ENDEAVOR HEALTH SERVICES	Policies & Procedures **Corporate Compliance Code of Conduct and Ethics**		Accounting / Finance
			Administration
			Billing
		X	Compliance
			Employee Handbook
			HIPAA Security
			HIPAA Manual
Section: 13	Prepared by: **Joe Saeva**		Human Resources
Issue Date:**09/29/2011**	Revisions by: **Chris Blask**		Outpatient Manual
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GENERAL STATEMENT OF POLICY

The Code of Conduct and Ethics has been adopted by Endeavor Health Service (EHS) to provide standards by which everyone, regardless of position, conducts themselves to protect and promote organization-wide integrity and to enhance EHS' ability to achieve its organizational mission. Failure to comply can result in serious damage to our standing in the community, regulatory action against the organization and individual employees, and employee disciplinary action up to, and including, immediate dismissal.

SCOPE

This code applies to the Endeavor Health Services Board of Directors, Executive Management, employees, medical staff, volunteers, contractors and vendors.

REVISION HISTORY

First Issue 9/29/11, Rev. 11/18/15, Rev. 11/17/17; Rev 08/24/2023
Rev 07/29/2026

ENDEAVOR
HEALTH SERVICES

Corporate Compliance

Code of Conduct
&
Ethics

A MESSAGE FROM THE PRESIDENT AND CHIEF EXECUTIVE OFFICER AND CORPORATE COMPLIANCE OFFICER

Personal and Corporate integrity have been one of Endeavor Health Services' guiding principles since the day the organization was founded. They enter into everything we do and are a central part of our daily lives. We are committed to providing high-quality services and care in an ethical manner, which is also in full compliance with federal and state laws and regulations.

Senior management staff and the Compliance Officer have a responsibility to review ethical and regulatory compliance issues within the organization. It is our responsibility to ensure that appropriate procedures, with respect to ethics and regulatory matters, are in place and enforced throughout our organization.

The Code of Conduct and Ethics is the cornerstone of our Compliance Program. One of the functions of the Corporate Compliance Officer is to be available to employees as a resource for providing guidance on the program's standards, policies and procedures.

This Code of Conduct and Ethics was created to meet the needs of Endeavor Health Services, ensure compliance with applicable laws and regulations and provide employees with clear requirements for appropriate behavior.

We ask that you familiarize yourself with the standards, policies and procedures of the Code of Conduct and Ethics as well as the Compliance Program. It is imperative that you understand how these standards, policies and procedures affect you. (The full version of the Code of Conduct and Ethics along with the Compliance Program are in the Procedure manuals located at each clinic site and also on the computer Shared Drive).

If at any time you have questions regarding the Code of Conduct and Ethics, please do not hesitate to discuss them with your immediate supervisor or manager, or you can contact the Compliance Officer.

If you are aware, or become aware, of a potential or actual violation of the Code, you must report it to management and/or the Compliance Officer as soon as possible.

We are proud to contribute to a process that will ensure that our business and clinical practices maintain the highest level of integrity. We ask that you join us, the management team and the Board of Directors in making a commitment to remain active participants in improving the ways in which we do business. Your commitment is essential to the shared values that unite us as an organization, guide our decisions and actions, and promote the highest quality of care.

Elizabeth L. Mauro
President and CEO

Chris Blask
Corporate Compliance and Privacy Officer

INTRODUCTION

Endeavor Health Services (EHS) is dedicated to treating the people we serve and our employees in an ethical, legal, and responsible manner. Furthermore, EHS is committed to providing all services in full compliance with all applicable laws, regulations and guidelines, as well as its own policies and procedures.

If you have any questions about the Code of Conduct and Ethics or any of EHS' policies and procedures, ask your manager or the Compliance Officer. EHS' Management Team has a special obligation to be available and responsive to employees when questions arise about adherence to the Code. If you are not satisfied with management's response concerning application of the Code, please raise your concerns to the highest level of management or to the Compliance Officer.

The Code of Conduct and Ethics is an integral part of our Corporate Compliance Program and sets standards that define EHS' commitment to compliance. The Code serves as a foundation document for our program. The Corporate Compliance Officer and the Corporate Compliance Committee are tasked to manage the Compliance Program in accordance with the Code and the law. We are particularly sensitive to those requirements and regulations applicable to federal and state healthcare programs and to accurate billing practices.

The Code of Conduct and Ethics and the Compliance Program in general are intended to ensure that we meet our compliance goals in a highly regulated environment. The Code will provide general guidance and does not replace Endeavor Health Services' policies and procedures. In the absence of a specific policy, the Code becomes the policy. The Code is a "living document" which will be updated periodically to respond to changing conditions. Accordingly, EHS reserves the right to change any or all of these provisions at any time.

