

May Institute

Standards of Ethical Conduct

Introduction

Employees of the May Institute are committed to the highest ethical standards in furtherance of its mission to serve individuals with autism spectrum disorder and other developmental disabilities, brain injury, mental illness, and behavioral health needs. This mission requires a shared commitment to the core values of the May Institute as well as a commitment to the ethical conduct of all May Institute activities. The May Institute and its employees have a responsibility to conduct themselves in a way that reflects their dedication to ethical standards and commitment to compliance with all applicable laws and regulations. This commitment is demonstrated in the Standards of Ethical Conduct which is a statement of our belief in ethical, legal and professional conduct in all dealings inside and outside of the May Institute.

May Institute Mission – Excellence in Service, Training & Research

May Institute proudly serves individuals across the life span with autism, developmental disabilities, intellectual disabilities, neurological disorders, behavior disorders, and mental illness to promote independence, choice, dignity and respect. We provide compassionate and caring educational, therapeutic, habilitative, and consulting services grounded in evidence-based practice.

May Institute is committed to excellence in specialized services through training, research and the highest level of professional expertise to meet the broad range of needs in individuals, families, schools, and communities.

Vision Statement

We will make a difference every day in the lives of the children, adolescents, and adults we serve.

As a service provider, we will:

- Deliver the highest quality services and state-of-the-art interventions
- Commit to continual service improvements through research
- Maintain fiscal stability through sound management and growth strategies

As an employer, we will:

- Be an employer of choice with the best trained, dedicated and diverse workforce
- Foster an environment of respect
- Facilitate excellent and open lines of communication

As a recognized leader, we will:

- Provide innovative, evidence-based care
- Hire experts in the field
- Publish research and present at national conferences
- Promote transparency and accountability to our stakeholders

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Values Statement

A. Dignity

We will strive to provide dignity to our employees, coworkers and the individuals we serve. We will also provide a safe and supportive environment.

B. Integrity

We will conduct ourselves with the utmost integrity in our dealings within, and on behalf of, the May Institute.

C. Quality

We will strive for excellence in the performance of our work. We will strive for excellence by: (1) using validated research to support and measure our results and successes; and (2) strictly adhering to state of the art business practices.

D. Accountability

We will be accountable, as individuals and as employees, for our ethical conduct and for our compliance with all applicable laws and the May Institute's policies, procedures, and standards.

E. Respect

We will respect the rights and dignity of others, and support diversity and cultural appreciation. We will respect each person we serve and each other, as professionals.

Applicability

The May Institute is committed to providing quality and comprehensive educational and rehabilitative services for individuals with autism, developmental disabilities, neurological disorders, behavioral disorders and mental illness. The May Institute is dedicated to the principle that all individuals, employees and guests deserve to be treated with dignity, respect and courtesy. Our policies, procedures, and standards provide guidance for application of the ethical values stated below in our daily work as employees of the May Institute.

The Standards of Ethical Conduct apply to all employees of the May Institute, including the Board of Directors, volunteers, contractors, agents and others associated with the May Institute. Organizationally, these Standards apply to all May Institute locations and programs.

1. Fair Dealing

Employees of the May Institute are expected to conduct themselves ethically, honestly and with integrity in all dealings. This means employees are expected to apply principles of fairness, act in good faith, and provide respect to others consistent with all applicable laws and the May Institute's policies, procedures, and standards. Employees are expected to conduct themselves in this matter within, and on behalf of, the May Institute. Each situation needs to be examined in accordance with the Standards of Ethical Conduct. No unlawful practice or a practice at odds with these standards will be tolerated.

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2. Individual Responsibility and Accountability

Employees of the May Institute are expected to exercise responsibility appropriate to their position and employment duties. Employees are responsible to their coworkers, the May Institute, and the May Institute's stakeholders, for their actions and failure to act when necessary. Each individual is expected to conduct the business of the May Institute in accordance with the Standards of Ethical Conduct by exercising sound judgment and serving the best interests of the organization and the individuals served.

