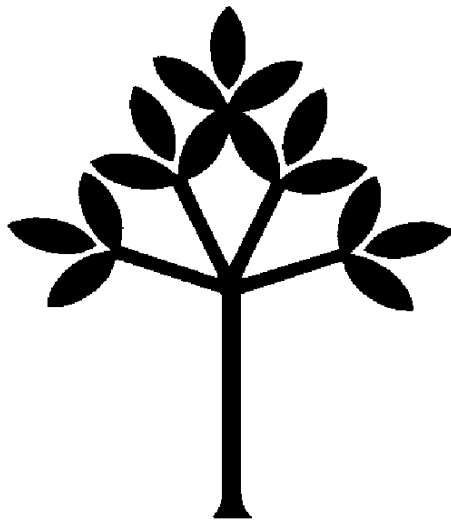


*San Diego-Imperial Counties
Developmental Services, Inc.*

Code of Conduct and Standards



August 2010

SAN DIEGO-IMPERIAL COUNTIES DEVELOPMENTAL SERVICES, INC.
STRATEGIC PLAN

VISION STATEMENT

Persons with developmental disabilities will live productive and satisfying lives as valued members of their communities.

MISSION STATEMENT

To serve and empower persons with developmental disabilities and their families to achieve their goals with community partners.

VALUES

- The uniqueness of human life is valued.
- Consumer and family choice is respected.
- Services reflect, and are sensitive to, the cultural and ethnic diversity of the community.
- Outreach and collaboration with the community are valued in identifying and addressing needs, and developing and nurturing new ideas and services.
- High quality services engender a sense of confidence and support within the community.
- Individuals, communities and government entities are well informed about (issues and services affecting) persons with developmental disabilities.

MESSAGE FROM THE EXECUTIVE DIRECTOR

We are pleased to present your personal copy of the San Diego-Imperial Counties Developmental Services, Inc. Corporate Compliance Program and Code of Conduct and Standards Handbook. The Corporation is committed to providing the highest quality of services to people with developmental disabilities and their families, in full compliance with state and federal statutes and applicable regulations. It is also committed to creating an environment where Corporate employees, in all disciplines and at all levels, provide services and conduct business within the highest standards of professional ethics and integrity.

The purpose of the Corporate Compliance Program is to provide employees of the Corporation with clear guidelines and expectations on how we are to treat people we encounter in conducting the business of the Corporation. These people include Corporate staff, our consumers and their families, service providers, state and local government employees, contractors, merchants, and many others. The Corporate Compliance Program reinforces the importance of conducting the business of the Corporation in compliance with laws, regulations, and the Corporation's vision, mission, values, goals, and policies.

Embrace these concepts and incorporate them into your daily work and professional activities. The Director of Human Resources has been designated as the Corporate Compliance Officer and is available to assist you by answering questions about this handbook. You may contact the Corporate Compliance Officer by electronic mail, telephone, or visit him in person to discuss any issues you may have.

Thank you for doing your part in creating an agency for which we can all be proud.

Carlos Flores
Executive Director
San Diego-Imperial Counties Developmental Services, Inc.

I. THE SAN DIEGO-IMPERIAL COUNTIES DEVELOPMENTAL SERVICES, INC. (SDICDSI) COMPLIANCE PROGRAM

The SDICDSI has instituted a Corporate Compliance Program designed to promote high standards as employees of the Corporation perform their duties and provide services in San Diego and Imperial counties. The Corporation acknowledges its responsibility to conduct business in compliance with applicable laws and regulations and the Compliance Program provides methods to prevent fraud and criminal and unethical conduct. As an important part of the Compliance Program, the Corporation has established a Code of Conduct and Standards for conducting its business. The Code of Conduct and Standards is contained in Section VII of this handbook.

II. SDICDSI COMPLIANCE PROGRAM SCOPE AND RESPONSIBLE PARTIES

The Corporate Compliance Program has been adopted by the Board of Directors of the Corporation and applies to all employees and volunteers. The Compliance Program also provides that entities doing business with the Corporation are aware that all Corporate personnel are expected to comply with applicable legal and ethical standards.

