

NorthCare Network CODE OF CONDUCT- FY25

The Code of Conduct serves as a foundational document that details the fundamental principles, values, and framework for action within NorthCare Network's compliance program. The standards not only address compliance with statutes and regulations but also set forth broad principles that guide employees in conducting business professionally and ethically. The standards included in the Code of Conduct will promote integrity, support objectivity and foster trust. We believe this is essential in protecting our consumers and the integrity of our publicly funded programs. Therefore, NorthCare requires all employees, board members, students, volunteers, and interns, (hereinafter referred to as "Personnel") and independent contractors and subcontractors to abide by sound ethical practices and the highest standards of integrity in the conduct of business.

NorthCare Network 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. To achieve this goal, NorthCare Network requires its Personnel to maintain a standard of behavior that is both lawful and ethical. Accordingly,

- NorthCare will advise and train its staff about the applicable laws and requirements.
- NorthCare will share these standards with new employees and board members and require annual review.
- NorthCare Personnel are expected to assume personal responsibility and accountability for understanding relevant laws, regulations, contract, and grant requirements and for ensuring compliance.
- NorthCare Personnel conduct themselves in an ethical manner and report issues of noncompliance and potential fraud, waste, and abuse through appropriate channels.
- NorthCare management is committed to informing those under their supervision that they should comply with the applicable standards and, if they do not comply, management will take appropriate disciplinary action.

CONDUCT AND ETHICS

Professional Ethics: An employee who is a member of a health care profession required to be licensed, certified, or registered under the Michigan Public Health Code and Administrative Rules is responsible for obtaining his or her license, certification or registration and renewals ensuring there is no lapse. A health care professional shall render professional services only within the scope of his or her license, certification, or registration and in a manner that conforms to applicable standards of care and to the ethics of his or her profession. Employees are not permitted to render professional services unless he or she possesses all valid, current, and unrestricted (ex. suspended) state and federal licenses, registrations, or certifications necessary to legally practice his or her profession and has been credentialed and privileged as outlined in NorthCare policies.

Privacy and Confidentiality: NorthCare Network is committed to protecting the privacy of its consumers and shall strictly govern the access, use or disclosure of any information to anyone other than those authorized in the current published Privacy Notice. NorthCare Network must comply with federal and state privacy and security laws and to facilitate this NorthCare maintains policies to protect the confidentiality, integrity, and availability of Protected Health Information (PHI) and Personally Identifiable Information (PII) we create, maintain, transmit and receive. Failing to follow State and federal law (including HIPAA, the Michigan Mental Health Code, and 42 CFR Part 2) and/or NorthCare policies governing privacy and security will subject you to disciplinary action up to and including removal from the Board, termination of employment, or termination of the contract.

Conflict of Interest: To safeguard NorthCare Network's commitment to ethical and legal standards, Personnel shall avoid any action that conflicts with the interests of the organization and refrain from being influenced by personal considerations in the performance of their duties.

Accordingly, employees, students, volunteers, interns, or board members must disclose the existence and nature of any actual or potential conflict of interest to the Compliance & Privacy Officer and/or the Chief Executive Officer at the time of interview, or when a conflicting interest arises.

Outside Employment: NorthCare Personnel shall not represent or function as an agent of NorthCare, compensated or uncompensated, for any outside interest in any transaction in which NorthCare has a direct or substantial interest, financial or otherwise. Nor shall any employee accept any outside engagement or employment, the pursuit of which conflicts with the ability of the employee to discharge properly his or her duties to NorthCare. Outside employment shall be disclosed to and approved as defined in NorthCare Network's Outside Employment Policy.

BUSINESS ETHICS

Financial Standards: NorthCare shall ensure the integrity of all financial transactions. Transactions shall be executed in accordance with established policies and procedures and with federal and state law and recorded in conformity with generally accepted accounting principles or any other applicable criteria. All financial reports, accounting records, research reports, expense accounts, time sheets and other documents will accurately and clearly represent the relevant facts or the true nature of a transaction. No undisclosed or unrecorded funds or assets will be established for any purpose. NorthCare will not tolerate improper or fraudulent accounting, documentation, or financial reporting. NorthCare Network does not pay for referrals or consumers. Consumer referrals and admissions will be accepted based solely on the consumer's clinical needs and medical necessity and our ability to render the needed services. Eligible individuals with Medicaid will not be put on a wait list for services. NorthCare staff or any other person acting on behalf of the organization is prohibited from soliciting or receiving anything of value, directly or indirectly, in exchange for the referral of consumers.

