



## **Our Standards of Conduct:**

### **Commitment to Compliance and Compliance Expectation**

1. Direction Home of Eastern Ohio is committed to comply with all applicable Federal and State standards.
2. All employees and Board members must adhere to this commitment.
3. Compliance is not an option. It is a mandate and everyone's responsibility irrespective of the assigned job functions. Compliant, lawful and ethical conduct is expected from everyone and will be enforced.
4. The Standards of Conduct should be used daily to guide your actions and decisions in the performance of your job duties. In addition to the Standards of Conduct, you must follow Direction Home of Eastern Ohio's policies and procedures while employed at Direction Home of Eastern Ohio. Deviation from the Standard of Conduct, policies or procedures may result in a serious financial, reputational and other harm to Direction Home of Eastern Ohio for which disciplinary action will be imposed.
5. For any questions about the Standards of Conduct, policies or procedures, please contact a member of management, Human Resources, COO or Director of Compliance. The Standards of Conduct aim to cover regulatory standards applicable to Direction Home of Eastern Ohio's operations. They serve to educate the employees about the regulatory requirements to enable them to identify and report potential problems in order for these matters to be addressed and corrected.

### **Compliance with Policies and Procedures**

You are required to comply with these Standards of Conduct and Direction Home of Eastern Ohio's policies and procedures. The Standards of Conduct will be distributed to all employees upon hire and annually. Please locate the applicable policies and procedures by inquiring with your manager. If you have questions about any policies or procedures, please contact the leader of the area to which the policy or procedure pertains or the Compliance Officer. If there is any doubt or concern about the proper way of conducting any activity, you should ask before proceeding.

### **Required Reporting of Non-Compliance**

You **must** report compliance concerns and suspected or actual violations of any laws, regulations, standards, policies or procedures to your manager, Compliance Officer or the hotline. This is a required reporting, but the disclosure of your identity is not. If you prefer to

stay anonymous, please utilize the Compliance Hotline which assures that your identity will not be revealed. You can do so by dialing 1(844)987-0407 or visiting [dheo.ethicspoint.com](http://dheo.ethicspoint.com). If you are unsure whether to report, REPORT. Please note that the requirement pertains to actual as well as suspected violations. We will investigate suspicious activities to determine whether they are substantiated. We will NOT and are legally prohibited from retaliating against a person who reports noncompliance, whether suspected or actual, in good faith.

### **Prohibition of Intimidation and Retaliation for Reporting**

As you are obligated to report any compliance concerns as indicated above, Direction Home of Eastern Ohio is committed to promoting the reporting behavior and building a culture of corporate compliance where concerns are freely reported and promptly addressed. No adverse action, including discipline, demotion, harassment or any other negative employment consequences or penalties will be taken against the employee who reports any non-compliance concerns even if the resulting investigation reveals that they are not substantiated. To gain the protection of the non-intimidation and non-retaliation policy, the reporting must be done in good faith.

### **Investigation and Resolution of Suspected, Detected or Reported Compliance Issues**

All compliance issues regardless of the discovery source will be promptly investigated and addressed. If a compliance issue is reported to a manager, the manager shall contact the Compliance Officer to initiate the investigation. After investigating the issue, the outcome of the investigation will be produced. If substantiated, a corrective action plan will be developed. The corrective action plan will be overseen by the Compliance Officer until corrected with a follow up monitoring plan commencing at the date of the correction.

### **Responsibility of Leaders**

Leaders shall model compliant behaviors and encourage open communication. They should create an environment where employees feel comfortable reporting any non-compliance concerns directly to them. The leaders shall listen actively to their employees' concerns and address them timely. They shall assure that their employees have completed all required trainings and that they possess sufficient information to comply with laws, regulations, policies, procedures and these Standards of Conduct. Never shall a leader retaliate against an employee who in good faith reports non-compliance concerns to the leader in accordance with these standards and policies. Leaders shall work with the Compliance Officer to resolve non-compliance issues.

### **Marketing**

All information included in Direction Home of Eastern Ohio marketing materials will be accurate, truthful, and informative and subject to regulatory review where applicable.

### **Privacy and Confidentiality**

We value privacy and must assure that all documents that contain protected health information are handled consistent with the applicable federal and state privacy laws and regulations including HIPAA. Medical records must be kept confidential and protected from unauthorized uses and disclosures. All authorized or permissible uses and disclosures must be in accordance with the applicable regulations including the minimum necessary requirements. You shall not access any record that contains protected

health information unless there is permissible reason for you to do so. An example would be care coordination of a consumer that is assigned to you. Disposal of protected health information shall be in accordance with HIPAA.

### **Security and Confidentiality**

All electronic protected health information must be handled consistent with the HIPAA Security standards. Use of the laptops and phones must be consistent with the agency's policies and HIPAA. Direction Home of Eastern Ohio provides a secure network for exchange and storage of electronic protected health information which shall be utilized for the purposes. Keep your computers, tablets and any other electronic devices locked, and password protected when not in use. Do not allow anyone access to your password and log in information. Your home office shall be secured in accordance with the Work from Home policy.