CORPORATE COMPLIANCE PROGRAM SUMMARY

The Compliance Program is the collective name for all the formal and informal activities that Endeavor Health Services (EHS) undertakes to support and foster adherence to sound ethical and business practices. The program is directed through the Compliance Department and Management Team but compliance and ethical practices are everyone's job. The Compliance Program is one component of EHS' ethical culture.

How Does the Compliance Program Work?

Every Endeavor Health Services employee must practice sound ethics and follow all applicable laws and regulations in everything we do. The Compliance Program supports this effort by establishing consistent standards, thorough training and assessment of best practices. Employees can help by understanding the Compliance Program, knowing the legal requirements of their job, and seeking help whenever they are unsure of what or how to do something. The most important action any of us can take is to do the right thing and ensure that everyone else does as well. Supervisors, Program Directors and the Corporate Compliance Officer have copies of the Corporate Compliance Manual; this manual is available to staff for review at any time.

EHS has a Staff Program-level Compliance Committee that meets quarterly to review policies, procedures and corporate compliance-related issues. This committee consists of the Vice President of Operations, Corporate Compliance Officer, Compliance Auditors, Billing Manager, Vice President of Clinical Operations, Clinical Directors, Billing Manager, Quality Improvement (QI) Manager, Sr. Director of Fiscal Operations and Information Technology (IT) and any other staff deemed appropriate by the committee.

Employees are expected to report suspected compliance issues or unethical behaviors to their **immediate supervisor, Program Director and/or the Corporate Compliance Officer.** We attempt to keep all reported issues confidential to the extent that it is reasonable. Employees may also report suspected compliance issues directly to the Corporate Compliance Officer in person or by using the compliance complaint form, by letter, email or by use of the anonymous Compliance telephone hotline (855) 252-7606 or anonymous email website Healthcare Compliance Solutions | Compliance Resource Center, which are available 24/7 365 days.

EHS follows the guidelines of the False Claims Act. It is every employee's duty to be familiar with this Federal and State law. The False Claims Act includes a: "qui tam" or whistleblower provision that essentially allows any person with actual knowledge of allegedly false claims to the government to file a lawsuit on behalf of the government. The False Claims Act also entitles whistleblowers to protection from retaliation from the employer .

A Compliance Program is beneficial to everyone. It enhances employee morale, productivity and effectiveness. It also improves the quality of care. Our goal is to integrate compliance culture into daily operations in order to create a better workplace and to ensure quality care to the people we serve.

Compliance Monitoring

A major component of compliance is integrating monitoring into every aspect of performance with goals of improving quality performance and preventing compliance violations. The monitoring process establishes quality and compliance into business and service delivery systems on the front end to reduce compliance violations on the back end and to establish documented best practices.

This monitoring process enables problem identification and resolution and makes it possible to measure performance at specific points in time and over time in both service areas and administrative functions across Endeavor Health Services.

The Do's and Don'ts of Compliance

Do inform Supervisor(s), Program Director(s) or Corporate Compliance Officer if you are:

- Aware of or suspect non-compliance with regulatory or agency policy
- Unsure of laws, regulations, or payer requirements

Do take the time to learn and understand:

- Regulations, laws, and licensing requirements
- State agencies' Standards of Care (SOC), including OMH, OASAS, PROS, and ACT
- Payer requirements, EHS policies and standards
- Sound business practices that pertain to your job

Do document all activities in accordance with the applicable standards and regulations

Do follow all Health Insurance Portability and Accountability Act (HIPAA) guidelines and secure all Protected Health Information (PHI)

Do exemplify the EHS mission and values

Do abide by EHS' code of conduct and ethics

Do support and promote compliance and strong ethics among your co-workers, staff and others

Do not sign for others or falsify documents of any kind

Do not talk about treatment issues pertaining to specific people served or families in any public setting

Do not violate any of the requirements for the important service that you provide

"Always do the right thing in the right way"

Corporate Compliance and Privacy Officer
Endeavor Health Services
795 Indian Church Rd.
Buffalo, N.Y. 14224
(716) 895-6700, Ext 4307

RESPONSIBILITIES UNDER THE CODE OF CONDUCT AND ETHICS

This code is the foundation of EHS' Compliance Program and applies to all members of the organization (Board of Directors, employees, medical staff, volunteers, contractors, vendors, administration and agents of Endeavor Health Services).

Employee Responsibilities: (includes vendors, volunteers, contractors and agents).

- Understand how the Compliance Program applies to your job and seek assistance and clarification from your supervisor, the Compliance Officer, or other EHS resources when you have questions about the application of the standards and other EHS policies to your work.
- Report any conduct that you think may be in violation of this code.
- Listen and respond to questions, complaints, or concerns expressed by people served, family members, visitors, or colleagues.
- Complete all required compliance training upon hire and annually.