Anti-Kickback Statute: The federal Anti-kickback Statute (section 1128B(b) of the Social Security Act) prohibits NorthCare Personnel from offering, paying, soliciting, or accepting money or anything of value as an enticement to generate business compensated by Medicare and Medicaid programs. All direct-to-consumer marketing activities require advance review by the Compliance Oversight and Risk Management Committee or designee if the activity involves giving anything of value directly to a consumer.

Gifts Influencing Decision-Making: NorthCare Personnel will not accept gifts, favors, services, entertainment, gratuities, or loans from any individual, firm, or corporation to the extent that decision-making or actions affecting NorthCare might be influenced. Nor is the offer or giving of money, services, or other things of value with the expectation of influencing the judgment or decision-making process of any purchaser, supplier, customer-member, government official or other person by any NorthCare Personnel or the agency be allowed.

If there are concerns regarding any staff's acceptance of gifts, the Compliance Oversight and Risk Management Committee or designee, shall make the final decision.

Gifts from Consumers/Members: NorthCare Personnel are prohibited from soliciting tips, personal gratuities or gifts from members or member families. Additionally, NorthCare Personnel are prohibited from accepting gifts or gratuities of more than nominal value. Perishable or consumable gifts, except for items of minimal value such as flowers, cookies, or candy from consumers and/or family members given to a department or group are not subject to any specific limitation. If a member or other individual wishes to present a monetary gift of more than nominal value, s/he should be referred to the Chief Executive Officer and follow protocols for charitable contributions.

NorthCare defines "nominal" value as \$25.00 per gift or less, with a \$300 maximum per year.

Purchasing and Supplies: It is the policy of NorthCare to ensure that all rental, lease, and purchasing agreements are structured in accordance with applicable federal and State self-referral and anti-kickback regulations as well as federal guidelines regarding tax-exempt organizations. All agreements must be commensurate with the fair market value for equipment or space.

All subcontractor and supplier arrangements will be managed in a fair and reasonable manner, consistent with all applicable laws and good business practices. Subcontractors, suppliers, and vendors will be selected based on objective criteria including quality, technical excellence, price, delivery, and adherence to schedules, services, and maintenance of adequate sources of supply. Purchasing decisions will be made on the supplier's ability to meet needs and not on personal relationships or friendships. NorthCare will always employ the highest ethical standards in business practices in source selection, negotiation, determination of contract awards, and the administration of purchasing activities.

Charitable Contributions: All charitable contributions must be made for the benefit of NorthCare Network and for the purpose of advancing NorthCare’s mission. The Chief Executive Officer will oversee all charitable contributions to ensure that they are administered in accordance with the donor’s intent. All checks and other documents must be made payable to NorthCare Network and given to the Finance Department to deposit into the appropriate account.

Billing, Claims and Encounter Reporting: NorthCare is committed to charging, billing, submitting claims for reimbursement and reporting encounters only when the services have been provided and documented in the manner required by laws, regulations, policies, and applicable standards of care. All Personnel must truthfully and carefully present, in accordance with applicable rules, for submission of bills and claims for reimbursement and for reporting encounters, whether those claims are submitted to NorthCare for payment or reporting or to a third party for payment. NorthCare personnel may not misrepresent charges to, or on behalf of, a consumer or payer. NorthCare will not tolerate false statements made by NorthCare personnel to a governmental agency. Deliberate misstatements to payers will expose the individual to potential criminal penalties and termination. Any NorthCare Personnel that knows or suspects that a bill or claim for reimbursement or encounter reporting is incorrect is required to report the matter immediately to the Compliance Officer.

Marketing and Media: NorthCare news releases, marketing campaigns and advertising materials shall not be deceptive or misleading by omission or commission. All marketing materials and advertising funded by Medicaid are subject to prior approval of Michigan Department of Health and Human Services (MDHHS).

WORKPLACE CONDUCT AND EMPLOYMENT PRACTICES

Employment Discrimination: NorthCare and its Personnel shall abide by any and all applicable federal and/or state equal opportunity statutes, rules, laws, and regulations. It is a violation of NorthCare Network’s policy to discriminate in the provision of employment opportunities, benefits, or privileges.

Drug-free Environment: NorthCare Network is committed to an alcohol and drug free environment. NorthCare prohibits the consumption or the unlawful possession, use, manufacture or distribution of illicit drugs, alcohol, or marijuana on or in its property, including NorthCare owned or leased vehicles. Any NorthCare Personnel reporting to work under the influence of any drugs, alcohol, marijuana, or any substance that impairs their ability to perform their job functions may result in disciplinary action up to and including termination.

