

NORTHCARE NETWORK

POLICY TITLE: Code of Conduct Distribution & Training	CATEGORY: Compliance	
EFFECTIVE DATE: 3/21/13	BOARD APPROVAL DATE: 3/21/13	
REVIEW DATE: 1/24/25	REVISION(S) TO POLICY STATEMENT: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	OTHER REVISION(S): <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
RESPONSIBLE PARTY: Compliance/Privacy Officer and HR Specialist	CEO APPROVAL DATE: 2/4/25 Megan Rooney, CEO	

APPLIES TO

NorthCare Network Personnel

POLICY

It is the policy of NorthCare Network that all personnel receive a copy of NorthCare Network's Code of Conduct setting forth general ethical standards applicable to all personnel and NorthCare Network operations. It is the responsibility of each supervisor to ensure that the personnel within their supervision are aware of and are acting ethically and in compliance with applicable laws and the Code of Conduct. Accordingly, all personnel are required to familiarize themselves with the Code of Conduct and Compliance Program and to return a signed attestation within thirty (30) days of employment.

PURPOSE

The purpose is to articulate NorthCare Network's expectations and procedures related to the Code of Conduct. Specifically, how it is distributed, and training required ensuring all Personnel understand the Code of Conduct.

DEFINITIONS

1. ***NorthCare Network Personnel:*** refers to personnel employed by NorthCare Network on a full or part-time basis, students, volunteers, interns, and Board Members.

REFERENCES

- Balanced Budget Act, 438.608
- MDHHS/PIHP Contract
- NorthCare Network Code of Conduct
- Code of Conduct and Conflict of Interest Attestation

HISTORY

REVISION DATE: 7/27/16, 5/16/17, 8/23/21, 5/3/23, 1/24/25

REVIEW DATE: 3/13/13, 11/5/14, 9/16/15, 7/27/16, 5/16/17, 3/13/18, 1/22/19, 12/3/19, 10/21/20, 8/23/21, 6/10/22, 5/3/23, 1/24/25

CEO APPROVAL DATE: 3/13/13, 11/5/14, 10/6/15, 8/2/16, 6/6/17, 3/27/17, 3/13/18, 1/22/19, 1/7/20, 11/3/20, 9/7/21, 7/12/22, 6/5/23, 2/4/25

BOARD APPROVAL DATE: 3/21/13

PROCEDURES

- A. The Compliance and Privacy Officer and/or HR Specialist will review and provide a copy of the Code of Conduct to all new personnel within 30 days of his/her employment/contract/involvement with NorthCare Network.
- B. The HR Specialist will ensure the Code of Conduct and Conflict of Interest Attestation is signed and filed in the employee's personnel file.
- C. The Compliance and Privacy Officer will provide updated training annually for all NorthCare Network personnel.