3. Respect for Others

The May Institute is committed to the principle of treating each community member with respect and dignity. The May Institute prohibits discrimination and harassment and provides equal opportunities for employees and applicants regardless of race, color, religion, ancestry, national origin, age, disability, gender, marital status, sexual orientation, veteran status, military status, genetic information, or any other category protected under applicable law. Further, romantic or sexual relationships between staff and individuals served of the May Institute are prohibited. The May Institute is committed to creating a safe and drug free workplace. The following is a list of the principal policies and reference materials available in support of this standard:

- The Employee Handbook
- Corporate Leadership Policies
- Corporate Information Management Policies
- Corporate Environment/Safety Policies
- Human Resources Policies, including Sexual and Other Harassment in the Workforce, nondiscrimination and affirmative action
- Leadership Policy on Right/Ethics – Research -The May Institute's research enterprises are committed to the ethical and compassionate treatment of clients and have established policies and statements of patient rights in support of this principle.

4. Compliance with Applicable Laws and Regulations

The May Institute is subject to strict adherence to state and federal laws and regulations to the preparation and billing for health care services. Such laws and regulations apply to the organization on account of its participation in Medicare, Medicaid/MassHealth and other state and federal government health care programs. To ensure adherence to these laws, the May Institute has developed a Compliance Program designed to prevent and detect fraud, waste and abuse, and to guard against excessive charges and unnecessary costs to such health programs. The May Institute Compliance Program outlines the responsibilities and obligations of employees regarding submissions for reimbursement to government health programs, as well as to private health plans for services rendered by the organization and any of its contractors. May Institute employees are expected to become familiar with the laws and regulations relating to each employee's duties and responsibilities. Many, but not all, legal requirements are embodied in the May Institute's policies. Failure to comply with applicable laws may have serious adverse consequences, both for individuals, and for the May Institute, in terms of reputation, finances and the health and safety of the organization. May Institute business is to be conducted in conformance with legal requirements, including contractual commitments undertaken by individuals authorized to bind the May Institute to such commitments. Such commitments extend the May Institute's business arrangements with physicians, vendors, contractors and other agents who may be impacted by federal or state laws relating to the preparation and billing for health care services. As such, the May Institute

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ensures compliance with the False Claims Act, Stark Statute and other applicable laws to prevent fraud and abuse.

5. Compliance with Applicable May Institute Policies, Procedures and Other Forms of Guidance

The May Institute's policies and procedures are designed to guide everyday responsibilities, to set minimum standards and to give May Institute employees notice of expectations. Employees of the May Institute are expected to transact May Institute business in conformance with policies and procedures. Accordingly, May Institute employees have an obligation to become familiar with all policies and procedures, especially those which relate to employment responsibilities and duties. Each member is expected to seek clarification on a policy or other May Institute directive that s/he finds to be unclear, outdated or at odds with the May Institute objectives. It is not acceptable to ignore or disobey policies for any reason or misapply policy and procedure.

In some cases, May Institute employees are also governed by ethical codes or standards of their professions or disciplines—some examples are psychologists, social workers, physicians, nurses, mental health counselors, teachers and related staff. It is expected that those employees will comply with applicable professional standards in addition to laws and regulations.

6. Conflicts of Interest or Commitment

Employees of the May Institute are expected to devote primary professional allegiance to the May Institute and to its mission. Outside employment must not interfere with May Institute duties. Outside professional activities, personal financial interests, or acceptance of benefits from third parties can create actual or perceived conflicts between the May Institute's mission and an individual's private interests. The May Institute employees who have certain professional or financial interests which may conflict or appear to conflict, are expected to disclose them in compliance with applicable conflict of interest policies. In all matters, May Institute employees are expected to take appropriate steps, including consultation if issues are unclear, to avoid both conflicts of interest and the appearance of such conflicts in accordance with Conflict of Interest policy.

