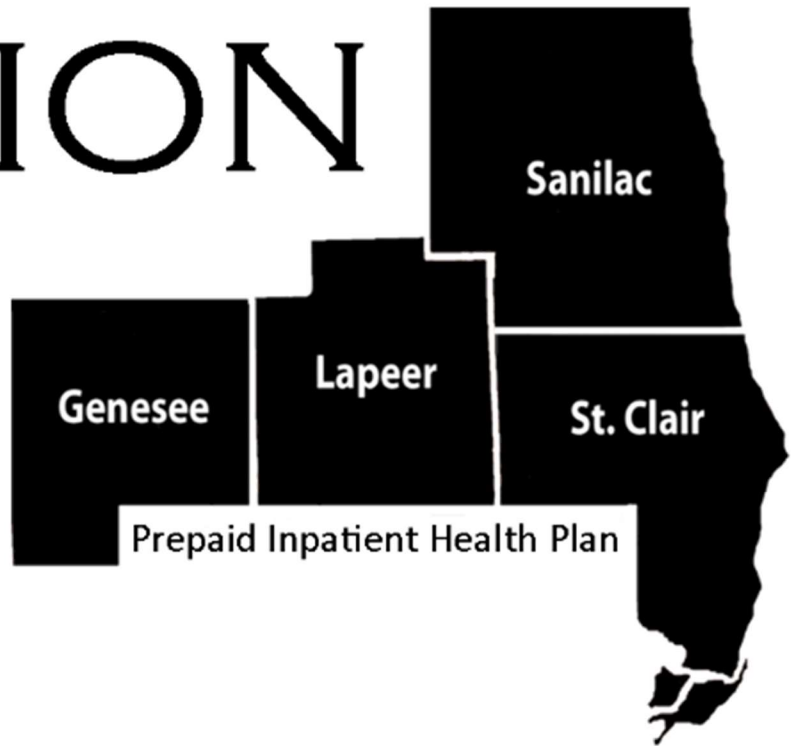


REGION

10



Prepaid Inpatient Health Plan

CODE OF CONDUCT

Adopted (2018)
Reviewed (2023)

OVERVIEW

The Code of Conduct serves to function as a foundational document that details the fundamental principles, values and framework within Region 10. The Code of Conduct articulates Region 10's commitment to promote honesty, integrity and high ethical standards in the work environment and to comply with all applicable Federal and State standards as well as other legal and ethical obligations. The standards not only address compliance with statutes and regulations, but also set forth broad principles that guide employees. Region 10 personnel are expected to be familiar with and are obligated to adhere to the standards set forth in this Code of Conduct or incorporated by reference herein and in Region 10 policies.

Region 10 is committed to conducting its business in a manner that facilitates quality, efficiency, honesty, integrity, confidentiality, respect and full compliance with applicable laws and regulations. In order to achieve this goal, Region 10 recognizes that it must require its staff to maintain a standard of behavior that is both lawful and ethical. Accordingly, Region 10 PIHP:

- Staff will be informed and educated about the applicable laws and requirements.
- Board members, administration, staff, participating CMHSP's and providers are expected to assume personal responsibility and accountability for understanding relevant laws, regulations and contract and grant requirements and for ensuring compliance.
- Management is committed to informing those under their supervision that they should comply with the applicable standards and, if they do not comply, appropriate disciplinary action will be taken.

WHEREAS, the Region 10 PIHP Board and its staff hold to the highest moral, legal, and professional standards for their conduct and services, and

WHEREAS, the Region 10 PIHP Board and its staff maintain respect both for the privacy and well-being of the persons served and for the welfare and protections of the general public, and

WHEREAS, the Region 10 PIHP Board strives to enhance the principles of competency, accountability, responsibility, non-discrimination and service excellence,

NOW BE IT RESOLVED...that the Region 10 PIHP Board and its staff voluntarily subscribe to and uphold the following principles:

OBLIGATION OF BOARD & PERSONNEL

Each individual is obligated to conduct themselves in accordance with:

- Standards set forth in this Code of Conduct.
- Applicable federal and state laws and regulations.
- Region 10 policies, including general policies, Corporate Compliance Program Plan and Policies, and those applicable to specific job, position, or function.
- Standards of conduct incumbent upon an individual by virtue of holding state licensure or registration.
- Ethical standards binding on an individual as a practitioner of a particular profession.