### **Fraud, Waste and Abuse and False Claims Act**

Prevention of fraud, waste and abuse has been the focus of the federal healthcare programs, including Medicare and Medicaid for years. While fraud, waste and abuse differ in that some are simple mistakes while others conscious intents, it is important that we pay a close attention to all three as they all result in waste of government funds and care deficiencies. False Claims Act liability arises when a person presents or causes to be presented a claim to the government to pay for items or services that the person knows or should have known is false or fraudulent. If an individual is aware that the False Claims Act is being violated, the individual can bring a whistleblower suit on behalf of the government. Some examples of False Claims Act violations include billing for services not rendered or billing for a higher reimbursable service than those actually rendered. Penalties for False Claims Act violations are steep and can result in termination of an entity from participation in Medicare and Medicaid programs.

### **Anti-kickbacks**

The Anti-kickback statute prohibits soliciting, offering, paying or receiving anything of value in exchange for referrals of Medicare or Medicaid reimbursable items or services. Civil and criminal penalties may be imposed for violations. Do not accept or solicit any gifts from vendors and providers. Gifts of nominal values that can be shared with others in the agency may be accepted, such as cookies for holidays. Likewise, do not offer any gifts to the potential or actual referral sources to induce referrals for services reimbursable by Medicare and Medicaid.

### **The Civil Monetary Penalties Law**

The Civil Monetary Penalties law prohibits offering or transferring anything of value to a Medicare or a State health care program beneficiary that the person know or should know is likely to induce the beneficiary's selection of a particular provider for services for which payment may be made by Medicare or State health care program. You shall not provide any gifts to consumer or offer any services that exceed the services included in the program in which the consumer is enrolled.

### **Use of Corporate Assets**

All property and equipment provided by Direction Home of Eastern Ohio to you to use by you while you are employed at Direction Home of Eastern Ohio is Direction Home of Eastern Ohio's property. It is expected that you will exercise good care in handling the property and equipment. You shall use the property and equipment for the benefit of Direction Home of Eastern Ohio. Upon the termination or resignation of your employment, you must return all property and equipment that you acquired from Direction Home of Eastern Ohio in the course of your employment back to Direction Home of Eastern Ohio.

## **Government Investigations**

Direction Home of Eastern Ohio will comply with all government investigations. If you are approached by a government official or handed a subpoena, court order or any other official document that suggests that Direction Home of Eastern Ohio may be subject to a government investigation, please deliver such document to the Compliance Officer. All government officials shall be referred to the Compliance Officer as well. If the Compliance Officer cannot be reached, please contact the COO who will take the necessary actions to assure compliance with law.

## **Contracts**

All contracts must be in writing and at the minimum include, the description of the services, fees and duration terms. No performance of a contract will be initiated before the contract is reviewed, approved and signed. Monitoring of the contract performance rests with the leader of the area where the contract originated. Any non-compliance concerns should be reported to the Compliance Officer.

## **Ineligible Persons**

Direction Home of Eastern Ohio will not hire or contract with any person or entity that has been excluded from participation in federal healthcare programs including Medicare and Medicaid. Direction Home of Eastern Ohio reviews the list of excluded providers prior to hire/contracting and monthly thereafter. Any employee who learns that they may become ineligible to participate in federal healthcare programs, must promptly report such finding to Human Resources.

## **Copyrighted Material and Proprietary Information**

In the performance of your duties, you will gain access to materials that belong to Direction Home of Eastern Ohio or its vendors. The materials may be copyrighted, trademarked or licensed. Unauthorized use of such materials is strictly prohibited. For example, online access sign on and passwords specific to your use of a particular software shall not be shared with anyone else. Newspaper or educational material subscribed to by Direction Home of Eastern Ohio shall not be copied and shared unless otherwise directed by Direction Home of Eastern Ohio. Likewise, do not share confidential business information of Direction Home of Eastern Ohio for any purpose except as may be necessary for the performance of your job duties as specifically approved by Direction Home of Eastern Ohio. If you would like more examples or need further clarification, please contact the Compliance Officer.

## **Lobby and Political Activity**

Lobbying and political activities that may jeopardize Direction Home of Eastern Ohio tax exempt status must be refrained from. Do not initiate any lobbying or political activities on behalf of Direction Home of Eastern Ohio without an approval by the Compliance Officer. The lobbying and political activity laws are very specific for tax exempt organizations and require an assessment of the activity to determine whether such activity is compliant with the applicable laws. Generally speaking, supporting any political candidate, party, organization, committee or individual implicates this provision and is subject to the required review and approval. Influencing government bodies or officials by improper offers or means is strictly prohibited.