

Compliance and Ethics

The NorthCare Compliance Plan documents NorthCare's approach to assuring that federal and state regulatory and contractual obligations related to compliance of the Prepaid Inpatient Health Plan (PIHP) are fulfilled. It addresses NorthCare's regulatory compliance obligations and how, where it has obligations, it will oversee the PIHP administrative functions it delegates to the Member Community Mental Health Service Providers (CMHSP).

NorthCare pledges to comply with applicable laws, promote quality performance throughout the NorthCare Network, and maintain a working environment that promotes honesty, integrity and high ethical standards.

The Compliance Program is an essential part of NorthCare's mission and incorporates the seven elements of an effective compliance program.

All NorthCare Personnel and Network Providers are expected to report any activity he or she reasonably believes is in violation of the law, ethical standards or NorthCare policies. An individual need not be certain that the violation has occurred in order to report it. Reporting enables the Compliance Officer to ensure potential problems are investigated quickly and to take prompt action to resolve them.

Under no circumstances is retaliation for submitting a compliance issue or inquiry acceptable. Any covered party reporting suspected fraud, waste, or abuse is protected under the Whistleblowers' Protection Act 469 of 1980. All reports of wrongdoing will be evaluated promptly, thoroughly, and fairly by persons having sufficient level of expertise and knowledge with regard to the issue presented by the reporter.

Reports may be made directly to NorthCare's Compliance Officer by:

1. Calling: (906) 226-0043 (voice messages are confidential)
2. Emailing: dbennett@northcarenetwork.org
3. Mailing: NorthCare Network, Attn: Compliance Officer,
200 W. Spring Street, Suite 2, Marquette MI 49855

Any individual who wishes to remain anonymous may use NorthCare's confidential Compliance Helpline to report compliance-related issues or concerns via:

1. Call: (844) 260-0003 (*Toll Free*)
2. Website: <http://www.lighthouse-services.com/northcare>
3. Email: reports@lighthouse-services.com
4. Fax: (215) 689-3885

(Please inform that you wish to report to NorthCare Network in your email or fax.)

All reports will be handled as confidentially as practical and/or as allowed by law.