Harassment: Mutual respect among all Personnel in the way we treat each other is expected. All NorthCare Personnel have the right to work in an environment free of harassment. Federal law prohibits harassment based on race, color, religion, sex (including pregnancy, sexual orientation, or gender identity), national origin, disability, age (40 or older) or genetic information (including family medical history). This also includes

sexual harassment or unwelcome sexual advances, requests for sexual favors, and other verbal or physical harassment of a sexual nature. It is a violation of NorthCare Network's policy to harass any individual in a manner as defined by law and will not be tolerated.

Weapons: Personnel shall not possess, maintain, keep, or bear any weapon, rifle, pistol, or other firearm, whether licensed or unlicensed, registered or unregistered, concealed or not concealed, holstered or unholstered, cased or uncased in or on any building, grounds, property or vehicle owned, rented or operated by NorthCare.

Personal Use of NorthCare Resources: Except as provided herein, use of NorthCare property, equipment, or other tangible assets for personal purposes without the prior written approval of the supervisor is prohibited. The occasional and limited personal use of NorthCare property, equipment, and tangible assets (e.g., making local phone calls and sending personal e-mail over company communications equipment) is acceptable so long as it doesn't disrupt business operations or staff productivity, and where NorthCare incurs no direct expense in connection with such personal use.

Nepotism: Personnel shall not hire, promote, or directly supervise a close relative. For this section, the term "close relative" means significant other, parent, child, sibling, grandparent, grandchild, aunt, uncle, niece, nephew, or cousin, through blood, marriage, or adoption.

Political Activities and Contributions: NorthCare Network funds or resources may not be used to contribute to political campaigns or for gifts or payment to any political candidate or party or any of their affiliated organizations. Prohibited conduct includes, but is not limited to, the use of work time and/or NorthCare equipment to solicit or canvas on behalf of a political cause or candidate. Personnel shall not publicly or privately represent his or her political views as those of NorthCare Network.

Reporting Violations: All NorthCare Personnel, independent contractors and subcontractors have the responsibility not only to comply with the laws and regulations but to ensure that others do as well. Any Personnel, independent contractors, or subcontractors with firsthand knowledge of activities or omissions that may violate applicable laws and regulations is required to report such wrongdoing. Reporting suspected violations is mandatory, not optional. Failure to report a suspected violation may be the basis for disciplinary action up to and including termination of employment, appointment, or contract. All reports of wrongdoing shall be investigated to the extent necessary to determine their validity. Personnel, independent contractors, or subcontractors making such a report in good faith shall not be retaliated against by NorthCare Personnel and will be protected by the Whistleblower's Protection Act. Discipline for engaging in acts that violate applicable laws and regulations, making knowingly false reports, or discipline for any other performance-related reason unconnected to reporting potential violations is not retaliation. Corporate Compliance violations may be reported to NorthCare's Compliance & Privacy Officer through either the hotline, e-mail, in person or in writing using contact information below.

1. All suspected or known cases of fraud, waste, abuse will be immediately reported to NorthCare Network with as much information and supporting documentation as possible.
 - a. Reports from Network Providers should be made utilizing the Fraud Referral Form.
 - b. Reports can be made directly to NorthCare Network:
 - i. By phone at: 1-906-936-6843 (voice messages are confidential).
 - ii. By email to: compliance@northcarenetwork.org
 - iii. By mail at: 1230 Wilson Street, Marquette, MI 49855
 - c. Reports can be filed with our anonymous reporting service:
 - i. By phone at: 1-844-260-0003
 - ii. Online at: report.syntrio.com/northcare
 - d. Reports can be made to the MDHHS-OIG:
 - i. online at <https://www.michigan.gov/mdhhs/doing-business/providers/providers/billingreimbursement/report-medicaid-fraud-and-abuse>
 - ii. By calling **855-MI-FRAUD (643-7283)**
 - iii. Sending a letter to:
Office of Inspector General
PO Box 30062
Lansing, MI 48909
2. Suspected or known cases of fraud, waste, abuse may be made anonymously.

All reports will be treated as confidential to the extent allowed by law and will only be shared with others on a bona-fide need-to-know basis. Under no circumstances will NorthCare as the PIHP tolerate retribution against any employee simply for making a “good faith” report to the Compliance & Privacy Officer.

Obligations are also identified and defined in the Governing Board approved NorthCare Compliance Plan and policies which are available at www.northcarenetwork.org. Commitment to the goals of the Compliance Plan is required for all Personnel. All personnel, independent contractors (their organizations and their staff), and subcontractors (their organizations and their staff) bear responsibility for compliance with all applicable laws and policy.