III. PURPOSE OF THE SDICDSI COMPLIANCE PROGRAM

The purpose of the Compliance Program is to create a Corporate environment of mutual respect among employees, respect for the people we serve and for the laws, rules, and regulations under which we operate. In addition, the Corporate Compliance Program seeks to:

1. maintain and enhance quality of service;
2. demonstrate a sincere effort to comply with all applicable laws and regulations;
3. enhance communications with contracting agents to assist them to maintain compliance with government and other contracts;
4. revise and clarify, as necessary, policies and procedures to enhance compliance with laws and regulations and with the Corporation's Code of Conduct and Standards;
5. instill in all employees of the Corporation their responsibility to comply with applicable laws and regulations and with the Corporation's Code of Conduct and Standards;
6. empower all responsible parties to prevent, detect, respond to, report, and resolve conduct that does not conform with laws and regulations and with the Corporation's Code of Conduct and Standards; and,
7. establish mechanisms for employees to raise questions and concerns about compliance issues and ensure that those concerns are appropriately addressed.

IV. CORPORATE COMPLIANCE PROGRAM IMPLEMENTATION

The components of the Corporate Compliance Program include Employee Training, Monitoring and Auditing, Enforcement and Discipline, and Response and Prevention.

Employee Training

The Corporation will take steps to effectively communicate its Compliance Program to employees by requiring participation in training programs or by disseminating publications that explain what is required.

Monitoring and Auditing

The Corporation will take steps to achieve compliance with its standards by implementing monitoring and auditing systems to enhance detection of criminal or unethical conduct by its employees or other agents and by creating a system whereby employees and other agents can report criminal or unethical conduct without fear of retribution.

Enforcement and Discipline

The Corporation's standards will be enforced through existing disciplinary mechanisms. The type of discipline used will depend upon the nature and seriousness of the infraction.

Response and Prevention

After an infraction has been detected, the Corporation will take necessary steps to respond and to prevent similar infractions. This may include modifications to the Corporate Compliance Program to prevent and detect violations of the law or unethical practices.

V. CODE OF ETHICS AND PRINCIPLES

The following Code of Ethics and Principles applies to all Corporate employees and volunteers:

1. All Corporate personnel shall treat consumers and their families and other Corporate personnel and volunteers without discrimination and with respect, dignity, and professionalism without regard to age, race, gender, religion, national origin, physical or mental disability, ancestry, marital status, sexual orientation, citizenship, or ability to speak English.
2. All Corporate personnel are expected to adhere to all applicable standards of professional practice and ethical behavior in carrying out the business of the Corporation and should not feel compelled to participate in unethical, improper, or illegal conduct.
3. All Corporate personnel should report their concern to their immediate supervisor if they believe that criminal or unethical conduct has occurred.
4. There will be no retaliation against personnel who, in good faith, report suspected noncompliance or raise concerns about compliance issues.

VI. HOW CAN YOU ADDRESS ISSUES?

The SDICDSI is involved in many and diverse activities, has many components, and has relationships with many different outside organizations. Each component of the Corporate organization involves different and ever changing laws, rules, and regulations governing our services, practices, and business relationships. Employees should focus on those areas that affect them directly and be aware of the laws, rules, and regulations that apply to their profession and/or work responsibility.

If you are in doubt about conduct, laws, rules, or regulations, you should ask the following questions: “Is this legal?” “Is it in keeping with the Corporation’s policies, values, vision or mission?” “Would you want to read about it in the newspapers?” “Would you want this done to you?” In asking questions, employees should follow their normal reporting procedures and protocols. Ask your supervisor. It is better to raise a question than to do something improper or illegal. If an employee is not comfortable asking their immediate supervisor, she or he should go to the next higher level. It is SDICDSI policy that no employee is penalized for asking a question regarding compliance or for raising an issue or concern.