MISSION, VISION & VALUES

Mission Statement: Promoting opportunities for Recovery, Discovery, Health and Independence for individuals receiving services through ease of access, high quality of care and best value.

To actualize its Mission, the Region that includes Genesee, Lapeer, Sanilac and St. Clair counties embraces the following Vision Statements:

- Foster an improved quality of life for the individuals and families we serve by facilitating equal access to superior, integrated, trauma-informed supports and services, designed to promote choice and responsibility which are tailored to the strengths and needs of each individual.
- Provide hope, by recognizing and respecting each individual's unique self and their choices in pursuit of their life goals.
- Promote efforts to reduce stigma by empowering families and communities to learn, support, respect, and advocate for individuals recovering from behavioral health including substance use disorders and physical health challenges.
- Utilize innovative, evidence based, person-centered practices that provide positive outcomes and a high quality of life that includes integration and involvement in one's community. Effectively plan, evaluate and monitor a flexible system which is fiscally accountable.
- Demand a high standard of excellence in the management and delivery of services. Support a network which includes experiential, knowledgeable and dedicated and caring staff promoting synergy among stakeholders by embracing collaborative efforts.
- Maintain the community partnerships and relationships established long ago and recognize how those partnerships serve the community at large.

To achieve our Mission and Vision we embrace the following values:

- Treat all people with dignity, respect, fairness, and equality with an expectation of growth, development, recovery and discovery.
- Be sensitive to the diverse cultural, ethnic and spiritual needs of the individuals we serve.
- Provide person-centered and personalized services that ensure seamless coordination of care.
- Communicate clearly and concisely in the language of the individuals we serve.
- Innovatively and creatively develop better methods of supporting and serving individuals.
- Be responsible stewards, practicing both fiscal and performance accountability to all stakeholders.
- Develop partnerships with and among all stakeholders.
- Encourage teamwork and participation among everyone affiliated with the agency, recognizing that creative insight into improving how we serve and support people may originate at any level, both within and without the agency.
- Embrace continuous improvement, monitoring, and when necessary modifying policies, procedures and practices.
- Create and maintain a healthy, safe and productive work environment that promotes effective communication, advances innovation and rewards exemplary performance.

CORPORATE COMPLIANCE

Region 10 maintains a Corporate Compliance Program with a purpose of providing quality care for all the individuals it serves by acting as an internal control and encouraging services that are provided by persons acting in good faith, with a duty of care and safety to its customers, and promotes honesty, integrity and high ethical standards. Region 10 maintains policies and procedures which further this commitment and address matters related to the Federal False Claims Act (1863), the Michigan Medicaid False Claims Act (1977), the Anti-Kickback Statue, the Health Insurance Portability & Accountability Act (HIPAA), the Balanced Budget Act (1996), the Deficit Reduction Act (Medicaid Integrity Program) (2006), as well as any other circumstance in which the potential for or actual occurrence of Medicaid fraud, waste or abuse is involved.

This Code of Conduct is an integral part of Region 10's Corporate Compliance Program.

STANDARDS OF CONDUCT

Region 10 expects that all employees conduct themselves in a professional and ethical manner. No employee may conduct business in a manner that is unethical in any way, nor should an employee influence any other employee to act unethically. Employees are expected to treat everyone, whether colleagues or customers, with courtesy, respect and dignity and should be evident in their speech, appearance, manner, attitude and behavior. All employees are to report any dishonest activities or damaging conduct to the CEO or authorized designee.

