



## SALISH BHO

### HIPAA, 42 CFR PART 2, AND MEDICAID COMPLIANCE STANDARDS POLICIES AND PROCEDURES

**Policy Name:** CODE OF CONDUCT

**Policy Number:** 5.23

**Reference:** SBHO Mission Statement

**Effective Date:** 8/2016

**Revision Date(s):** 5/2017; 8/2018

**Reviewed Date:** 8/2016; 5/2017; 5/2018; 8/2018

**Approved by:** SBHO Executive Board

*The Salish Behavioral Health Organization is dedicated to ensuring and continually improving the delivery of quality behavioral health care so that the individuals we serve may better manage their illness, achieve their personal goals, and live, work and participate in their community.*

## POLICY

The Salish Behavioral Health Organization (SBHO) is committed to ensuring that all staff and associates conduct their activities professionally, ethically, and in compliance with all applicable state and federal statutes, regulations, and guidelines applicable to Federal Health Care programs and with all SBHO Policies and Procedures. We have a responsibility to each other and to the community as a whole to operate ethically and honestly.

This Code of Conduct serves to demonstrate SBHO's dedication to providing quality care to persons receiving services, and to submitting accurate claims for reimbursement to all payers. The SBHO establishes this Code of Conduct to ensure that the SBHO community, which includes employees (paid and volunteer) and board members, will know and understand expectation of behavior.

This Code is not meant to answer every question that might arise in daily activities; however, it does provide guidelines, direction and resources that can be used to respond to matters and circumstances in the course of SBHO duties. No set of guidelines, including these, can ever substitute for the sound judgment, common sense and personal integrity required to meet the challenges of the job.

All SBHO employees (paid and volunteer) and board members are responsible for understanding and adhering to this Code of Conduct. Inherent in this Code are the following principles by which all employees (paid and volunteer) and board members, as applicable, will abide:

## Principle 1 - Legal Compliance and Ethical Business Practices

- 1.1 Business is conducted complies with all relevant local, state, and federal laws, rules, and ordinances.
- 1.2 Business practices are conducted truthfully, fairly, and without deception.
- 1.3 Facilities and resources are used solely for the benefit of the SBHO.
- 1.4 The SBHO does not discriminate. SBHO believes in the fair and equitable treatment of individuals, providers, employees (paid and volunteer), and board members.
- 1.5 SBHO employees (paid and volunteer), and board members conduct all activities in accordance with the highest ethical standards.
- 1.6 SBHO cooperates with government inquiries and investigations as required by law.

## Principle 2 – Confidentiality

- 2.1 Employees (paid and volunteer) and board members abide by Health Insurance Portability and Accountability Act (“HIPAA”), along with applicable policies and procedures, and 42 CFR Part 2. The confidentiality of all medically and clinically sensitive, and personal and proprietary information, is protected.
- 2.2 Proprietary information is protected and only shared with employees (paid and volunteer) and board members having a need to know such information to perform their job responsibilities.

## Principle 3 - Avoid Real and Apparent Conflicts of Interest

- 3.1 All SBHO employees (paid and volunteer) and board members are obligated to avoid situations or conduct that could influence (or appear to influence) objective decisions in the performance of assigned duties and responsibilities—or that could raise questions as to the honesty and integrity of SBHO or negatively impact its reputation.
- 3.2 Business transactions with vendors, contractors and other third parties shall be transacted free from offers of solicitation of gifts and favors or other improper inducements in exchange for influence or assistance in a transaction.

## Principle 4 - Protection of Assets

- 4.1 All members of the community will strive to preserve and protect the assets of SBHO by making prudent and effective use of the SBHO’s resources and properly and accurately reporting its financial condition.

## **PROCEDURE**

All employees (paid and volunteer) and board members are responsible to:

1. Know the existing laws, regulations, and ordinances relevant to the management of a multi-member government behavioral health system.
2. Know, articulate, and exude SBHO Mission Statement.

3. Conduct business in a professional manner that respects the rights and decisions of others, fosters cooperation and integration, respects diversity and is in the best interest of SBHO.
4. Professionally participate in the development, adoption, and adherence to relevant policies to be used in the management of SBHO.
5. Ensure individuals voice is heard and considered prior to making policy decisions.
6. Improve the public knowledge and perception of SBHO and the SBHO provider network.
7. This Code of Conduct Policy and Procedure, which clearly reflects the standards of conduct, will be reviewed and updated on an annual basis.
8. All SBHO staff, volunteers and governing board members will review and attest to this Code of Conduct by signing an attestation annually.

### **MONITORING**

1. Consequences for noncompliance by SBHO staff (paid and volunteer) will rely on Kitsap County Personnel Policies and Procedures.
2. All parties are encouraged to suggest changes or additions to this Code. The Code augments, but does not limit, specific policies and procedures of SBHO.
3. Reports of any concerns may be made to a manager, supervisor or to the Compliance Officer or Hotline.
4. Managers and supervisors are further required to report allegations reported to them and to report any known or suspected violations of any laws, acts, statutes or regulations that they discover in the performance of their supervisory duties. Reports can be made to the Compliance Officer or can be made via the compliance Hotline.
5. If you know of a violation but fail to report it, you could be considered a party to the violation.
6. Anyone who ever feels retaliated against for making a report should contact the Compliance Officer immediately.