VII. *SDICDSI CODE OF CONDUCT AND STANDARDS*

The following 12 topics represent agency priorities. Standards and policies have been established for each.

1. *Quality of Services*

Standard: SDICDSI will provide quality services in a manner that reflects the uniqueness of human life, consumer and family choice, and cultural and ethnic diversity.

- Policy:
- a. To assure that all persons with developmental disabilities in the catchment area have access to services based on individual and family needs and preferences.
 - b. To protect each individual’s rights through advocacy.
 - c. To ensure that the Corporation’s leadership addresses systemic changes mandated by state-level agencies and responds to changes in state of the art practices.
 - d. To reduce the incidence of developmental disabilities by providing or encouraging prevention programs including education and intervention.
 - e. To maximize opportunities for consumer and family input in needs assessment and resource development.
 - f. To effectively communicate with all constituencies the accomplishment of Corporate goals.
 - g. To develop resources to support the Long Range Plan of the

Corporation including its vision, mission, values and goals.

h. To ensure that community directed services are provided in accordance with the mandates and principles of the Lanterman Developmental Disabilities Services Act, the California Early Intervention Services Act, and other appropriate state and federal legislation.

2. ***Consumer/Family Freedom of Choice***

Standard: SDICDSI personnel shall respect consumer and family choice.

Policy: SDICDSI personnel must comply with all applicable federal and state laws, regulations, and contractual obligations relevant to consumer and family choice.

3. ***Fair Treatment of Personnel***

Standard: SDICDSI is committed to providing a work environment where employees treat each other with respect, fairness, and dignity.

Policy: SDICDSI personnel adhere to policies which prescribe equal employment opportunities without discrimination on the grounds of race, color, national origin, age (over 40), sex, sexual orientation, marital status, religious creed, mental impairment, physical disability, or medical condition.

4. ***External Relations - Representing the Corporation***

Standard: While conducting the business of the Corporation, SDICDSI personnel are representatives of the Corporation and its policies and procedures. SDICDSI personnel shall represent the Corporation in a manner that is professional, fair, accurate, and honest.

Policy: SDICDSI must conduct the business of the Corporation in a manner that adheres to the tenets of the Corporate Compliance Program.

5. ***Coding, Billing, and Accounting for Consumer Services and Corporate Activities***

Standard: SDICDSI purchases services that are determined to be necessary and contribute to the quality of life of consumers.

Policy: SDICDSI personnel who are responsible for performing Corporate activities including documenting, coding, billing, and accounting for consumer services must comply with all applicable state and federal regulations, SDICDSI policies and procedures pertinent to these activities and the Corporate Compliance Program.

6. ***Fiscal Reports***

Standard: SDICDSI fiscal reports accurately reflect the financial condition of the Corporation.

- Policy:
- a. SDICDSI personnel who are responsible for the preparation and submission of fiscal reports must ensure that all such reports are properly prepared and documented according to all applicable Corporate contracts and federal and state laws.
 - b. SDICDSI financial statements will be audited on at least an annual basis by an independent Certified Public Accountant licensed by the California Department of Consumer Affairs and the results of the audits will be reported to the Board of Directors.

7. ***Personal and Confidential Consumer Information***

Standard: All efforts will be made to protect personal and confidential or privileged information about SDICDSI consumers and their families.

Policy: SDICDSI personnel who have knowledge of personal and confidential information about consumers and their families must comply with all applicable federal and state laws to ensure that all such information is protected from improper disclosure.

8. ***Personal and Confidential Employee Information***

Standard: All efforts will be made to protect personal and confidential or privileged information about employees of SDICDSI.

Policy: SDICDSI personnel who have knowledge of personal and confidential information about any other Corporate employee must comply with all applicable federal and state laws to ensure that all such information is protected from improper disclosure.

9. ***Creation and Retention of Records***

Standard: All consumer and Corporate records are the property of SDICDSI. SDICDSI personnel responsible for the preparation and retention of Corporate records shall ensure that those records are accurately prepared and maintained in the manner and location as prescribed by law and SDICDSI policy.