SAFETY

Safety of Region 10 employees and visitors, in our office, is of the utmost importance. Each employee is expected to work diligently to maintain safe and healthful working conditions, and to adhere to all practices and procedures designed to prevent injuries and illness. By working together and staying aware of our surroundings, we can achieve a safe and healthy environment. Each employee is responsible for being aware of best safety practices, thinking defensively, anticipating unsafe situations, and reporting unsafe conditions immediately. Employees will not be penalized in any way for reporting unsafe working conditions.

CONFIDENTIALITY

Region 10 requires that employees do not disclose information held to be confidential by Region 10 under the Health Insurance Portability and Accountability Act (HIPAA), the Michigan Mental Health Code, or other state or federal regulations. Region 10 is committed to protecting the privacy of the persons served through its provider network and shall strictly govern the disclosure of any information to anyone other than those authorized. Any employee who engages in unauthorized disclosure of confidential or protected information is subject to disciplinary action which may result in termination. To ensure that all protected information remains confidential, employees are required to comply with all confidentiality policies and procedures in effect, specifically to include the HIPAA Privacy regulations outlined in the Region 10 Corporate Compliance Plan and Region 10 Information Management policies.

CONFLICT OF INTEREST

Region 10 requires that employees not compromise the agency, its stakeholders or partners for personal gain. This includes any situation in which financial or other personal considerations may compromise or appear to compromise (1) an employee's business judgment; (2) delivery of patient care; or (3) ability for an employee to do his or her job. Actual or potential conflicts of interest of PIHP staff must be disclosed to the PIHP Board, appropriate PIHP management personnel, human resources or the PIHP's Corporate Compliance Officer. Failure to do so may result in disciplinary action, up to and including termination.

REPORTING

Regard for the integrity of Region 10's funding services will be maintained. Region 10 Board and employees shall report any suspected or actual fraud, abuse or waste of any funds, including Medicaid funds, or other suspected illegal activity to the Chief Compliance Officer.

In the event that an employee becomes aware or believes that another employee's behavior or actions are inappropriate, illegal, problematic, or in any way inhibit or affect the organization's or the employee's performance or the Region 10's work environment, the conduct or behavior should be reported to the CEO or authorized designee. Employees should not discuss such actions or behavior with others. Discussion about such

matters may create an unacceptable work environment for which the involved employee will be held responsible and may be disciplined in accordance with Region 10’s disciplinary policy.

All reasonable concerns will be promptly, thoroughly, and confidentially investigated by Region 10. Where appropriate, corrective action will be taken. Region 10 upholds a non-retaliation approach for any individual who reports a concern, and the rights and interests of the reporting staff shall be protected. You are protected if you make a complaint. Whistleblower provisions provide protection to employees who report a violation or suspected violation of state, local, or federal law; it provides protection to employees who participate in hearings, investigations, legislative inquires, or court actions, and prescribes awards, remedies, and penalties.

Privacy Officer

Lauren Campbell, Quality Manager

Security Officer

Laurie Story-Walker, Data Manager

Corporate Compliance Officer

Kristen Potthoff, Administrative Director

BE IT FURTHER RESOLVED...that this Code of Ethics be reviewed by the Board of Directors for the information and guidance of Board members and staff. All new Board members and staff will be advised in writing of this code upon entering their duties and that this code shall be reviewed with them.

Adopted by the PIHP Board of Directors initially (2018).

Date	Action	Committee	Description
12/2018	<i>Adopted</i>	<i>PIHP Board of Directors</i>	<i>Initial approval.</i>
01/2020	<i>Reviewed</i>	<i>PIHP Management Team</i>	<i>Reviewed. No revisions required.</i>
01/2021	<i>Reviewed</i>	<i>PIHP Management Team</i>	<i>Reviewed. No revisions required.</i>
01/2022	<i>Reviewed</i>	<i>PIHP Management Team</i>	<i>Reviewed. No revisions required.</i>
12/2022	<i>Reviewed</i>	<i>PIHP Management Team</i>	<i>Reviewed. Updates to Privacy, Security, and Corporate Compliance Officer contact information.</i>
12/2023	<i>Reviewed</i>	<i>PIHP Management Team</i>	<i>Reviewed. Updates to Privacy Officer contact information.</i>