

EXHIBIT “E”

EL DORADO COUNTY MENTAL HEALTH DEPARTMENT

POLICY/PROCEDURE

SUBJECT: Code of Conduct	POLICY NUMBER: II-A-0-004
APPROVED BY: <hr/> Barry Wasserman, LCSW, Interim Director	DATE: <hr/>

El Dorado County Department of Mental Health (“EDCDMH”) maintains high ethical standards and is committed to complying with all applicable statutes, regulations, and guidelines. EDCDMH and each of its employees and contractors shall follow this Code of Conduct.

PURPOSE

The purpose of the EDCDMH Code of Conduct is to ensure that all EDCDMH employees and contractors are committed to conducting their activities ethically and in compliance with all applicable state and federal statutes, regulations, and guidelines applicable to Federal Health Care programs, and with all EDCDMH Policies and procedures. This Code of Conduct also serves to demonstrate EDCDMH’s dedications to providing quality care to its patients, and to submitting accurate claims for reimbursement to all payers.

CODE OF CONDUCT – GENERAL STATEMENT

- The Code of Conduct is intended to provide EDCDMH employees and contractors with general guidelines to enable them to conduct the business of EDCDMH in an ethical and legal manner;
- Every EDCDMH employee and contractor is expected to uphold the Code of Conduct;
- Failure to comply with the Code of Conduct, or failure to report reasonable suspected issues of non-compliance, may subject the EDCDMH employee or contractor to disciplinary action, up to or including termination of employment or contracted status. In addition, such conduct may place the individual, or EDCDMH, at substantial risk in terms of its relationship with various payers. In extreme cases, there is also the risk of action by a governmental entity up to and including an investigation, criminal prosecution, and/or exclusion from participation in the Federal Health Care Programs.

CODE OF CONDUCT

All EDCDMH employees and contractors:

- Shall perform their duties in good faith and to the best of their ability;
- Shall comply with all statutes, regulations, and guidelines applicable to Federal Health Care program, and with EDCDMH's own Policies and Procedures;
- Shall refrain from any illegal conduct. When an employee or contractor is uncertain of the meaning or application of a statute, regulation, or policy, or the legality of a certain practice or activity, he or she shall seek guidance from his or her immediate supervisor or the designated Compliance Officer;
- Shall not obtain any improper personal benefit by virtue of their employment or contractual relationship with EDCDMH;
- Shall notify the Compliance Officer immediately upon the receipt (at work or at home) of any inquiry, subpoena, or other agency or government request for information regarding EDCDMH;
- Shall not destroy or alter EDCDMH information or documents in anticipation of, or in response to, a request for documents by any applicable government agency or from a court of competent jurisdictions;
- Shall not engage in any practice intended to unlawfully obtain favorable treatment or business from any entity, physician, patient, resident, vendor, or any other person or entity in a position to provide such treatment or business;
- Shall not accept any gift of more than nominal value or any hospitality or entertainment, which because of its source or value, might influence the employee's or contractor's independent judgment in transactions involving EDCDMH;
- Shall disclose to the Compliance Officer any financial interest, official position, ownership interest, or any other relationship that they (or a member of their immediate family) has with EDCDMH's vendors or contractors;
- Shall not participate in any false billing of patients, government entities, or any other party;
- Shall not participate in preparation of any false cost report or other type of report submitted to the government;
- Shall not pay or arrange for EDCDMH to pay any person or entity for the referral of patients to EDCDMH, and shall not accept any payment or arrange for EDCDMH to accept any payment for referrals from EDCDMH;

- Shall not use confidential EDCDMH information for their own personal benefit or for the benefit of any other person or entity, while employed at or under contract to EDCDMH, or at any time thereafter;
- Shall not disclose confidential medical information pertaining to EDCDMH’s patients without the express written consent of the patient or pursuant to court order and in accordance with the applicable law and EDCDMH applicable Policies and Procedures;
- Shall promptly report to the Compliance Officer any and all violations or reasonably suspected violations of the Code of conduct by other employees or contractors;
- Shall promptly report to the Compliance Officer any and all violations or reasonably suspected violations of any statute, regulations, or guideline applicable to Federal Health Care programs or violations of EDCDMH’s own Policies and Procedures by other employees or contractors;
- Shall have the right to use the Confidential Disclosure Program without fear of retaliation with respect to disclosures; and with EDCDMH commitment to maintain confidentiality, as appropriate; and
- Shall not engage in or tolerate retaliation against any employee(s) or contractor(s) who report suspected wrongdoing.

CERTIFICATION

I, _____ by signing this Certification acknowledge that:

1. I have received a copy of the attached Code of Conduct Policy.
2. I have read the attached copy of the Code of Conduct Policy.
3. I agree to comply with the attached copy of the Code of Conduct Policy.

Signed _____

Date _____

Please return this signed-off original Certification to the El Dorado County Mental Health Compliance Officer.

Thank you.