Manager and Supervisor Responsibilities

Build and maintain a culture of compliance and sound ethical behavior

- Personally lead compliance efforts through regular meetings and proactive steps that include compliance reports and regular monitoring of compliance matters and trends.
- Know, understand, and follow the statutes, rules, and regulations that govern EHS' programs.
- Support and encourage employees to raise conduct and ethical questions and concerns.
- Make certain that all subordinates complete all required compliance training.
- Work with the Corporate Compliance Committee to ensure that a culture promoting compliance is engrained in Endeavor Health Services.

Prevent compliance problems

- Identify compliance risks and propose appropriate policies and procedures to address such risks.
- Provide education and support to assist employees in understanding the Code, EHS policies and procedures, and federal and state regulations and laws.

Detect compliance problems

- Implement and maintain appropriate controls to monitor compliance and mechanisms that foster the effective reporting of potential compliance issues.
- Promote an environment that permits employees to raise concerns without fear of retaliation.

Respond to compliance problems

- Provide prompt corrective action to address weaknesses in compliance measures.
- Utilize appropriate disciplinary action when necessary.
- Consult with EHS' Compliance Officer so that compliance issues are promptly and effectively addressed.

Responsibilities of Endeavor Health Services' Board of Directors

- Lead by example.
- Set the mission for EHS' Compliance Program and exercise oversight through the Corporate Compliance Committee.
- Make decisions that are in the best interest of EHS and unaffected by conflicts of interest.
- Receive appropriate reports from the Compliance Officer and the Compliance Committee concerning the status of EHS' Corporate Compliance Program and ensure the provision of the resources required to maintain its vitality and EHS' response to identified compliance deficiencies.

- Seek and act upon advice from management, including EHS' Chief Executive Officer, Sr. Director of Fiscal Operations, General Counsel, Corporate Compliance Officer and the Corporate Compliance Committee.
- Maintain the confidentiality of all compliance-related information provided, subject to the requirements of applicable law.
- Complete required compliance training.

STANDARDS OF CONDUCT AND ETHICS

Quality of Care

Endeavor Health Services is committed to upholding the values, principles and standards that have been established by the Board of Directors and the Corporation. We are committed to providing high-quality care and services to the people we serve, their families, and the community.

These values, principles and standards include:

- Being respectful, cooperative and helpful toward people served, co-workers, suppliers and the general public.
- Treating the people we serve with respect and dignity.
- Providing the people we serve with services that are fair and equitable without regard to race, color, religion, gender, national origin, age, marital status, sexual orientation, disability, or status as a veteran.
- Providing services to the people we serve that meet the current standards of practice.
- Respecting the privacy of the people we serve and adhering to HIPAA guidelines set forth in EHS' HIPAA Manual.
- Addressing any deficiency or error by reporting it to a supervisor who can review the concern and appropriately follow-up and correct the concern.
- Applying our admission, treatment, and discharge policies to all people served based upon identified person served needs, our mission, and appropriate business practices (including guidelines for payment and financial classification).
- Listening to the people we serve, families and visitors to understand any concerns or complaints and involving people served in the decision-making process about their care.
- Quickly and efficiently responding to people served's questions, concerns and needs.
- Maintaining licensure and credentialing standards to further the provision of clinical services by properly trained and experienced staff.

Conflicts of Interest

We expect our employees, Board of Directors, medical staff and volunteers to avoid any activities that may involve (or may appear to involve) a conflict of interest.

- We will avoid conflicts of interest between our own private interests and our Endeavor Health Services duties.
- We will not engage in any activity that may influence or appear to influence our ability to provide objective decisions in the course of our job responsibilities or services we provide for EHS.
- We will maintain and support questions on policies and procedures that make clear when an individual's private interests may inappropriately interfere with EHS' interests.
- We will identify expectations of conduct for all employees and require that individuals remain free of conflicts of interest in the performance of their responsibilities and provided services to EHS.
- We will require EHS' Board of Directors, employees, medical staff and volunteers to inform EHS of personal business ventures and other scenarios that could be perceived as conflicts of interest.

Billing and Coding Compliance

We are committed to fair and accurate billing that is in accordance with all applicable federal and state laws, regulations and EHS' policies and procedures.

- We will bill only for services actually provided and documented in the person served's clinical records.
- We will promote compliance with the laws governing the submission and review of bills for our services and will deal with billing inquiries in an honest and forthright manner.
- We will charge for services provided in accordance with applicable law and policy, including required reductions or waivers of fees to ensure access to care.
- We will use systematic methods for analyzing the payments we receive and will reconcile any overpayments in a timely manner after discovery and review.
- We will assign diagnostic, procedural, and billing codes that actually reflect the services that were provided.
- We will periodically review coding practices and policies, including software edits, to facilitate compliance with all federal, state and private payer health care program requirements.
- We understand that all claims for services to be submitted to any insurance program or payer, Medicare, Medicaid, or other federally funded health care programs have to be accurate and correctly identify and document the services rendered.
- We will investigate inaccurate billing and payments to determine whether changes to current protocol or other remedial steps are necessary.
- We will respond to questions and complaints related to a person served's bill in a direct and honest manner.
- We will implement documentation systems sufficient to create and maintain complete and accurate documentation of services provided.
- We will maintain copies of all documentation and billing as determined by federal and state laws.

