency. Staff respects the attitudes and rights of clients, their families, staff, and other stakeholders. Staff exemplifies the highest standards of personal integrity in relations with clients and their families, staff and public.

### **Human Resources Code of Ethics**

The Human Resources area of the Agency adheres to the highest standards of ethical and professional behavior. A JFS employee must fulfill all the responsibilities of their job classification in accordance with Federal, State, and local laws, licensing or registration regulations, professional standards, as well as Agency policy, and guidelines. Standards of conduct for employees and services provided by employees shall be in accordance with accepted professional ethics and standards as practiced in this community. The Agency staff members strive to achieve the highest levels of service, performance and social responsibility. Staff is the most valued resource, and must recognize the importance of representing the Agency in a positive manner and conduct themselves accordingly in all interactions.

**CORPORATE COMPLIANCE PROGRAM, ENFORCEMENT,  
AND DISCIPLINARY GUIDELINES**

The Agency follows an effective corporate compliance program as well as complies with the related federal sentencing guidelines, which mandate that an “effective” compliance program include procedures to ensure the discipline of employees “responsible for failure to detect” wrongdoing as well as for those who commit an offense or crime. See Policy #1-3-5 for details.

The Agency will train all employees on the quality compliance program and the importance of adherence to the program. JFS will require employees to acknowledge that adherence to the program is a condition of employment. The training will inform employees about the consequences of failing to comply with the compliance program.

The Agency has a policy of progressive discipline for conduct that violates the corporate compliance program, except where immediate termination is identified as the appropriate discipline. The JFS will consider whether the employee’s conduct constituted simple negligence, gross negligence, or willfulness, in determining and administering discipline.

The following list of employee infractions and violations apply to the Agency’s compliance program. They are a supplement to existing employee duties. Consistent with the federal sentencing guidelines, the Agency will treat the listed infractions as follows:

**Employee Action and Discipline**

1. Negligently providing incorrect information to the Agency or a government agency, consumer, insurer or the like.

First Offense:	Written warning
Second Offense:	Three day suspension without pay
Third Offense:	Termination of Employment

2. Willfully providing false information to the Agency or a government agency, customer, insurer or the like.

First Offense:	Termination
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3. Violation of any state or federal criminal statute.

First Offense:	Termination
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4. Failure to report conduct by an employee of the Agency, which a reasonable person should know, is criminal.

First Offense:	Termination
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5. Failure to report another employee’s violations of any duties under this compliance program or reporting false or misleading information.

First Offense:	Written warning
Second Offense:	Three day suspension with out pay
Third Offense:	Termination of Employment

6. Intentional misuse of the compliance hotline by knowingly and willfully providing false or intentionally incomplete information to the Corporate Compliance Officer.

First Offense: Termination

7. Failure to detect conduct by an employee of the Agency, which a reasonable person should know is criminal and reasonably could be expected to detect.

First Offense: Written warning  
Second Offense: Three day suspension without pay  
Third Offense: Termination of Employment

8. Failure to take action as prescribed under the Agency compliance program or to comply with any duties, express or implied, set forth in the program.

First Offense: Written warning  
Second Offense: Three day suspension without pay  
Third Offense: Termination of Employment

9. Engaging in any conduct prohibited in the employee handbook or which is considered unbecoming to an Agency employee.

First Offense: Written warning  
Second Offense: Three day suspension without pay  
Third Offense: Termination of Employment

An employee, who has violated a provision of the corporate compliance program that would otherwise require termination, may, nevertheless, be subject to a lesser punishment. Whether the employee is terminated will be influenced by (a) whether the employee promptly reported his own violation, (b) whether the report constitutes the Agency's first awareness of the violation and the employee's involvement, and (c) whether the employee cooperates fully in investigation and/or correcting the violation. Whether the Agency imposes a punishment less stringent than termination is in the sole discretion of the Agency.

