

CHELAN-DOUGLAS RSN/PIHP POLICY AND PROCEDURE MANUAL		Chapter:	1.17
Title:	Compliance	Page:	1 of 7
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		Authorizing Signature:	

INTRODUCTION

This Code of Conduct covers a wide range of RSN/PIHP business practices and procedures. It does not cover every issue that may arise, but it sets out basic principles to guide all employees and officers of the RSN ("RSN", when used in this document, covers the CDRSN RSN/PIHP and all of its contractors). All of our employees and officers must conduct themselves accordingly and seek to avoid even the appearance of improper behavior. The Code should also be provided to and followed by the RSN's agents and representatives. In addition, RSN policies apply to various RSN operations and you need to know and follow those policies that apply to your work.

If a law conflicts with a policy in this Code, you must comply with the law. Also, if a local custom or policy conflicts with this Code, you must comply with the Code. If you have any questions about these conflicts, you should ask your supervisor how to handle the situation. Employees and officers are responsible for understanding the legal and policy requirements that apply to their jobs and reporting any suspected violations of law, this Code or Company policy.

Those who violate the standards in this Code will be subject to disciplinary action, *including possible dismissal*. Furthermore, violations of this Code may also be violations of the law and may result in civil or criminal penalties for you, your supervisors and/or the RSN. *If you are in a situation which you believe may violate or lead to a violation of this Code, follow the procedures set out in Section 14 of this Code.*

The basic principles discussed in this Code are subject to any RSN policies covering the same issues.

1. *Compliance with Laws, Rules and Regulations*

Obeying the law, both in letter and in spirit, is the foundation on which this RSN's ethical standards are built. All employees and officers must respect and obey the laws, rules and regulations of the cities, counties, states and countries in which we operate. Although employees and officers are not expected to know the details of each of these laws, rules and regulations, it is important to know enough to determine when to seek advice from supervisors, managers or other appropriate personnel.

2. *Conflicts of Interest*

A "conflict of interest" exists when a person's private interest interferes in any way - or even appears to interfere - with the interests of the RSN. A conflict situation can arise when an employee or officer takes actions or has interests that may make it difficult to perform his or her work objectively and effectively. Conflicts of interest may also arise when an employee or officer, or a member of his or her family, receives improper personal benefits as a result

of his or her position in the RSN. Loans to, or guarantees of obligations of, employees and officers and their family members by the RSN may create conflicts of interest and in certain instances are prohibited by law.

It is a conflict of interest for an RSN employee or officer to work for a competitor, providers, consumer or supplier. You should avoid any direct or indirect business connection with our providers, consumer, suppliers or competitors, except as required on our behalf.

Conflicts of interest are prohibited as a matter of RSN policy, except as approved by the CDRSN Board of Director's (Board of Douglas County Commissioners/RSN Governing Board). Conflicts of interest may not always be clear-cut, so if you have a question, you should consult with your supervisor or follow the procedures set out in Section 19. Any employee or officer who becomes aware of a conflict or potential conflict should bring it to the attention of a supervisor, manager or other appropriate personnel or consult the procedures provided in Section 14 of this Code.

3. *Competition and Fair Dealing*

We seek to outperform our competition fairly and honestly. We seek competitive advantages through superior performance, never through unethical or illegal business practices. Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent, or inducing such disclosures by past or present employees of other companies is prohibited. Each employee and officer should endeavor to respect the rights of and deal fairly with the RSN's providers, consumers, suppliers, competitors and employees. No employee or officer should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other illegal practice.

No employee or officer is permitted to engage in price fixing, bid rigging, allocation of markets or consumers, or similar illegal anti-competitive activities.

To maintain the RSN's valuable reputation, compliance with our quality processes and safety requirements is essential. All inspection and testing documents must be handled in accordance with all applicable specifications and requirements.

No gift or entertainment should ever be offered, given, provided or accepted by any RSN employee or officer, family member of an employee or officer, or agent unless it does not violate any County laws, regulations or applicable policies. Please discuss with your supervisor any situations which you feel may not be appropriate.

4. *Political Contributions*

The RSN prohibits political contributions (directly or through trade associations) by the RSN. This includes: (a) any contributions of RSN funds or other assets for political purposes, (b) encouraging individual employees to make any such contribution; or (c) reimbursing an employee for any contribution.

Individual employees are free to make personal political contributions as they see fit.

5. *Discrimination and Harassment*

The diversity of the RSN's employees is a tremendous asset. We are firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any illegal discrimination or harassment based on race, color, religion, sex, national origin or any other protected class. For further information you should consult the appropriate RSN or County policy.

6. *Health and Safety*

The RSN strives to provide each employee and officer with a safe and healthy work environment. Each employee and officer has responsibility for maintaining a safe and healthy workplace for all employees and officers by following environmental, safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions. Violence and threatening behavior are not permitted.

Employees and officers are expected to perform their RSN related work in a safe manner, free of the influences of alcohol, illegal drugs or controlled substances. The use of illegal drugs in the workplace will not be tolerated.

7. *Ethical Computing*

The RSN is committed to protecting itself, its staff and persons whose data is held or transmitted by the RSN from unethical or damaging actions by individuals using its computer systems. To that end, the following ethical computing guidelines have been enacted:

Save any mission critical work/documents to a folder on the server instead of on your desktop. Servers are backed up periodically in accordance with IT policy allowing for information to be restored in the event of damage to network systems. The ability to rapidly restore critical documents/information will minimize potential harm to the RSN and others relying on the information.

It is important never to use another person's computer resources without their authorization or approval, or to view others personal computer files without their express permission. Provide others only with access to your personal folders/calendars/contacts required to perform their job duties.