Workplace Environment

We recognize that a diverse workforce enriches the life experience of all employees and our community and will promote diversity.

- We will treat our employees with respect and will engage in human relations practices that promote their personal and professional advancement.
- We will provide equal employment opportunities to employees and applicants for employment without regard to race, color, religion, gender, national origin, marital status, political belief, age, veteran status, sexual orientation or disability or any other category in accordance with applicable law.
- We will implement policies and procedures that promote compliance with laws governing nondiscrimination in personnel actions, including recruiting, hiring, training, evaluation, transfer, workforce reduction, termination, compensation, counseling, discipline and promotion of employees.
- We will promote diversity with respect to individuals with disabilities and will make reasonable accommodations to any individual, as required by law.
- We will recognize the right of our employees to a workplace free of violence and harassment and will not tolerate any form of harassment or violence toward our employees.
- We will implement policies and procedures that promote appropriate conduct in the workplace and prohibit unwanted or hostile interaction, including degrading or humiliating jokes, physical or verbal intimidation, slurs, or other harassing conduct.
- We will not tolerate any form of sexual harassment, either overt or less obvious forms of harassment.

- We are committed to providing a safe work environment and will implement and monitor policies and procedures for workplace safety compliant with federal and state safety laws, regulations and workplace safety directives.

Protection and Use of Information, Property, and Assets

We are committed to protecting Endeavor Health Services information and other property against loss, theft, destruction, and misuse.

- We will correctly use and care for all property and equipment entrusted to us.
- We will appropriately maintain inventory and keep all supplies secure.
- We will comply with software licensing agreements.
- We will prohibit the making of unauthorized copies of computer software or the use of personal software on EHS computers.
- We will protect confidential EHS information.
- We will maintain all information, whether medical, financial or business, in accordance with all applicable laws, regulations, and organizational policies.
- We will not falsify or inappropriately alter information on any record or document.
- We will establish retention periods and protocols for business, financial, and person served records in our system.
- We will promote the accurate, detailed, and complete documentation of all business, financial, and person served transactions.
- We will control and monitor access to EHS' communication systems, electronic mail, Internet access and voicemail to ensure that such systems are accessed appropriately and used in accordance with EHS' policies and procedures.
- We will protect the privacy and security of person served medical, billing and claims information, and other protected health information through sufficient and reasonable physical, technical, and administrative measures to prevent unauthorized access to or disclosure of person served information.
- We will provide access to medical, billing and claims information for people served and their legal representatives as required by law.
- We will not knowingly communicate or transfer any information or documents to any unauthorized persons.
- We will safeguard the personal and human resources information of our employees and information within the human resources system as required by law.

Professional Conduct with People Served

We expect our employees to maintain the highest degree of integrity and professionalism with the people we serve and their families.

- We will always maintain a professional and objective attitude and behavior that will promote the person served's best interest and well-being and will not exploit a relationship with them for personal advantage or benefit.
- We will maintain a personal concern for the welfare of the person served both during and after treatment.
- We will make every effort to discourage the development of personal obligations in the therapeutic relationship.
- We will never exhibit behavior which would or could be considered abusive or damaging to the person served.
- We will always discontinue treatment when it is reasonably clear that the person served will not benefit from further services.

- We will never engage in intimate or sexual relationships with persons served, whether consensual or not.
- We will not develop outside social relationships with persons served or their families.

Health and Safety

We are committed to maintaining the health and safety of our employees, people served, and visitors and to establishing and maintaining a comfortable and safe environment.

- We will make every effort to comply with all applicable federal and state workplace safety requirements.
- We will be responsible for our own personal property while on EHS premises.
- We will promptly report any suspicious, unusual, or dangerous situations to Security, Site Team Leader or Management.
- We will share ideas, concerns, or suggestions for improved safety standards in the workplace with supervisors and senior management.
- We will be expected to obey safety rules and exercise caution and common sense in all work activities.
- We will immediately report all work-related injuries and illnesses to supervisor, senior managers or Human Resource Department.
- We will follow all applicable laws and regulations to ensure EHS is a workplace that is free of illicit drugs, alcohol and tobacco products. EHS will also not serve alcoholic beverages on EHS' premises during work hours at any time.
- We will safely store, secure and regulate all medications and pharmaceuticals. Missing or diverted medication will be promptly reported to the appropriate supervisor or senior manager.
- EHS will provide all employees with health and safety training in an effort to reduce risks.