



Code of Conduct

ExpertCare is dedicated to maintaining excellence and integrity in all aspects of its operations and its professional and business conduct. One of the fundamental principles on which ExpertCare conducts its business is full compliance with applicable laws. ExpertCare's core value "Do the right thing" underscores the importance placed on sound ethical standards. This Code of Conduct is our blueprint to "Doing *the right thing*". It provides the guiding standards for our decisions and actions. Although the Code of Conduct can neither cover every situation in the daily business of ExpertCare's many varied activities nor substitute for common sense, individual judgment or personal integrity, it is the duty of each member of our community to adhere, without exception, to the principles set forth herein. One of ExpertCare's strongest assets is a reputation for integrity and honesty. The owner and all employees shall act in compliance with applicable law and this Code and in a sound ethical manner when conducting business and operations.

Obligations of ExpertCare employees

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;
- ExpertCare policies, including general policies and those applicable to specific job, position or function.

Written Ethical Codes of Conduct

Business and Marketing Ethics

The owner and all employees shall act in compliance with applicable law and this Code and in a sound ethical manner when conducting business and operations.

- ExpertCare will market its professional services to clients and third-party payers on the basis of quality and cost-effectiveness. ExpertCare will not offer or give anything of value to induce a potential client or referral source to use ExpertCare services.
- Each supervisor and manager is responsible for ensuring that the employees within their supervision are acting ethically and in compliance with applicable law and the Code. All employees are responsible for acquiring sufficient knowledge to recognize potential compliance issues applicable to their duties and for appropriately seeking advice regarding such issues.
- All employees are given copies of the Code, which sets forth standards applicable to all business and operations, at the time they are hired. Each employee signs a receipt indicating they have received, read and will abide by the organization's standards of conduct.
 - In addition there are a number of more detailed policies covering particular business units or subject matters. ExpertCare will communicate those specific policies to employees who are affected by and who must comply with them in the course of ExpertCare's business. A current set of such policies is available at ExpertCare's office.
- Federal and state law prohibit ExpertCare from contributing to political candidates or political parties. We are prohibited from using funds, facilities, or other ExpertCare assets to support, either directly or indirectly, any

political candidate or political party. This prohibition includes using employee time, office supplies, food services, and purchases of prizes for fundraisers.

- ExpertCare will not participate in or support any political campaign on behalf of (or in opposition to) any candidate for public office. Employees must not associate ExpertCare with or imply ExpertCare's endorsement of any personal political activity.
- ExpertCare will adhere to our purpose of providing care to our community. We aspire to be cost-effective while not sacrificing the quality or appropriate level of care for financial reasons. Additionally, ExpertCare maintains high ethical standards in the provision of care.
- ExpertCare will enforce its strict alcohol and drug free workplace policy.
- All employees will be trained in HIPAA and protected health information (PHI) at the time of hire. Employees will follow the letter and spirit of HIPAA and only discuss PHI with those who are entitled to the information.
- ExpertCare will safeguard electronic and paper records containing PHI or other confidential information using the guidelines set forth in HIPAA.
- ExpertCare will not engage in conduct prohibited by the antitrust laws including monopolistic behavior or price-fixing.
- All books, records, and documentation of ExpertCare will be kept accurately and on a timely basis. This includes all documents including but not limited to consumer medical charts, billing documents, and invoices.
- All employees will follow safe work practices and comply with all applicable safety standards and health regulations.

Service Delivery

(Conflicts of interest, exchange of gifts/money, personal fund raising, personal property, boundaries and witnessing of legal documents)

- ExpertCare employees will conduct their business affairs in such a manner and with such ethics and integrity that no conflict of interest, real or implied, could exist. Employees will avoid developing a personal relationship with an employee, vendor, shareholder, or customer that will interfere with his/her impartial judgment in ExpertCare's business matters. Employees will make full disclosure to their immediate supervisor and business division manager of any situation that may appear to be a potential conflict of interest.
- Each employee will create an atmosphere of gentleness. No employee will use physical management. If after attempts to de-escalate a situation, a client is in immediate danger of hurting himself/herself or others, the employee will use no more force than necessary to prevent the client from harming himself/herself or others.
- ExpertCare employees shall not accept money, goods, services, or other non-monetary remuneration, except for service fees paid to ExpertCare, from consumers in exchange for services.
- ExpertCare employees shall not except gratuities for services provided.
- ExpertCare employees shall not knowingly enter social relationships, including romantic and sexual encounters, or business transactions with consumers.
- ExpertCare prohibits personnel from soliciting funds on behalf of a personal cause, having persons served selling items on behalf of the organization, allowing persons served to raise funds by appeals to personnel or other persons served.
- ExpertCare employees may offer, give or accept a non-monetary gift of a nominal value from or for a client or a client's family member, only if in compliance with applicable law, standards of care, and ethical obligations. Employees will not accept gifts, favors, services, entertainment or other things of value to the extent that decision-making or actions affecting ExpertCare may be influenced. Employees must not solicit, demand, or accept from company suppliers, vendors or clients:

- Cash
- Gift Card and/or Certificate of any value
- The owner, directors or employees shall not seek remuneration in any form from any contractors, suppliers, providers or other health care entities that seek to do business with it. Nor will they accept remuneration of any kind when providing or accepting referrals.
- ExpertCare will treat the consumer, the consumer's family and the consumer's assets and property with respect and demand that others will do the same. All employees must be trained in Recipient Rights from a certified organization. Employees are also trained in ExpertCare's written policies regarding Recipient Rights based on the Michigan Mental Health Code Act 258 of 1974 section 330.1752 and must follow these policies.
- ExpertCare employees will not sign as a witness on Client Legal Documents. The responsibility for providing a witness to these documents rests with the individual who requires the witness. Legal documents include but are not limited to: powers of attorney, Guardianship, wills and advance directives.

