

POLICY

Greater Mental Health is committed to providing quality services and to conducting its business lawfully and ethically. To do this, all Greater Mental Health's employees must meet high professional standards of care and service and carry out daily activities within appropriate ethical and legal standards. All applicable laws, rules, and regulations must be strictly followed.

These standards must be followed in dealing with recipients of Greater Mental Health services and their families, other Greater Mental Health staff, contractors, payers, governmental organizations, vendors, and the public. Violations of these standards jeopardize Greater Mental Health's ability to provide its services and the welfare of the agency and its staff.

To assure uniformity in standards of conduct, Greater Mental Health has established this Standard of Conduct as part of its Compliance Program. Under the Compliance Program, a Compliance Officer and a Compliance Committee have been appointed to ensure adherence with the Compliance Program, to serve as contacts for employees, consultants, volunteers, and interns to clarify questions regarding this Standard of Conduct, and to investigate reports of any violations of laws, rules, regulations, policies, procedures, or this Compliance Program.

This Standard of Conduct, the Personnel Policies, and the policies and procedures of Greater Mental Health and individual Greater Mental Health programs are not meant to cover all situations. Any doubt whatsoever as to the propriety of a particular situation or action, whether the situation or action is described within this Standard of Conduct or in other Greater Mental Health policies, should be submitted either to your immediate supervisor, to the Compliance Officer or to a member of the Compliance Committee. The principles in the Standards are to be adhered to in addition to (not as a substitute for) the ethical guidelines of all applicable professions, law, licensing agencies and internal policies that apply to the respective programs of Greater Mental Health. Claims of failure to understand or to be aware of these standards will not be accepted as excuses for non-compliance.

Every Greater Mental Health employee is required to understand and comply fully with the rules and procedures established by this Standard of Conduct, the Personnel Policies, and those policies and procedures established by Greater Mental Health and their individual programs. In case of any inconsistency, this Standard of Conduct shall govern.

Greater Mental Health's Policies and Procedures

- Greater Mental Health will provide training on policies and procedures to all its employees.
- Greater Mental Health will provide contractors and agents with a copy of this Detection and Prevention of Fraud Waste & Abuse Policy.
- Greater Mental Health will perform billing activities in a manner consistent with the regulations and requirements of third-party payors, including Medicaid and Medicare.
- Greater Mental Health will conduct regular auditing and monitoring procedures as part of its efforts to ensure compliance with applicable regulations.
- Any employee, contractor or agent who believes anyone is engaging in false billing practices or false documentation of services must report the practice to the Compliance Officer or any other senior management member.
- Any form of retaliation against any employee who reports a perceived problem or concern in good faith is strictly prohibited.
- Any employee who commits or condones any form of retaliation will be subject to discipline up to, and including, termination of employment.

Greater Mental Health's Responsibilities to You

It is Greater Mental Health's responsibility to:

- Train every Greater Mental Health employee on the Standard of Conduct, Compliance Policies and Procedures relevant to each employee's duties.
- Not tolerate any act of intimidation, retaliation, or retribution against an employee who makes a "good faith" report of a potential violation of any law, rule, regulation, standard, policy, or this Standard of Conduct.
- Discipline those who commit violations of any aspect of the Compliance Program up to and including termination of employment.
- Encourage each Greater Mental Health manager in their responsibility to create a work environment in which ethical concerns can be raised and will be appropriately addressed.
- Monitor the effectiveness of the Compliance Program and modify the Program as appropriate and as changes occur to laws, rules and regulations.
- Employ properly credentialed individuals with the experience, resources, and supervision necessary to perform their duties.
- Hire and retain qualified individuals without regard to race, color, religion, gender, sexual orientation, gender identity or expression, age, military or veteran status, national origin, marital status, pregnancy, citizenship or immigration status, disability, genetic predisposition, veteran status, or any other characteristic that may otherwise be prohibited by applicable federal, state or local law.
- Screen all prospective employees to ensure that they have not been sanctioned by any health care regulatory or licensing agency and are eligible to perform their designated responsibilities, in accordance with applicable law.
- Show proper respect and consideration to our employees regardless of position, and not to tolerate discriminatory treatment, sexual harassment or unlawful harassment or behavior of any kind.
- Submit accurate and complete claims for all services provided and maintain appropriate documentation to support the claims.
- Bill for services according to medical necessity guidelines established by the various payers.
- Train and continually educate staff responsible for coding and billing functions.
- Notify payers of payment errors and process refunds promptly and accurately.
- Establish internal controls to ensure the accuracy of financial statements and all other records and reports.
- Provided with a workplace that conforms to regulations regarding occupational health and safety. Any safety concerns should be reported to the Facilities and Human Resources Department.

