



CODE OF CONDUCT AND ETHICS

- I. **Scope:** Applies to all members of the Community Based Services, Inc. (CBS) community, including its employees, contractors/vendors, volunteers, members of the Board of Directors, as well as those working with or doing business with CBS and its related corporations.
- II. **Purpose:** To establish and clarify a set of standards that requires all members of the CBS community to conform to the highest ethical standards and meet or exceed legal obligations in the performance of their efforts on behalf of CBS.

III. **Policy Statement**

Community Based Services, Inc. enjoys a reputation of integrity and excellence in its programs and business operations. The CBS reputation is one of the organization's most valued assets. CBS is committed to ethical business dealings and embraces the standard of "doing what is right". To this end, we have developed a Code of Conduct and Ethics for the entire CBS community. The appointment and retention of all members of the CBS community is contingent upon acceptance and compliance with this code.

IV. **Procedure**

Elements of the Code

- A. Our Commitment to Ensuring Safety and Respect for the Individuals Supported, the Staff, and the CBS "Brand".

Community Based Services is committed to conducting its programs and services in a manner that places safety as a top priority within its community. It is prohibited to knowingly cause, aid, or otherwise facilitate behavior or events which place the safety of individuals and employees at risk.

Respect is highly valued at the organization. It is prohibited to engage in acts that misrepresent, slander, or otherwise portray in a negative light any individuals supported by CBS, any member of the CBS professional community, and/or the brand and identity of Community Based Services.

- B. Our Commitment to Compliance With the Law

CBS is committed to conducting its programs and services in an ethical manner and in full compliance with all federal, state and local laws and regulations.

All members of the CBS community will adhere to the highest standards of conduct through strict observation of all applicable legal and regulatory requirements. Examples of these standards include but are not limited to the following:

1. CBS will only employ or contract with individuals or entities with proper credentials, experience, and expertise and who are not excluded from federal or state health care programs.
2. All business communications on behalf of CBS with outside individuals or entities, including claims for payment or reimbursement of any kind, will be truthful and, where appropriate substantiated by accurate and complete records.
3. CBS, its employees or agents, are prohibited from paying any individuals, including physicians and other health care professionals, directly or indirectly, in cash or by any other means, for referrals of clients/individuals.
4. Employees or agents who perform billing and/or coding of claims must take every reasonable precaution to ensure that their work is accurate, timely, and in compliance with federal and state laws and regulations and CBS' policies.
5. Claims for payment or reimbursement that are suspected to be false, fraudulent, inaccurate, or fictitious may not be submitted. Falsification of billable service activity, staff time, or other recorded information used for supporting submitted claims will not be tolerated. CBS will bill only for services actually rendered and which are fully documented in the records/charts.
6. Upon discovery, CBS shall act promptly to investigate and correct any errors in submitted claims.

C. Our Commitment to Ethical Behavior

All members of the CBS community will adhere to the highest ethical standards of behavior while performing CBS business, including preparing and maintaining accurate and complete records, and truthful communications with other members of the CBS community and with government and private agencies and individuals doing business with CBS.

1. CBS seeks positive relationships with government programs and third party payers. Positive relationships require ongoing communication about individual progress and billing.
2. Employees or agents shall not use or reveal any confidential information concerning CBS or use, for personal gain, confidential information obtained as an employee or agent of CBS.
3. No employee or agent should subordinate his or her professional standards, judgment, or objectivity to any person. If significant differences of opinion in professional judgment occur, then the persons involved should be referred to management for resolution.
4. Employees and agents should be honest and forthright in any representations made to individuals, vendors, payers, other employees or agents, and the community.

5. All reports or other information required to be provided to any federal, state or local government agency shall be accurate, legible, complete, and filed on time.
6. Employees and agents must perform their duties in a way that promotes the public's trust in CBS.
7. Employees and agents shall be honest in doing their jobs.