Professional Responsibilities

ExpertCare employees shall respect the privacy of consumers and abide by the policies pertaining to recipient confidentiality.

- ExpertCare employees shall not disclose written or oral information specific to identifiable consumers and service to such consumers in unauthorized areas, which shall include, but are not limited to, the following:
 - Lobbies and waiting rooms
 - Hallways, stairways and elevators
 - Bathrooms
 - Eating/lounging/smoking areas
 - Walkways, parking lots, picnic areas, etc. and
 - Any area in which privacy is not ensured or cannot be provided.
- ExpertCare employees shall discuss the provision of services or status of cases regarding identifiable consumers only for business purposes and only with parties directly and professionally concerned with them.
- If, in any social or casual setting away from a direct or contract service site, any ExpertCare employees encounter a consumer of ExpertCare services, he/she shall not indicate that they are acquainted with the consumer through ExpertCare. If possible, the employee shall inform the consumer of any impending circumstances which are likely to affect the consumer's confidentiality; i.e., cause the consumer to explain how he/she knows the employee.
- Written or oral recipient information disseminated to a recipient, a staff member, or an individual ExpertCare contractor shall be conducted in such facility areas which assure its confidentiality from other consumers or staff who do not possess a need to know basis for sharing the information.
- Doors, windows, etc. shall be shut if, when open, orally disclosed information could be heard by unauthorized persons.
- Written disclosed information shall not be left outside of a file cabinet when it is easily accessible to unauthorized persons, i.e., on an unattended counter, on a desk in an unlocked room, near a copying machine, etc.
- If the disclosure of information takes place in a room with glass walls, the consumer information shall not be displayed on a chalkboard, bulletin board, or near the glass if doing so would make it visible to unauthorized persons.
- Computer terminal screens shall be positioned so that confidential information shall not be visible to persons in the waiting areas.

Human Resources

- ExpertCare ensures that the work environment is free of discrimination or harassment due to age, race, gender, color, religion, national origin, physical or mental disability, sexual orientation, height, weight, pregnancy, childbirth or related condition, familial status, marital status, genetic information or covered veteran status. Any form of sexual harassment, including the creation of a hostile work environment, is completely prohibited.
- Each ExpertCare employee shall not discriminate against, harass, or deny treatment or services to any consumer because of his/her race, color, religion, gender, national origin, marital status, age, political affiliation, disability, known association or relationship with an individual with a disability, other legally protected status, or socioeconomic status.

Prohibition of Waste, Fraud, Abuse and Other Wrongdoing

- ExpertCare employees shall follow the law in regards to proper billing for Medicaid, Medicare and 3rd party insurance.
- ExpertCare employees will not knowingly commit waste, fraud or abuse or conspire with any other person to commit waste, fraud or abuse.
- ExpertCare employees are trained on the meaning of waste, fraud and abuse. The training includes the steps ExpertCare takes to investigate suspicions or allegations of these. The training also includes ExpertCare's no tolerance policy and the policy to turn evidence of waste, fraud or abuse to the Office of the Inspector General.
- ExpertCare employees are expected to "do the right thing" and not commit other acts that could be seen as wrongdoings in respect to the law, contractual obligations and ethical practices.

Advocacy and Corporate Citizenship

ExpertCare is actively involved in community organizations and service groups. We encourage our employees to volunteer their time to help others. ExpertCare serves on provider alliance committees that come together monthly to research and report on areas of compliance, legislation, concerns and other services that are relevant to providers servicing community mental health. Our goal is to find ways to provide the best service, with a high level of standard and provide advocacy for persons served. The legislative committee provides updates on current and pending legislation that could affect services. We encourage our clients and client families to attend a legislative forum each year as a means to advocate for services. If a client is dissatisfied with the amount of services they receive or feel their rights have been violated, ExpertCare staff provides the client with a resource they can go to file a complaint.

CODE OF CONDUCT ACKNOWLEDGEMENT FORM

I hereby acknowledge and affirm that I have read and reviewed the ExpertCare Management Services Code of Conduct. I understand the provisions of the Code of Conduct and was allowed to ask any questions I might have regarding the requirements.

I understand that it is a condition of my employment/contract to comply with the requirements of Code of Conduct. I have also been informed of the reporting procedures applicable to potential violations of federal law, state law, the compliance program or ExpertCare’s code of conduct. I understand that I not only must personally comply with federal law, state law, and code of conduct but that I also must report any potential violations I discover, witness or learn of in any manner. I also understand I will not be punished or disciplined for reporting, in good faith, any violation regardless of its seriousness or the level of individual involved in the violation.

I realize committing a violation or failing to report a potential violation may result in disciplinary action such as suspension, reduction in pay, demotion with corresponding pay reduction, or termination of employment/contract.

I certify that I have not been excluded from participation in any federal or state health care program. I have not been criminally convicted of any crime regarding the federal or state health care programs or private health care plans or any offense involving financial misconduct (such as fraud, embezzlement or bribery).

Employee Name (Please Print)

Date

Employee's Signature

Witness Name (Please Print)

Date

Witness Signature