Responsibilities of Supervisors and Managers

It is your supervisor's responsibility to:

- Set the tone and maintain a work environment that encourages ethical and responsible behavior and to establish an environment in which employees feel comfortable addressing compliance issues without fear of reprisal.
- Discuss the Compliance Program regularly, including the Standard of Conduct, and encourage questions from you/your colleagues.
- Evaluate your adherence to the Compliance Program as part of your annual performance review.

Your Responsibilities as a Greater Mental Health Employee

It is your responsibility to:

- Comply with the Compliance Program and Greater Mental Health's Standard of Conduct and know and follow all the rules and regulations that govern your job.
- Devote your full time and ability to Greater Mental Health during working time.

- Report any actual or potential violation(s) or conduct that you reasonably believe to be in violation, of the laws, rules or regulations, this Standard of Conduct, or Greater Mental Health policies and procedures.
- Submit accurate, complete, and truthful records of your work, including any written documentation needed to support the services you provided.
- Participate in training provided by Greater Mental Health regarding legal requirements, this Standard of Conduct, Greater Mental Health policies and procedures, and other topics that may be presented.
- Treat each recipient of Greater Mental Health services with respect, dignity, patience and kindness and to never discriminate against or harass anyone on the basis of race, color, religion, gender, sexual orientation, gender identity or expression, age, military or veteran status, national origin, marital status, pregnancy, citizenship or immigration status, disability, genetic predisposition, veteran status, or any other characteristic that may otherwise be prohibited by applicable federal, state or local law.
- Maintain the confidentiality of recipient information and information related to Greater Mental Health operations in accordance with Health Insurance Portability and Accountability (HIPAA). All staff must adhere to Greater Mental Health HIPAA policies, failure to do so may result in disciplinary action up to and including termination. This responsibility extends past the end of your employment with Greater Mental Health.
- Refrain from giving or accepting any form of gift or gratuity that might influence, or appear to influence, your or another person's judgment in the performance of his or her job duties.
- Refrain from offering or receiving anything of value to induce you or another person to purchase an item or service from Greater Mental Health, to refer a person to Greater Mental Health, or to market Greater Mental Health's products or services.
- Refrain from receiving anything of more than nominal value (no more than \$50) in connection with your employment at Greater Mental Health. All gifts valued at more than \$50 must be reported to the Compliance Officer. Gifts received valued at more than \$50 may not be accepted. An employee may accept meals only if such courtesies are unsolicited, infrequently provided and meet the monetary limits above. Gifts of cash or cash equivalents, of any value, are never appropriate.
- Refrain from contributing or donating Greater Mental Health's funds, products, services or other resources to any political party or candidate.
- Avoid situations where personal interest could conflict or appear to conflict with your responsibilities, obligations, or duties to Greater Mental Health. Additionally, any financial interest that you or any immediate family member may have in any establishment that does business with Greater Mental Health. Upon hire and annually thereafter, you will be asked to disclose any conflicts of interest. If you have any questions regarding conflict of interest, please contact the Compliance Officer.
- Refrain from making misrepresentations, dishonest statements, or statements intended to mislead or misinform individuals about the quality of Greater Mental Health's products or services or those of a competitor.
- Refrain from using Greater Mental Health property or services for personal gain or benefit; you may not remove or dispose of Greater Mental Health materials, supplies or equipment without proper authority.
- Ensure that confidential and proprietary information of Greater Mental Health is carefully maintained and managed to protect its disclosure to the public.
- Comply with local, state, and federal laws and regulations regarding government contracts and programs in which Greater Mental Health participates.
- Tell the truth and cooperate with any investigation of a potential compliance or other legal matter, whether investigated by Greater Mental Health representatives or government authorities.
- Use Greater Mental Health equipment appropriately and take measures to prevent unexpected loss of equipment, supplies, materials or services.

