

Corporate Compliance

POLICY

Mid-Ohio Psychological Services, Inc is dedicated to the delivery of mental health services in an environment characterized by strict conformance with the highest standards of accountability for administration, clinical, business, marketing and financial management. Mid-Ohio's leadership is fully committed to the need to prevent and detect fraud, fiscal mismanagement and misappropriation of funds and therefore, to the development of a formal corporate compliance program to ensure ongoing monitoring and conformance with all legal and regulatory requirements. Further, the organization is committed to establishment, implementation and maintenance of a corporate compliance program that emphasizes (1) prevention of wrong doing -whether intentional or unintentional, (2) immediate reporting and investigation of questionable activities and practices without consequences to the reporting party and (3) timely correction of any situation which puts the organization, its leadership or staff, funding sources or consumers at risk.

The basis for Mid-Ohio Psychological Services, Inc Corporate Compliance Program pre-date establishment of the formal program. Since its inception, Mid-Ohio has been built upon the principles of integrity, fair dealing, ethical conduct and legal and regulatory compliance. These principles are outlined and affirmed in MOPS Statement on Business Ethics and Conduct that is presented to all new employees and reviewed with all employees annually. The statement stresses the responsibility of every employee to comply, encourages open discussion of compliance issues, and spells out potential consequences for failure to comply.

The original Statement on Business Ethics and Conduct has been bolstered by the adoption of specific policies on relevant issues. Among these are:

- Conflict of Interest Policy
- Client Grievances and Complaints
- Financial Management
- Records Control
- Record Maintenance
- Risk Management

PROCEDURES

1. The Board of Directors has delegated overall responsibility for the Corporate Compliance Program to the Executive Director. The Executive Director designates a Corporate Compliance Officer, to monitor the organization's corporate compliance program and provide periodic and regular reports to the Board of Directors on matters pertaining to the program.

2. The Corporate Compliance Officer (CCO) (1) serves as the organization's primary point of contact for all corporate compliance issues, including making recommendations to the Executive Director and Board of Directors as required; (2) develops and implements the organization's corporate compliance plan, including monitoring, auditing, investigation, and reporting processes, procedures and systems; (3) prepares, submits and presents periodic clear communication to the organization's leadership for corporate compliance oversight; and (4) coordinates ongoing development of the organization's formal corporate compliance plan.
3. In the performance of duties, the CCO has direct and unimpeded access to the Executive Director, Board of Directors and the organization's accounting firm and/or legal counsel for matters pertaining to corporate compliance.
4. The CCO submits an annual report to the Executive Director and/or Board of Directors. Annual reports include, at a minimum: (1) a summary of all allegations, investigations and /or complaints processed in the preceding 12 months in conjunction with the corporate compliance program, (2) a complete description of all corrective action(s) taken, and (3) any recommendations for changes to the organization's policies and /or procedures.
5. MOPS recognizes that unimpeded communication is critical to the success of its Corporate Compliance Program. All MOPS employees have a direct and open line of communication with the Corporate Compliance Officer. Employees are encouraged to approach the CCO in person, in writing, by voice-mail or e-mail. If the CCO is unavailable, or employees wish to report an issue involving the CCO, employees are encouraged to communicate with the Accounts Payable Clerk or the Executive Director. Employees may report anonymously. The CCO will protect the confidentiality of those who report to the fullest extent possible.
6. MOPS has a no-reprisals policy regarding individuals who report instances of waste, fraud or ethical misconduct.
7. Procedures for Addressing Allegations of Wrong Doing
 - a. Immediately upon being notified of an allegation of waste, fraud, abuse or unethical conduct, the CCO initiates a thorough investigation. When appropriate, said investigation includes review of all related written documentation, interviews with all involved individuals, and consultation with MOPS Supervisory Team. Preliminary investigation of allegations is completed within ten business days of notification to the CCO. Regardless of the outcome of the investigation, there are no reprisals against the individual who has made the allegation.
 - b. If it is determined through thorough investigation that individual(s) have violated MOPS code of business ethics, the violator(s) will be subject to disciplinary action up to and including immediate termination as clearly stipulated in MOPS Statement on Business Ethics and Conduct and Section V: Conditions of Employment, of the agency's personnel procedures. Disciplinary action will be taken in a manner that is congruent with MOPS Personnel Procedures, fair, consistent for all employees and appropriate to the nature of the

violation. If the violation involves unlawful activity or places the agency in legal jeopardy, the CCO so informs and seeks advice from legal counsel.

- c. It is the CCO's responsibility to inform the Executive Director and the Board of Directors about the findings of compliance investigations and recommendations for reducing the risk of compliance violations.