D. Our Commitment to Continuous Training and Improvement

CBS is committed to the professional development of the entire CBS community. All members of the CBS community will have access to all applicable laws, rules, regulations, policies and procedures necessary for them to perform on behalf of CBS, and will be regularly trained on those laws, rules, regulations, policies and procedures, as well as the Corporate Compliance Program.

E. Our Commitment to Serving CBS in a Manner Free of Conflict of Interest

CBS is committed to clarity of our mission and purpose, free of any appearance of conflict or impropriety. CBS itself will not pursue any business opportunity or take any other action that will require it to engage in illegal or unethical behavior, or is reasonable likely to fall outside of CBS' mission, purpose or authorization.

1. In all of their activities on behalf of CBS, all members of the CBS community will act in a manner consistent with the CBS mission and purpose, and consistent with the CBS reputation for integrity and excellence. Each member of the CBS community will ensure that no activity takes place that in any way jeopardizes the tax exemption status, licenses, reputation or governmental authorizations of CBS.
2. All members of the CBS community will accomplish their business on behalf of CBS without engaging in any business, professional or personal activity that would create a conflict of interest or any appearance of a conflict of interest without appropriate disclosure and advance approval by the Board of Directors or the CEO/designee.
3. Placing business with any firm in which there is a family relationship may constitute a conflict of interest. Advance disclosure and approval are required in such a situation.
4. Employees and agents should not become involved, directly or indirectly, in outside commercial activities that could improperly influence their actions. For example, an employee or agent should not be an officer, director, manager, or consultant of a potential competitor, customer, or supplier of CBS without first disclosing that relationship to management.
5. Employees and agents should not accept or provide benefits that could be seen as creating conflict between their personal interests and CBS' legitimate business interests.
6. Employees and agents should report any potential conflicts of interest concerning themselves, co-workers or family members to management.

F. Our Commitment to Respecting Property Rights

CBS is committed to respecting the property rights of all those with which we do business. In their actions on behalf of CBS, all members of the CBS community will act in a manner consistent with this respect of property of others.

1. Each member of the CBS community will ensure that all applicable laws, standards and policies regarding the confidentiality of CBS records are upheld.
2. Each member of the CBS community will ensure that all private information owned by others, but in the custody and possession of CBS, be held in confidence and not utilized outside of the use contemplated by the owner of the information without the express permission of the owner. This includes a prohibition against unauthorized use and/or copying of the computer software not contained in the license granted to CBS and installation of unauthorized software on CBS computers. Employees shall take all reasonable steps to protect computer systems and software from unauthorized access or intrusion.
3. All employees and agents are personally responsible and accountable for the proper expenditure of CBS funds and for the proper use of the agency's property.
4. All employees and agents must obtain authorization prior to committing or spending CBS funds.
5. Employees and agents may not use CBS' or a person receiving services' resources for personal or improper purposes, or permit others to do so.
6. Surplus, obsolete or junked property shall be disposed of in accordance with CBS' procedures. Unauthorized disposal of property is a misuse of assets.
7. Any improper financial gain to the employee, or agent, through misconduct involving misuse of CBS' or a person receiving services' property is prohibited, including the outright theft of property or embezzlement of money.
8. CBS' confidential and proprietary information is valuable, and should be protected from unauthorized use or exploitation. Employees and agents are expected to respect the intellectual property rights of others with whom we do business.
9. Employees and agents are expected to report any observed misuse of CBS' property to management.

G. Our Commitment to Protecting Privacy and Confidentiality

Information that is entrusted to those who do business on behalf of CBS is confidential and privileged. This includes information related to our individuals supported, management, financial matters, personnel matters, and any future strategic plans of the organization as a whole.

CBS is committed to protecting privacy and confidentiality. The adherence to the privacy rules promulgated under state and federal laws (including HIPAA and HITECH provisions) is a priority at CBS.

All reports of suspected violations to the Code of Conduct and Ethics will be fairly, thoroughly, and promptly investigated.