



Caring for All of You

Code of Conduct

**Revised and Approved
03/05/2018**

PURPOSE

The purpose of the Code of Conduct is to establish the scope, responsibilities, operational guidelines, controls and activities used by Community Partners, Inc. and its subsidiaries, (hereinafter CPI) to foster ethical conduct throughout its own and its providers' operations; and to confirm that CPI upholds and supports proper compliance conduct and provides its workforce with specific ethical and compliance guidelines.

SCOPE

The CPI Code of Conduct applies to all CPI workforce members, including employees, volunteers, trainees, interns, agency temporaries and members of the Board of Directors.

ESTABLISHING EXCELLENCE

The single greatest source of advantage for any organization is its people. CPI strives to build an aligned and innovative team by providing the opportunity for everyone to do meaningful and challenging work. People must be able to continuously develop their professional potential while contributing to significant achievements in collaboration with talented colleagues.

The CPI workforce has an obligation to act in ways that will merit the trust, confidence and respect of the health care profession, community stakeholders and the general public. Therefore, the CPI workforce should lead professional lives that embody an exemplary system of values and ethics.

In fulfilling their commitments and obligations to community stakeholders, CPI workforce members function as advocates. Every management decision affects the health and well-being of both individuals and communities. CPI workforce members must carefully evaluate the possible outcomes of their decisions. As with all organizations involved in the provision of health care services, CPI workforce members must work to safeguard and foster the rights, interests and prerogatives of the people they serve. The role of the advocate requires that CPI workforce members speak out and take actions necessary to promote such rights, interests and prerogatives if these are threatened. CPI workforce members have ethical responsibilities to every stakeholder in the health care constituency, a fundamental principle that holds true for every individual in the CPI workforce. CPI workforce members must hold themselves accountable, individually and as an organization, for the integrity of their decisions and actions.

The Code of Conduct builds on the organization's commitment to an ethical work environment. It highlights standards of proper legal, ethical and professional behavior and describes how any legal, ethical or quality concern can be communicated so it can be swiftly resolved. The Code of Conduct is not meant to cover every possible situation, but to serve as a guide. Workforce members are referred to their supervisors, internal operating policies and procedures for further guidance. Workforce members must exercise their good judgment and abide by the standards of their chosen profession. Each member of the CPI workforce is a vital link in ensuring the integrity of CPI. The CPI commitment to excellence is the foundation of the organization and the strength that makes it successful.

OUR FUNDAMENTAL COMMITMENTS

To our workforce members: CPI is committed to a work culture and environment that treats all workforce members with fairness, dignity, and respect, and affords them an opportunity to grow,

to develop professionally, and to work in a team environment where all ideas are considered.

To our clients: CPI is committed to quality health care that is sensitive, compassionate, promptly delivered, and grounded in the affirmations of self-determination, recovery and choice.

To our client families and caregivers: CPI is committed to the full and integral incorporation of client families, caregivers and other natural supports as part of each client's movement toward recovery. CPI acknowledges and advances the inclusion of clients' innate and adopted cultures and upholds the diversity of these systems.

To our business associates: CPI is committed to fair competition among prospective business associates and vendors and the sense of responsibility required of a good customer.

To our community collaborators: CPI is committed to understanding the particular needs of the communities served and bridging identified gaps with focused health services that are client and family driven, recovery-oriented, respectful of cultural differences and that foster hope and determination. CPI recognizes a commitment to education and support for events that promote collaboration and diversity.

To our funding and regulatory entities: CPI is committed to an environment in which compliance with rules, regulations and sound business practices is woven into the corporate culture. CPI accepts the responsibility to aggressively self-govern and monitor adherence to the requirements of law, regulation, contractual requirements and our Code of Conduct.