- Adhere to Greater Mental Health Records Management policy and comply with the record retention and destruction schedule.

Our Responsibilities to Recipients of Greater Mental Health Services

Providing high quality patient care, products and services is a primary objective of Greater Mental Health. Whether an individual has direct service responsibilities or an indirect impact on services, this commitment to serving the needs and best interests of those who come to us for services should guide all business decisions. In discharging these responsibilities, the safety and well-being of each person we serve must be given the highest consideration.

Each recipient of Greater Mental Health services:

- Be treated as an individual, with respect given to their dignity, autonomy, and self-esteem, with the same high quality and cost-effective treatment provided regardless of payment source or level of reimbursement. No distinction will be made in admission, transfer, or discharge activities based on race, color, religion, gender, sexual orientation, gender identity or expression, age, military or veteran status, national origin, marital status, pregnancy, citizenship or immigration status, disability, genetic predisposition, veteran status, or any other characteristic of the patient.
- Be assured that Greater Mental Health complies with all federal, state, and local laws and regulations regarding recipient rights, including the right to participate in their care; the right to freedom of choice in decisions regarding services, their provision and anticipated cost; the right to receive full and accurate information regarding the proposed service/treatment; the right to give informed consent to such service/treatment; and the right to maintain confidentiality of their information.
- Be served in accordance with the plan established with the recipient or recipient's guardian by the recipient's clinician/case manager/counselor. Treatment/service plans will be altered as needed in response to changes in the recipient's status.
- Be provided with a grievance procedure to report when service principles are not followed.
- Be served by properly licensed, credentialed and/or skilled professional and para-professional employees or contractors.
- Be informed of the reasons for any recommended treatment or service, methods used to accomplish the treatment or service, and necessary follow-up required of family members or other caregivers.

Employees must report any violations of this Standard of Conduct, the Personnel Policies, or other Greater Mental Health policies to the Compliance Officer or to a member of the Compliance Committee. Nothing in this policy, or any other Greater Mental Health policy or agreement, shall prohibit employees from reporting suspected violations of law or regulation to any governmental agency, regulatory body, self-regulatory organization, or law enforcement agency (collectively a "law enforcement entity"), from making any other disclosures that are protected under any law or regulation, or from participating or cooperating in any inquiry, investigation, or proceeding conducted by such law enforcement entity, or from making other disclosures that are protected under state or federal law or regulation.

Furthermore, the whistleblowing protections for Greater Mental Health employees are extended to (i) any activity, policy, or practice of Greater Mental Health that the employee reasonably believes is in violation of the law; or (ii) any activity, policy or practice of Greater Mental Health that the employee reasonably believes poses a substantial and specific danger to the public health or safety. Greater Mental Health will not retaliate against any employee that complains of the suspected wrongdoing, or who objects to, or refuses to participate in any such activity, policy, or practice.

Failure to personally comply with these standards or to report suspected non-compliance will result in disciplinary action. Any intimidation, retaliation, or retribution for asking questions or reporting compliance concerns in good faith about the Standard of Conduct or about conduct observed in the workplace is also prohibited. The intent of Greater Mental Health's Compliance Program is to safeguard Greater Mental Health's services and to continue its tradition of strong moral, ethical and legal standards

Standards of Conduct

of conduct. Any employee violating any provision of this Standard of Conduct, the Personnel Policies, or other Greater Mental Health policies will be subject to disciplinary action, up to and including termination from employment.

Approved by: Stacey Roberts, LCSW, Chief Executive Officer	Signature:
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