### **Violations/No Reprisal**

Violations regarding ethical standards and behavior are considered extremely serious matters. It is the policy of Jewish Family Services to investigate all alleged violations of JFS Core Values, Code of Ethics and the Corporate Compliance Policy which may include waste, fraud, abuse and other wrongdoing. If the investigation determines that a violation occurred, appropriate corrective action will be taken. JFS prohibits retaliation or retribution against an employee reporting any violation.

### **Procedure Regarding Violations:**

Ethics and compliance issues can be complex, and reporting a suspected violation is not always easy. To assist with these difficult issues, we have developed a framework for decision-making:

- Discuss the issue with your immediate supervisor. If you are not comfortable discussing the issue with your supervisor, go to the next level.
- Discuss the issue with a higher-level manager. If you are not comfortable taking this step, go to the next level of supervision.

If none of the above steps resolve your issue or concern, contact our Corporate Compliance Officer, Elina Zilberberg by calling her 734-769-0209, ext.352 or email her at [elina@jfsannarbor.org](mailto:elina@jfsannarbor.org) to seek assistance. One may contact the Corporate Compliance Officer with questions concerning

ethical or legal conduct or to report potentially improper action. Any employee, volunteer or interested party may report any alleged violation of our Core Values, Code of Ethics or the Corporate Compliance Policy to the Corporate Compliance Officer. Reports are confidential and all reasonable questions and concerns are addressed. No employee, volunteer or interested party will be retaliated against by the Agency for reporting what they reasonably believe to be a violation.

In case of violation the CCO will:

- investigate within seven (7) days and respond to and resolve a complaint within 30 days of the receipt of the complaint and
- issue a report that will include findings and, if indicated, corrective action and resolution.
- The CCO will either personally conduct the investigation or delegate the investigation to a more appropriate JFS staff member. The CCO will request assistance in the investigation from the reporter, other personnel or external sources, as appropriate (all aspects of the investigation will remain under the active oversight of the CCO or JFS Executive Director, as appropriate)
- ensure that appropriate education and training is provided to employees, as necessary, to minimize the risk of the same compliance violations recurring;
- follow up the corrective action/resolution to assure compliance;
- record follow up and assign closing date; and
- monitor compliance after an appropriate amount of time has elapsed to assure effectiveness of the original corrective action.

The JFS Corporate Compliance Officer or designee will also develop a corrective action plan that is submitted to the JFS Executive Director and that includes, but is not necessarily limited to the entire investigation response, resolution and follow-up as in Standard D. with special emphasis placed on remedial systemic action designed to ensure that the same or similar issues do not recur and recommendations for any relevant changes in the JFS Corporate Compliance Plan or in JFS policies.

At least annually and more often if indicated, the JFS Executive Director or designee will lead a review of the effectiveness of the JFS Corporate Compliance Plan and report the results, compliance related activity, including all reports of violations/suspected violations, and related investigations, remediation and plan revisions to the JFS Board of Directors.

### **Education and Training of Staff, Board Members and Clients**

An essential part of the Compliance Program is to ensure that staff members and other stakeholders are familiar with its provisions, including the reporting procedures for violations. To this end, JFS regularly communicates its Compliance Program standards and related policies to staff members through the implementation of various training initiatives. Training methodologies may include on-the-job supervision, classroom (in-person) instruction, training at staff meetings, electronic communication of compliance alerts, and announcements via e-mail.

### **Advocacy Efforts on behalf of the Clients**

Refer to Case Management/Service Coordination Policy # 2-2-1 for full description.

### **Corporate Citizenship**

- JFS manages its funds responsibly and prudently

- JFS spends a reasonable percentage of its annual budget on programs in pursuance of its mission
- JFS spends an adequate amount on administrative expenses to ensure effective accounting systems, internal controls, competent staff, and other expenditures critical to professional management
- JFS compensates staff, and any others who may receive compensation, reasonably and appropriately
- JFS does not accumulate operating funds excessively
- JFS prudently draws from endowment funds consistent with donor intent and to support the public purpose of the organization
- JFS' spending practices and policies are fair, reasonable and appropriate to fulfill the mission of the organization
- All financial reports are factually accurate and complete in all material respects.