

CORPORATE COMPLIANCE PLAN

North Country Health Consortium (NCHC) is committed to providing the highest quality behavioral health services that promote and support each individual's unique needs. NCHC has always sought to adhere to all laws, rules, and regulations, and has always stated that it is the obligation of all employees, volunteers, contractors and other professionals to follow the organization's Ethical Code of Conduct as well as their own professional Ethical Code of Conduct. The organization understands that in this time of rapid health care changes that ongoing training and education will be necessary to maintain commitment to quality care, therefore the Chief Executive Officer has assumed the role of NCHC Corporate Compliance Officer with ongoing access to the governing board.

NCHC has a regulatory compliance program whose purpose is to assist in preventing the submission of erroneous claims or engaging in unlawful conduct involving federal health care programs. This compliance program further asserts that all employees have an affirmative, ethical duty to come forward and report erroneous or fraudulent conduct, so that it may be corrected. This plan addresses the seven components outlined by the Compliance Program guidance issued by the U.S. Officer of the Inspector General: written standards of conduct for employees; written policies promoting commitment to compliance and addressing specific areas of potential fraud; designated compliance officer; education and training; audits to monitor compliance; disciplinary action; investigation and remediation of identified problems.

MISSION STATEMENT

North Country Health Consortium leads innovative collaboration to improve the health status of the region.

ETHICAL CODE OF CONDUCT

NCHC holds its employees, and independent contractors to the highest ethical, moral, and legal standards in their conduct and service delivery. NCHC expects its employees, and independent contractors to maintain respect both for the privacy and well-being of the persons served and for the welfare and protection of the general public. NCHC strives to enhance the principles of competency, accountability, responsibility, nondiscrimination and service excellence. NCHC's employees, and independent contractors, in fulfilling the mission of NCHC, voluntarily subscribe to uphold these stated principles.

Additional detail may be found in NCHC Ethical Code of Conduct.

STANDARDS OF CONDUCT

NCHC current corporate policies and procedures are reasonably capable of reducing the prospect of erroneous or unlawful conduct involving federal healthcare programs and are the foundation of the compliance plan. Where necessary, NCHC will develop additional procedures to ensure compliance.

The Chief Executive Officer, in conjunction with the management team, will be responsible for the implementation of the compliance plan and for maintaining an ongoing program of compliance through education, training and the development of appropriate policies and procedures.

NCHC will use due care not to delegate substantial discretionary authority to individuals whom the organization knows, or should know, through exercise of due diligence, has a propensity to engage in illegal activities.

NCHC will take steps to communicate effectively its standards and procedures to all employees by requiring participation in training programs or by disseminating publications that explain in a practical manner, what is required.

NCHC will take reasonable steps to achieve compliance with its standards by utilizing monitoring and auditing systems reasonably designed to detect criminal conduct by its employees, and by having in place and publicizing a reporting system whereby employees may report criminal conduct by others within the organization without fear of retribution.

The standards will be consistently enforced through appropriate disciplinary mechanisms, including, as appropriate, discipline of individuals responsible for the failure to detect an offense. Adequate discipline of individuals responsible for an offense is a necessary component of enforcement; however, the form of discipline that will be appropriate will be case specific.

After an offense has been detected, NCHC will take all reasonable steps to respond appropriately to the offense and to prevent further similar offenses, including any necessary modifications to its program to prevent and detect violations of law.

INVESTIGATION PROCESS AND TIMEFRAMES

Upon receipt of any report of suspected wrongdoing (including an alleged violation of the NCHC's Ethical Code of Conduct), the Chief Executive Officer will initiate an immediate investigation. Investigations of corporate compliance matters will be conducted as expeditiously as possible with results, including recommendations for any disciplinary and/or corrective action. The Chief Executive Officer or his/her designee is authorized direct and unimpeded access to all staff members to expedite corporate compliance investigations. All corporate compliance investigations will be completed as quickly as possible, but not later than 30 calendar days from the time of "discovery".

BUSINESS ETHICS

NCHC will operate in accordance with all applicable laws and regulations in order to maintain the integrity of the organization. Employees have a duty to report any perceived violation of applicable laws, regulations and professional standards to management, human resources, or the Chief Executive Officer.

