

CODE OF ETHICS

Introduction

HealthWest is committed to a continuing effort to maintain principles of ethical business conduct. To accomplish this, HealthWest has developed a system-wide Corporate Compliance Program. This program has been reviewed and approved by the Board of Directors of HealthWest. The purpose of this program is to ensure that HealthWest and its affiliates, employees, contractors and individuals conduct their operations and provide services in a manner consistent with the mission and vision statements and with all applicable federal and state laws and regulations. The program consists of a mechanism for reporting, investigating, monitoring and responding to potential, threatened or actual violations of federal or state law. The program is intended to serve as a vehicle for HealthWest on an ongoing basis to educate its employees and police itself, in order to prevent any violations of law from occurring and/or to minimize the impact, exposure of liability of any such actions.

All employees are expected to report violations of any Federal Health Care Program, including the Federal and Michigan False Claims Acts, or other Federal or State funded program requirements to the Corporate Compliance Officer. Failure to reasonably detect and report a violation is itself a violation of the Program.

Business will be conducted in good faith, with integrity and in accordance with these ethical standards. Adherence to such standards should never be traded or compromised for financial, professional or other business objectives. This obligation includes dealing honestly with other health care providers, educational institutions, payors, internal and external customers, suppliers, competitors and financial partners.

Business decisions will be based on the corporate mission, strategic plan and HealthWest resources. They will take into consideration the behavioral health care needs of the community served by HealthWest with care given to avoid duplication of services and services that are unnecessary or non-efficacious. As we work to provide care in a more cost-effective manner, we will strive to provide care that meets our standards. HealthWest will not be wasteful in the utilization of its resources. HealthWest will obey all relevant laws, regulatory standards and ethical codes.

HealthWest depends on employees to fulfill its responsibility to individuals and the community it serves. Ethical care and business practices are essential elements in guiding its operations. The Code of Ethics defines the expected ethical behavior of employees. All employees of HealthWest commit themselves to conduct their professional relationships in accordance with this statement and agree that they will:

I. Responsibilities to Individuals Receiving Services

- A. Adhere to the policies and procedures of the Agency including the following:
 - 1. Discrimination or Refusal of Professional Services
 - 2. Confidentiality
 - 3. Recipient Rights
 - 4. Consumer Bill of Rights

- B. Respect the choice of persons served in all aspects of their lives.

- C. Respect the dignity of all persons served by avoiding dual personal, clinical, and/or supportive relationships, sex or intimate touch with individuals receiving services.
- D. Protect and preserve clinical relationships by not lending money, borrowing money or becoming a guardian for non-family members who are individuals receiving HealthWest services.
- E. Ensure personal and professional competence by continuing to develop skills and knowledge and applying them to work activities.
- F. Provide diagnosis, treatment or advice on problems only within the employee's recognized scope of practice.
- G. Respect and value all persons' religious beliefs, personal and spiritual values and cultural practices. Staff will not engage in religious proselytization with consumers.
- H. Ensure that all persons are provided mobility supports and any other supports included in the Person-Centered Plan.
- I. Assist those consumers with limited English proficiency so that services may be accessed.
- J. Do not accept any gifts of value given by individuals receiving services, their families, advocates or guardians.
- K. In the appropriate treatment settings, advanced directives of the individual receiving services will be honored. If a consumer seeks information about advanced directives, employees shall provide information and take reasonable steps to safeguard the individual's best interests and rights.
- L. The Agency will not disclose any medical information about individuals served without a signed authorization for the use and disclosure of protected health information as required under the Health Insurance Portability and Accountability Act of 1996.
- M. Respect the dignity of the family members of the person served in all interactions.

II. Responsibilities to Co-workers

- A. Respect the views of co-workers and treat them with fairness, courtesy, and good faith.
- B. Report through supervisory channels any staff that engages in harassment, discrimination, or presents themselves as competent to do services beyond their training and/or level of experience.
- C. Suspend assumptions, act as colleagues and adopt the spirit of inquiry by exploring the thinking behind their views and the evidence that they have that leads to these views.
- D. Staff will not engage in religious proselytization during working hours.
- E. HealthWest will not discharge, demote, suspend, threaten, harass, or otherwise discriminate against an employee because the employee initiates, assists, or participates in a proceeding or court action under the Michigan False Claims Act as well as the Federal False Claims Statutes.

III. Responsibilities to Employer

- A. Adhere to all Agency policies, procedures and practices.
- B. Work to improve the effectiveness and efficiency of services provided by the Agency by embracing the principles and practices of quality improvement.
- C. Do not accept any gifts from vendors, providers or other contractors that would result in an implied or direct promise of reciprocity.
- D. Demonstrate respect and adhere to Agency policies, procedures, practices and management decisions.
- E. Support the integrity and enhance the reputation of the Agency. Be positive in words and actions toward the Agency.
- F. Critically review requests from vendors or subcontractors to participate in any type of promotional efforts to limit the possibility of a potential conflict of interest.
- G. Distinguish personal views and actions from those authorized as representatives of HealthWest.
- H. Obtain approval from the Director or designee prior to making any public statement to the media as representatives of HealthWest.
- I. Report all known or suspected compliance issues to the Corporate Compliance Officer, including any fraud, abuse, or misconduct as identified in the Michigan False Claims Act as well as the Federal False Claims statutes.
- J. Conduct job duties in a manner that demonstrates commitment to compliance with all applicable laws and regulations.
- K. Strive to prevent errors and provide suggestions for change to eliminate errors.
- L. Donations from vendors, contractors or providers may be accepted to benefit the consumers of the Agency as a whole. Donations may not be accepted to benefit one employee.
- M. Adhere to all billing and documentation standards without knowingly or willfully providing false or misleading information.
- N. Document services without misrepresentation of the service provided, duration or outcome.
- O. Authorize and provide services according to generally accepted mental health and managed care practices.
- P. Ensure communications about offered services and products are accurate, fair and true. Accurately portray those services and products, which are available in the network.
- Q. Conduct business with vendors, contractors and other third parties free from offers of or requests for gifts and favors.

- R. Apply the principal of confidentiality to all aspects of our business and relationships with consumers and co-workers. Follow the appropriate procedures for the release of protected health information for consumers and co-workers.
- S. Obtain written authorization for use of photography or testimonials prior to use.
- T. Use license, certification and accreditation information according to the standards and requirements established by the Agency from which the information was obtained.
- U. Ensure that marketing materials regarding programs, outcomes of services, costs for services, credentials of clinical providers, or benefits offered are not false or misleading.
- V. Refrain from negative statements about competitors.
- W. Refrain from high-pressure techniques or manipulation in promoting services and programs.
- X. Refrain from plagiarizing the publications or media of others. Publications or media materials of other agencies or corporations are used when appropriate consent has been obtained or compensation is provided to the owner.
- Y. Provide information to a consumer individual receiving services that allows them to authorize the removal of their name from the mailing list for marketing materials.
- Z. Follow agency policies regarding the use of social media and avoid any social media activities that could cross professional-consumer boundaries, violate consumer privacy, reveal inappropriate details of staffs' personal lives to consumers or jeopardize the therapeutic relationship.

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