7. Ethical Conduct of Research

May Institute employees engaged in research are expected to conduct their research with integrity and intellectual honesty at all times and with appropriate regard for human subjects. To protect the rights of human subjects, the specific informed consent of individuals (or their guardian) must be obtained prior to initiation of research activity. In accordance with Right/Ethics –Research policy, participation in research is voluntary and the individual is free to withhold consent or to withdraw consent and discontinue participation in the research at any time without penalty or loss of benefits. All research involving human subjects is to be reviewed by Research Review Committee. The May Institute prohibits research misconduct. Employees of the May Institute engaged in research are not to: fabricate data or results; change or knowingly omit data or results to misrepresent results in the research record; or intentionally misappropriate the ideas, writings, research, or findings of others. All those engaged in research are expected to pursue the advancement of knowledge while meeting the highest standards of honesty, accuracy, and objectivity. They are also expected to demonstrate accountability for sponsors' funds and to comply with specific terms and conditions of contracts and grants.

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8. Records: Confidentiality/Privacy and Access

The May Institute is the custodian of many types of information, including confidential, proprietary and private information. Individuals who have access to such information are expected to be familiar, and to comply with, all applicable laws, May Institute's policies, practices and agreements pertaining to access, use, protection and disclosure of such information. Computer security and privacy are also subject to applicable law and May Institute policy. Information on the principles of privacy or on specific privacy laws may be obtained from the May Institute Privacy Officer.

The public right to information access and the individual's right to privacy are both governed by state and federal law, as well as by the May Institute's policies and procedures. The May Institute's policies and procedures are based upon the principle that every individual served has the right to privacy.

9. Internal Controls

Internal controls are the processes employed to help ensure that the May Institute's business is carried out in accordance with the Standards of Ethical Conduct, May Institute's policies and procedures, applicable laws and regulations, and accepted business practices. Such controls promote efficient operations, accurate financial reporting, protection of assets and responsible fiscal management. Each business unit or department head is specifically responsible for ensuring that internal controls are established, properly documented, and maintained for activities within their jurisdiction. Any individual entrusted with funds, including principal investigators, is responsible for ensuring that adequate internal controls exist over the use and accountability of such funds.

10. Use of May Institute Resources

The May Institute resources may only be used for activities on behalf of the May Institute. They may not be used for private gain or personal purposes except in limited circumstances permitted by existing policy where incidental personal use does not conflict with, and is reasonable in relation to, May Institute duties (e.g. telephones). Employees of the May Institute are expected to treat May Institute property with care and to adhere to laws, policies and procedures for the acquisition, use, maintenance, record keeping and disposal of May Institute property. May Institute resources are defined to include, but not limited to the following, whether owned by or under the management of the May Institute:

- Cash, and other assets whether tangible or intangible; real or personal property;
- Receivables and other rights or claims against third parties;
- Intellectual property rights;
- May Institute personnel and of any non-May Institute entity billing the May Institute;
- Facilities and the rights to use May Institute facilities;
- The May Institute name;
- May Institute records, including individual records; and
- The May Institute information technology infrastructure.

11. Financial Reporting

May Institute accounting and financial records, tax reports, expense reports, time sheets and financial reports, and other documents including those submitted to government agencies must be accurate, clear

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and complete. All published financial reports will make full, fair, accurate, timely and understandable disclosures as required under generally accepted accounting principles for government entities and other requirements. Certain individuals with responsibility for the preparation of financial statements and disclosures, or elements thereof, may be required to make attestations in support of the Standards of Ethical Conduct.

12. Reporting Violations and Protection from Retaliation

Employees of the May Institute community are strongly encouraged to report all known or suspected improper governmental activities under the provisions of the Right/Ethics Policy on False Claims Prevention and Compliance Policy (Whistleblower Policy). Managers and those in supervisory roles are required to report allegations presented to them and to report suspected improper activities that come to their attention in the ordinary course of performing their supervisory duties. Reporting parties, including managers and supervisors, will be protected from retaliation for making such a report under the Policy for Non-Retaliation/Whistleblower.