8. Education and Training

- a. All new MOPS employees receive a copy of the Corporate Compliance Policy and Procedures during their new-employee orientation. At that time, the features of the policy are explained in detail and they are given the opportunity to ask questions about it.
- b. MOPS provides all staff training, delivered by the Executive Director and Corporate Compliance Officer, for all staff, about the Corporate Compliance Program. The training emphasizes the agency's commitment to compliance with all State and Federal Laws, and with all relevant Codes of Professional Conduct. MOPS statement on Business Ethics and Conduct provides the framework for the training. Topics covered during training include, but are not limited to:

- MOPS Corporate Compliance Program
- Consequences of Failure to Comply
- Ethics Policies
- Ethical Decision Making
- Confidentiality and Privilege
- Mandated Reporting and Duty to Warn
- HIPAA Regulations

**ACKNOWLEDGMENT STATEMENT OF AND COMPLIANCE WITH
MID-OHIO PSYCHOLOGICAL SERVICES, INC CODE OF CONDUCT**

NEW EMPLOYEES

I certify that the Corporate Compliance Policy and the Code of Conduct were explained to me and I was given the opportunity to ask questions of clarification. I agree to abide by it during the entire term of my employment. I also agree to abide by the following ethical behaviors:

1. I will maintain confidentiality of client information as specified in agency's Confidentiality Policies, including but not limited to, obtaining client's signed release before disclosing any information, recognizing that any knowledge regarding client information is privileged and should be treated strictly as such, and abiding by all rules of record maintenance and record security.
2. I will treat all clients and coworkers with dignity, respect, and fairness regardless of their socio-economic background.
3. I will conduct my professional activities without discrimination against clients or coworkers on the basis of race, religion, national origin, age, sex, disability, or ability to pay.
4. I will make every effort to ensure that all client's rights specified in the *Client Rights Statement* are protected.
5. I will refrain from financial transactions, sexual activity, and non-work related social interaction with clients.
6. I will make every effort to ensure that clients and payors are billed accurately in accordance with the client's signed fee agreement. I will initiate all necessary actions to resolve any conflict associated with charges.
7. I will divulge whether I am working in a competitive organization. The intent of this information is to identify any potential conflict of interest. This relates to any direct client care organization, educational institution, and the payors of services.
8. I will make clinical decisions and treatment recommendations based upon my client's identified needs regardless of personal financial incentives. These include clinical decisions for admission, assessment, treatment and any other processes of care.
9. I will abide by the Code of Ethics of my profession and MOPS Code of Ethics.

I acknowledge that I have a duty to report any alleged or suspected violation of the Corporate Compliance Policy or the Code of Conduct to the Compliance Coordinator. Unless otherwise noted below, I am not aware of any possible violation of the Code of Conduct or the Corporate Compliance Policy. I also certify that I have not been convicted of, or charged with, a criminal offense nor have I been listed by a federal agency as debarred, excluded or otherwise ineligible for participation in federally funded health care programs.

Signature

Job Title

Name (print)

Date

**ACKNOWLEDGMENT STATEMENT OF AND COMPLIANCE WITH
MID-OHIO PSYCHOLOGICAL SERVICES, INC CODE OF CONDUCT**

CONTINUING EMPLOYEES

I certify that I have reviewed the Corporate Compliance Policy and the Code of Conduct and agree to continue to abide by it during the entire term of my employment. I also agree to continue to abide by the following ethical behaviors:

1. I will maintain confidentiality of client information as specified in agency's Confidentiality Policies, including but not limited to, obtaining client's signed release before disclosing any information, recognizing that any knowledge regarding client information is privileged and should be treated strictly as such, and abiding by all rules of record maintenance and record security.
2. I will treat all clients and coworkers with dignity, respect, and fairness regardless of their socio-economic background.
3. I will conduct my professional activities without discrimination against clients or coworkers on the basis of race, religion, national origin, age, sex, disability, or ability to pay.
4. I will make every effort to ensure that all client's rights specified in the *Client Rights Statement* are protected.
5. I will refrain from financial transactions, sexual activity, and non-work related social interaction with clients.
6. I will make every effort to ensure that clients and payors are billed accurately in accordance with the client's signed fee agreement and our sliding fee scale. I will initiate all necessary actions to resolve any conflict associated with charges.
7. I will divulge whether I am working in a competitive organization. The intent of this information is to identify any potential conflict of interest. This relates to any direct client care organization, educational institution, and the payors of services.
8. I will make clinical decisions and treatment recommendations based upon my client's identified needs regardless of personal financial incentives. These include clinical decisions for admission, assessment, treatment and any other processes of care.
9. I will abide by the Code of Ethics of my profession and the agency's Code of Ethics.

I acknowledge that I have a duty to report any alleged or suspected violation of the Corporate Compliance Policy or the Code of Conduct to the Compliance Coordinator. I also certify that I have not been convicted of, or charged with, a criminal offense nor have I been listed by a federal agency as debarred, excluded or otherwise ineligible for participation in federally funded health care programs. Further I certify that I am not aware of any additional circumstances that could represent a potential violation of the Corporate Compliance Policy or the Code of Conduct. I will report any potential violation of which I become aware promptly to the Compliance Coordinator. I understand that any violation of the Corporate Compliance Policy, the Code of Conduct or any other agency policy or procedure is grounds for disciplinary action, up to and including termination from employment.

Signature

Job Title

Name (print)

Date

Please return this form to the Administrative Coordinator for filing in the employee's personnel file. Rev. 4/05