PROFESSIONAL EXCELLENCE

Workforce members

While all CPI workforce members are obligated to follow the Code of Conduct, CPI leaders set the example and are, in every respect, a model for other employees. They must ensure that those on their teams have sufficient information to comply with laws, regulations, and policies, as well as the resources to resolve ethical dilemmas. They must help create a culture within CPI that promotes the highest standards of ethics and compliance. This culture must encourage all CPI workforce members to share concerns when they arise.

In the normal day-to-day functions of CPI, there are issues that occur that relate to how people in the organization deal with one another. It is impossible to foresee all of these, and many do not require explicit treatment in a document like this. A few routinely arise, however, and this document addresses these circumstances.

Equal Opportunity

CPI workforce members provide a wide complement of talents that contribute greatly to organizational success. CPI is committed to providing an equal opportunity work environment where everyone is treated with fairness, dignity and respect. CPI complies with all laws, regulations, and policies related to non-discrimination in personnel actions. Such actions include recruitment, hiring, workforce reductions, transfers, terminations, performance evaluations, training, compensation, corrective action, and promotions.

Freedom from Harassment

Each CPI workforce member has the right to work in an environment free of harassment. Harassment based on diverse characteristics or cultural backgrounds is not tolerated and any form of sexual harassment is strictly prohibited. Harassment also includes workplace violence in the form of robbery or other commercial crimes, stalking, and violence directed at CPI. Any CPI

workforce member who observes or experiences any form of harassment is responsible for reporting the incident. *First*, workforce members should speak with their supervisor. If speaking with an immediate supervisor is not possible or the conduct pertains to the immediate supervisor, workforce members should speak with the supervisor's supervisor, another member of the CPI management team or contact Human Resources.

Alcohol and Drug Free Environment

To protect the interests of colleagues and clients, CPI is committed to an alcohol and drug-free work environment. All workforce members must report for work free of the influence of alcohol and illegal drugs.

Conflict of Interest

A conflict of interest may occur if a workforce member's outside activities or personal interests influence or appear to influence his/her ability to make objective decisions in the course of performing job responsibilities. A conflict of interest may also exist if the demands of any outside activities hinder or distract workforce members from the performance of their jobs or cause them to use CPI resources for other than CPI purposes. It is the personal obligation of each CPI workforce member to ensure that he/she remains free of conflicts of interest in the performance of his/her responsibilities at CPI. If a workforce member encounters any question about whether an outside activity might constitute a conflict of interest, consultation with and approval by the Executive Management Team is required before pursuing the activity.

Multiple/Dual Relationship/Peer Specialists

CPI Workforce members shall make every effort to avoid multiple relationships with a client. When a dual relationship is unavoidable, workforce members shall take extra care so that professional judgment is not impaired and there is no risk of client exploitation. Such relationships include, but are not limited to, members of their immediate or extended family, their business associates, or individuals with whom they have a close personal relationship or with whom their family has a personal relationship. When extending these boundaries, CPI workforce members will take appropriate professional precautions such as informed consent, consultation, supervision, and documentation to ensure that their judgment is not impaired and no harm occurs. Consultation and supervision shall be documented.

Peer Specialists will avoid relationships or commitments that conflict with the interests of individuals they serve, impair professional judgment, imply a conflict of interest, or create risk of harm to individuals they serve. When dual relationships are unavoidable, it is the responsibility of the Peer Specialist to conduct himself/herself in a way that does not jeopardize the integrity of the helping relationship. Peer Specialists will never engage in romantic or sexual/intimate activities with the individuals they serve. Peer Specialists will not provide services to individuals with whom they have had a prior romantic or sexual relationship.

Excluded Parties

The US Department of Health and Human Services under the Office of the Inspector General can exclude or prevent individuals or entities from participating in Medicare, Medicaid, and other federal health care programs. Exclusion means that no program payments will be made for items or services furnished, ordered, or prescribed by the excluded individual or entity. The prohibition against federal program payment for items or services furnished by excluded individuals or entities also extends to payment for administrative and management services that are not directly related to patient care but are necessary components of providing items and services to federal program beneficiaries. CPI workforce members must not be excluded in this manner.