In all business, marketing and human resource practices, employees will be guided by the corporate philosophy and ethical standards of honesty, integrity, respect and fairness with clients, vendors/suppliers, employees and community partners. In all business and marketing activities, all employees are required to represent the organization and its programs and services in an honest manner and to accurately portray the capabilities of the organization and its employees. This is an essential step if the organization is to establish productive and meaningful professional relationships in the local area. A critical part of the organization's corporate compliance program is the expectation that each employee will fully comply with all state and federal laws, statutes, rules and regulations pertaining to business, marketing and human resources and do so at all times and without exception.

No business ethical code of conduct can cover every conceivable scenario that might arise in the course of business, marketing, human resource management and business in general. Therefore, all employees are expected to follow the guiding principles and to seek assistance and clarification from the Chief Executive Officer in the event that any situation or scenario arises that might challenge the application of these principles. As a related matter, situations and circumstances occasionally arise that may represent a potential conflict of interest. As a general principle, no employee will make any decision on behalf of the organization or obligate the organization in any way that would represent, result in or give the appearance of personal gain or benefit, however slight. In such cases, employees should discuss the situation with the Chief Executive Officer prior to making any decision or engaging in any practice that would represent a commitment of the organization's assets, obligate the organization in any way and/or have the potential to give the appearance of impropriety or conflict of interest.

As part of the new employee orientation process, all new employees will be fully informed as to the organization's expectations regarding conformance with all applicable codes of conduct. Additionally, new employees will be asked to sign a copy of the organization's code of ethics as a way to demonstrate their awareness of the code. Finally, a copy of the Ethical Code of Conduct will be posted conspicuously at each site of the organization as a reminder to clients, staff, and partners about NCHC's ongoing commitment to quality care.

Billing and Cost Reports

- NCHC strictly prohibits the submission of any claim for payment or reimbursement to any third party that is false, fraudulent, knowingly inaccurate, or fictitious.
- NCHC will only submit for payment or reimbursement claims for services actually rendered that are appropriately documented in clients' treatment and/or medical records using billing codes that accurately describe the services provided.
- NCHC will only provide those services which are individualized, specific, and consistent with symptoms or confirmed diagnosis of the illness and can reasonably be expected to improve the individual's condition or prevent further regression, and not in excess of the client's need.
- NCHC will take immediate steps to alert appropriate NCHC personnel if inaccuracies are discovered in our cost reports or in claims submitted for payment or reimbursement.

Client Referrals

NCHC will not solicit or receive, or offer to give, or give anything of value (e.g., in cash or in kind) to any actual or potential referral source for the referral of clients or services. Kickbacks, bribes, rebates or any kind of benefits intended to induce referrals are strictly prohibited.

Client Treatment Records

- NCHC will maintain complete and accurate client treatment records.
- NCHC will ensure that all client treatment records and related information, including the fact that a person is a client of NCHC, remain strictly confidential.

ENVIRONMENTAL LAWS

NCHC will promote sound environmental and safety practices to ensure compliance with all relevant laws, regulations and accreditation standards.

CONFLICT OF INTEREST

NCHC will take all reasonable steps to avoid conflicts, or appearance of conflicts, between the private interests and the official responsibilities and performance of NCHC duties. NCHC employees will not have a financial interest in or a business relationship with another organization nor will they solicit or accept gifts, favors, loans or other types of gratuities that might result in any conflict with the purposes, aims or goals of NCHC. NCHC employees have a duty to report any actual or perceived conflict of interest to management or the Chief Executive Officer. If a potential conflict of interest is identified, the employee involved will be disqualified in the final decision-making process of whether or not NCHC will enter into any kind of agreement with the third party.

PROTECTION OF ASSETS

NCHC is committed to protecting the organization's assets and the assets of others entrusted to us, including physical property and proprietary information, against loss, theft, or misuse. NCHC employees have a duty to report any actual or perceived loss, theft or misuse of NCHC property or the assets of others to management or the Chief Executive Officer.

NCHC employees are responsible and accountable for the proper expenditure of NCHC funds and for the proper use of the organization's property. Employees will obtain approval from the appropriate authority, prior to the commitment or expenditure or any NCHC funds.