Always use your own username and password when using a workstation or accessing the MIS system. Never share your username or password with anyone else, as this practice could compromise your user account if the person you give it to does something unethical, and could be a violation of the HIPAA security rule of consumer PHI is accessible.

The RSN requires that no Protected Health Information (PHI) be transmitted via unsecured means, such as unencrypted e-mail. If you inadvertently send PHI in a manner that is not secure, or you receive unsecured PHI from a providers, notify the Privacy Officer as soon as practicable.

Be cognizant that consumer PHI resides on RSN servers and potential risks to the security of PHI may exist. If you believe or are concerned that the security of the RSN network may have been breached, report your concern to the Privacy Officer as soon as practicable. The safety and security of consumer information is paramount.

8. *Record-Keeping, Financial Controls and Disclosures*

The RSN requires honest, accurate and timely recording and reporting of information in order to make responsible business decisions.

All of the RSN's books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect the RSN's transactions, must be promptly disclosed in accordance with any applicable laws or regulations and must conform both to applicable legal requirements and to the RSN's system of internal controls.

Business records and communications often become public, and we should avoid exaggeration, derogatory remarks, guesswork, or inappropriate characterizations of people and companies that may be misunderstood. This applies equally to email, internal memos, and formal reports. Records should always be retained or destroyed according to the RSN's record retention policies.

9. *Confidentiality*

Employees and officers must maintain the confidentiality of proprietary information entrusted to them by the RSN or its providers, consumers or suppliers, except when disclosure is authorized in writing or required by laws or regulations. Proprietary information includes all non-public information that might be of use to competitors or harmful to the RSN or its providers, consumers or suppliers if disclosed. It includes information that suppliers and consumers have entrusted to us. The obligation to preserve proprietary information continues even after employment ends.

10. *Waivers of the Code of Business Conduct and Ethics*

Any waiver of this Code for executive officers or directors may be made only by the CDRSN Governing Board and will be promptly disclosed as required by law or regulation.

11. *Reporting any Illegal or Unethical Behavior*

Employees are encouraged to talk to supervisors, managers or other appropriate personnel about observed behavior, which they believe may be illegal or a violation of this Code of Conduct or RSN policy or when in doubt about the best course of action in a particular situation. It is the policy of the RSN not to allow retaliation for reports made in good faith by employees of misconduct by others. Employees are expected to cooperate in internal investigations of misconduct.

12. *Improper Influence on Conduct of Auditors*

You are prohibited from directly or indirectly taking any action to coerce, manipulate, mislead or fraudulently influence the RSN's independent auditors for the purpose of rendering the financial statements of the RSN materially misleading. Prohibited actions include but are not limited to those actions taken to coerce, manipulate, mislead or

fraudulently influence an auditor: (1) to issue or reissue a report on the RSN's financial statements that is not warranted in the circumstances (due to material violations of generally accepted accounting principles, generally accepted auditing standards or other professional or regulatory standards); (2) not to perform audit, review or other procedures required by generally accepted auditing standards or other professional standards; (3) not to withdraw an issued report; or (4) not to communicate matters to the RSN's Audit Committee.

13. *Step Down Considerately*

The RSN is a great place to work, but it is understandable that occasionally staff will decide to leave for another position, retirement or other adventure. We ask that if and/or when that time comes that they do so in a way that minimized disruption to the RSN and the important mission of providing mental health services to those in need. This means that any staff leaving employment with the RSN should inform his or her supervisor of the status of any ongoing projects, any deadlines for projects or deliverables in process, near-term required actions, issues related to compliance and any known gaps between rules or regulatory requirements and RSN policies.

14. *Compliance Procedures*

We must all work to ensure prompt and consistent action against violations of this Code. However, in some situations it is difficult to know right from wrong. Since we cannot anticipate every situation that will arise, it is important that we have a way to approach a new question or problem. These are the steps to keep in mind:

- (a) *Make sure you have all the facts.* In order to reach the right solutions, we must be as fully informed as possible.
- (b) *Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper?* This will enable you to focus on the specific question you are faced with, and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.
- (c) *Discuss the problem with your supervisor.* This is the basic guidance for all situations. In many cases, your supervisor will be more knowledgeable about the question, and will appreciate being brought into the decision-making process. Remember that it is your supervisor's responsibility to help solve problems. If you are uncomfortable discussing the problem with your supervisor you can talk to the Fraud and Abuse Compliance Officer or the Director of the Public Health and Social Services Department.
- (d) *Seek help from RSN resources.* In a case where it may not be appropriate to discuss an issue with your supervisor, or local management, call (509) 886-6318 Ext. 208 which will put you in direct contact with the RSN Compliance Officer. If you prefer to write, address your concerns to the Compliance Officer, CDRSN, 636 Valley Mall Parkway, Suite 200, East Wenatchee, WA 98802. Anonymous reports can be made by calling (877) 563-3678.
- (e) *You may report violations in confidence and without fear of retaliation.* If your situation requires that your identity be kept secret, your anonymity will be protected. The RSN does not permit retaliation of any kind against employees or officers for good faith reports of suspected violations.

- (f) *Always ask first, act later.* If you are unsure of what to do in any situation, seek guidance *before you act.*
- (g) *All employees and officers are subject to the RSN's Code,* which describes procedures for the internal reporting of violations of the Code. All employees and officers must comply with those reporting requirements and promote compliance with them by others. Failure to adhere to this Code by any employee or officer will result in disciplinary action, up to and including termination.

15. *Annual Acknowledgement*

To help ensure compliance with this Code of Business Conduct, the RSN requires that all RSN employees and officers review the Code of Business Conduct and acknowledge their understanding and adherence in writing on an annual basis on the attached form.