Community Collaborators

Competitive Procurement

CPI maintains the highest standards of integrity and objectivity in dealing with providers, contractors, consultants, and vendors. CPI manages these relationships in a fair and reasonable manner, consistent with all applicable laws and good business practices. CPI promotes competitive procurement. CPI source selection and determination of contract awards are made on the basis of objective criteria including quality, technical excellence, price, delivery, adherence to schedules, and maintenance of adequate resources for optimal service. Decisions are made on the party's ability to meet the needs of CPI and not on personal relationships and friendships.

Gifts and Gratuities

CPI workforce members are prohibited from accepting or giving gifts or gratuities beyond common business courtesies of nominal value. Under no circumstances do workforce members accept gifts, meals, or food items provided or supplied by a pharmaceutical organization or representative.

Marketing

CPI will advertise to inform the community of the availability and value of its services and products and provide educational information about mental health and substance abuse issues. CPI is perceived as a reliable, authoritative source of information about services provided to individuals with mental health and substance needs. CPI remains mindful of the trust the public places on CPI to provide accurate, balanced information. Advertising will be honest and accurate and, when presenting views on issues, clearly distinguish opinion from factual data. Advertising will never disparage or caricature competitors or other groups.

Funding and Regulatory Entities

CPI takes great care to assure all billings to government payors, commercial insurance payors and clients are true and accurate and conform to all pertinent federal and state laws and regulations. CPI provides workforce members with the information and education they need to comply fully with all applicable laws, regulations and conditions of participation. CPI prohibits any workforce member or provider from knowingly presenting or causing to be presented claims for payment or approval which are false or fraudulent. CPI is forthright in dealing with any billing inquiries. Requests for information are answered with complete, factual, and accurate information. CPI cooperates with and is courteous to all surveyors and auditors and provides them with the information to which they are entitled.

CARE EXCELLENCE

Clients

Rights

In promotion and protection of clients' rights, each client and his/her personal representative will be afforded appropriate confidentiality, privacy, security and protective services, opportunity for resolution of complaints, and services in the most community-integrated environment. Clients are treated in a manner that preserves their dignity, autonomy, self-determination and self-esteem, civil rights, and involvement in their own journey of recovery.

Clients receiving healthcare services have clearly defined rights. To honor and uphold these rights, the CPI workforce must:

- Protect all clients from physical, emotional, verbal or sexual abuse, neglect or exploitation.
- Protect all aspects of client privacy and confidentiality.
- Obtain written authorization from clients or their legal representatives before

disclosing personal, financial or medical information to anyone outside the CPI network, unless otherwise permitted by law.

- Limit access to clients' protected health information to CPI workforce members who need such information to perform their jobs.
- Respect the right of clients and their legal representatives to participate in decisions about their care and to be provided with adequate information to make informed decisions.
- Respect the right of clients and their legal representatives to access and/or amend their medical records as requested.
- Recognize that clients have the right to consent to or refuse care.
- Protect the right of clients to be free from physical or chemical restraints.

In the promotion and protection of each client's rights, each client is afforded appropriate confidentiality, privacy, security and protective services, opportunity for resolution of complaints and pastoral or spiritual care.

Protected Health Information

CPI collects information about clients to provide quality care. CPI realizes the sensitive nature of this information and is committed to maintaining its confidentiality. CPI does not disclose protected health information to others unless it is necessary to serve the client or is required by law. CPI workforce members must never disclose protected health information if such action violates the privacy rights of our clients. CPI workforce members are only given access to the minimum necessary protected health information to perform their duty assignments.

Non-Discrimination

CPI treats all clients with respect and dignity and provides services that are requested, necessary and appropriate. CPI makes no distinction in the enrollment, oversight, or disenrollment of clients or in the services provided based on age, gender, disability, race, sexual preference, color, religion, or national origin. CPI preserves the integrity of clinical decision-making by requiring that its providers base care and service decisions on the bio-psychosocial needs of each individual client and not on financial considerations. Program eligibility may limit the types of services which are available; however, CPI makes every effort to ensure clients are served as fully as funding sources permit.