NCHC will follow generally accepted accounting principles, established finance procedures and internal control procedures in handling and recording all funds and property.

NCHC employees have a duty to preserve NCHC's assets, property, facilities, equipment and supplies.

NCHC employees have a duty to safeguard the property of clients, employees and visitors.

HUMAN RESOURCES

NCHC is committed to protecting and supporting all employees as well as helping them to achieve their fullest potential in a fair and equitable manner. NCHC employees have a duty to report any actual or perceived mistreatment, discrimination, safety issues, hostile activity, legal violations or other non-compliance issues occurring in the workplace to management or the Chief Executive Officer.

CORPORATE RESPONSIBILITIES

NCHC will not tolerate any form of physical, psychological or sexual abuse. Sexual abuse includes unsolicited or unwelcome sexual advances, requests or demands for sexual favors or any verbal, physical or visual conduct of a sexual nature, which might create a hostile or uncomfortable environment.

NCHC employees will conform to the standards of their professions and will exercise reasonable judgment and objectivity in the performance of their duties.

NCHC employees will demonstrate respect for their clients and co-workers by notifying supervisor in advance if they are unable to report for work as scheduled.

EQUAL EMPLOYMENT OPPORTUNITIES

NCHC will ensure that everyone is afforded equal pay for equal work regardless of gender, gender identity, age, disability, race, color, religion, marital status, sexual orientation or national origin.

SAFETY

NCHC employees will comply with all work and safety rules, regulations and policies.

NCHC will take all reasonable precautions to ensure the safety of employees, as well as the safety of clients, visitors, and other personnel.

NCHC maintains and regularly communicates its emergency plans and procedures to employees and clients to maximize safety. NCHC employees practice safety awareness by thinking defensively, anticipating potential hazards and reporting unsafe conditions immediately. NCHC maintains an atmosphere that is free from workplace violence. NCHC does not engage in verbal or physical confrontation with a potentially violent person except in extenuating circumstances (for example, active shooter situation).

NCHC promotes a work environment that discourages smoking.

NCHC promotes an environment that is drug and alcohol free. The illegal possession, distribution, use, sale or abuse of controlled chemical substances or alcohol while on NCHC premises is strictly prohibited.

COMMUNICATION

NCHC will foster an environment that encourages open communication. NCHC employees have a duty to report any actual or perceived communication problem to management or the Chief Executive Officer.

- **Organization Communication**-NCHC employees are responsible for sharing ideas, resolving problems or concerns and treating all opinions with respect and consideration. NCHC employees raise legitimate questions or concerns in an appropriate and efficient manner. Supervisors and management shall respond, in a timely manner, to questions and concerns brought to their attention.

EMPLOYEE RESPONSIBILITIES

Maintaining high standards of ethical and moral conduct is in everyone's best interest. Responsibilities include the following:

- Acting in accordance with NCHC Ethical Code of Conduct

- Being familiar with relevant laws and regulations that apply directly to day-to-day responsibilities
- Asking questions when in doubt about the ethical, legal, or moral implications of a situation
- Reporting violations of the law, regulations, or NCHC Ethical Code of Conduct

MANAGERS/SUPERVISORS RESPONSIBILITIES:

- Respect diverse opinions
- Maintain an open-door policy and listen to issues that are raised
- Respond to questions and problems in a timely manner
- Assist employees in understanding their rights and obligations under law, regulations, and the Ethical Code of Conduct

CORPORATE RESPONSIBILITIES:

Non-Retaliation Policy- NCHC will not take any disciplinary action or other types of retaliation against any employee who, in good faith, reports a concern, issue, or problem to management, or the Chief Executive Officer.

RISK AREAS

NCHC does conduct coding audits preliminary to billing submission. Education and training is designed to facilitate knowledge and understanding of the applicable coding policies and procedures and also addresses problems detected through the audit process.

Coding and billing risk areas include the following:

- Billing for items or services not actually documented
- Alteration of documentation
- Coding without proper documentation
- Billing for services provided by unqualified or unlicensed clinical personnel
- Availability of all necessary documentation at the time of coding
- Confidentiality of information/records
- Accurate use of provider identification numbers
- Duplicate billing
- Waiver of co-payments and billing third party insurance only