- Policy:
- a. The complete and accurate preparation and maintenance of all records by SDICDSI staff are important for providing quality services and conducting the business of the Corporation.
 - b. SDICDSI staff will not knowingly create records that contain false, fraudulent, fictitious, deceptive, or misleading information. It is unlawful to knowingly make false entries in Corporate records.
SDICDSI staff who prepare and maintain Corporate records should do so in accordance with applicable statutes and regulations.

10. ***Requests for Information for Auditing and Monitoring Purposes***
Standard: SDICDSI personnel cooperate with appropriately authorized governmental investigations and audits.
- Policy: SDICDSI personnel must reply to all requests for information for auditing and monitoring purposes in accordance with applicable contracts, federal and state law, and federal and state regulations.
11. ***Maintaining Integrity in Business Dealings***
Standard: SDICDSI personnel must not accept or offer, for themselves or the Corporation, anything of value in exchange for the provision of services or the referral of business.
- Policy: SDICDSI personnel must comply with personnel regulations regarding the acceptance or offering of gifts from or to vendors, consumers, suppliers, or potential suppliers.
12. ***Conflicts of Interest***
Standard: SDICDSI personnel shall conduct Corporate and personal business in a manner that avoids potential or actual conflicts of interest.
- Policy: SDICDSI must comply with personnel regulations and state and federal laws regarding conflict of interest.

VIII. Whistleblower Policy

General: The SDICDSI Code of Conduct and Standards requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Directors, officers and employees must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility: It is the responsibility of all directors, officers and employees to comply with the Code of Conduct and Standards and to report violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation: No director, officer or employee who in good faith reports a violation of the Code of Conduct and Standards shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation or suspected violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns and to seek resolution if warranted.

Reporting Violations: The Code of Conduct and Standards addresses the SDICDSI open door policy and suggests that employees and others share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if an employee is not comfortable speaking with his or her supervisor or is not satisfied with the supervisor's response, the employee is encouraged to speak with the Director of the Human Resources Department or someone else in management whom they are comfortable in approaching. Supervisors and managers are required to report violations or suspected violations of the Code of Conduct and Standards to the Director of Human Resources, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, employees should immediately contact the Director of Human Resources. Directors, officers and employees should report violations or suspected violations of the Code of Conduct and Standards to the Director of Human Resources.

Compliance Officer: The Compliance Officer for the Code of Conduct and Standards and for the Whistle Blower Policy is the Director of Human Resources. The Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code of Conduct and Standards and, at his or her discretion, shall advise the Executive Director and/or the Chair of the Board of Directors. The Compliance Officer and the Executive Director will annually report to the Board of Directors on compliance activity.

Accounting and Auditing Matters: The Compliance Officer will address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the Executive Director and the Finance Committee of any such complaint and work with them until the matter is resolved.

Acting in Good Faith: Anyone filing a complaint concerning a violation or suspected violation of the Whistleblower Policy must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code of Conduct and Standards. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality: Reports of violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Processing Reported Violations: The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

ACKNOWLEDGMENT STATEMENT

**SAN DIEGO-IMPERIAL COUNTIES DEVELOPMENTAL SERVICES, INC.
CORPORATE COMPLIANCE PROGRAM
AND
CODE OF CONDUCT AND STANDARDS HANDBOOK**

My signature on this form acknowledges that I have received and read the San Diego-Imperial Counties Developmental Services, Inc. Corporate Compliance Program and Code of Conduct and Standards Handbook.

I also acknowledge that the Corporate Compliance Program Handbook contains an outline of principles for individual and business conduct. I agree to be bound by their tenets during the course of my employment with SDICDSI. I further understand that this policy does not constitute an employment contract or an assurance of continued employment.

Name (Please Print)

Signature

Date

Department or Unit

Instructions: Please complete this form, sign, and send to Human Resources