INTEGRITY CONCERNS

CPI has a specific communication and reporting process for compliance issues. Workforce members should use this process whenever there is a concern or question. It is important that individuals seek answers until all questions are answered. CPI workforce members are required to report actual or potential wrongdoing observed or suspected. Reports may involve possible violations of law, regulations, policies and procedures, or the Code of Conduct.

Course of Action

First, workforce members should speak with their supervisor. CPI supervisors have important information related to the laws, regulations, and policies that relate to specific work areas and functions. If speaking with an immediate supervisor is not possible or the conduct pertains to the immediate supervisor, workforce members should speak with the supervisor's supervisor, another client of the CPI management team or contact Human Resources. If concerns still exist, or if preferred, any workforce client may call the **Compliance Hotline** at **(800) 690-9871** for assistance. All calls are confidential and may be made anonymously.

The Fraud and Abuse Hotline is available 24 hours per day, seven days per week, to report any legitimate concern about legal, ethical or quality issues. A report should be made of any observed or suspected activity that could harm a client or the agency, or which could damage CPI's reputation of ethical business practices. Callers to the Fraud and Abuse Hotline are not required to leave a name, however they must provide enough information to begin the

investigation process. During this investigation, confidentiality is maintained to the fullest extent possible. A report may be made in good faith to the Fraud and Abuse Hotline without fear of reprisal or retaliation. Anyone, including a supervisor, who retaliates against a workforce member for contacting the Hotline, is subject to discipline, up to and including termination.

Other avenues for reporting suspected fraud or abuse may be directed to the following:

ADHS/DBHS

Bureau of Corporate Compliance (866) 569-4927
reportfraud@azdhs.gov

AHCCCS

Office of Inspector General (888) 487-6686
AHCCCSFraud@azahcccs.gov

Medicare/Medicaid

Department of Health and Human Services Office of the Inspector General
(800) 447-8477

Reports and/or complaints regarding licensed providers may be directed to one of the following:

Arizona Board of Accountancy

Attn: Enforcement Division
100 North 15th Avenue, Ste 165
Phoenix, AZ 85007
(602) 364-0804

Arizona Board of Behavioral Health Examiners

1400 West Washington Street Phoenix, AZ 85007
(602) 542-1882

Arizona Board of Nursing

4747 North 7th Street, Ste 200
Phoenix, AZ 85014
(602) 771-7800
(602) 771-7888 (fax)

Arizona Board of Osteopathic Examiners in Medicine and Surgery

9535 E Doubletree Ranch Road Scottsdale, AZ 85258
(480) 657-7703
(480) 657-7715 (fax)
www.azdo.gov questions@azdo.gov

Arizona Board of Psychologist Examiners

1400 W Washington St., Ste 235
Phoenix, AZ 85007
(602) 542-8162
(602) 542-8279 (fax)

Arizona Medical Board

9545 East Doubletree Ranch Road Scottsdale, AZ 85258
(877) 255-2212
(480) 551-2702 (fax)

Arizona Regulatory Board of Physician Assistants

9545 East Doubletree Ranch Road Scottsdale Arizona 85258
480-551-2700

Office of Medical Facilities Licensing

Division of Licensing
150 North 18th Avenue, Fourth Floor Phoenix, AZ 85007
(602) 364-3030
(602) 364-4764 (fax)

Bureau of Residential Facilities Licensing

Division of Licensing
150 North 18th Avenue, Suite 410
Phoenix, AZ 85007
(602) 364-2639
(602) 324-5872 (Fax)

Tucson Office

400 W. Congress, Suite 100
Tucson, AZ 85701
(520) 628-6965
(520) 628-6991 (Fax)