	Shasta County Health and Human Services Agency Managed Care, Compliance & Quality Management
	Code of Conduct

1.0 **Persons/Programs Affected** *(Check all that apply)*

☒ All Staff	☐ All Managers	☐ All Supervisors	

*Each branch to have unique Persons/Programs Affected
All employees include all employees–full-time, part-time and extra-help.

2.0 **Definitions**

Covered Individuals refers to all Shasta County Health and Human Services Agency (HHSA) employees, contractors, and individuals with responsibility pertaining to the ordering, provision, documentation, coding or billing services payable by a Federal health care program for which HHSA seeks reimbursement and the services are performed under the agreement between Shasta County and Department of Health Care Services Managed Care Plan.

Off-Site Contractor Providers refers to Covered Individuals who contract with HHSA (or who are employed by or subcontracted with a person or entity who contracts with HHSA) to provide services at locations that are not owned or leased by HHSA.

3.0 **Policy**

The Shasta County HHSA Code of Conduct provides guidance to all Covered Individuals and Off Site Contractor Providers in order to carry out daily activities within appropriate ethical standards and applicable laws and regulations.

4.0 **Procedure**

All Covered Individuals are required to receive, understand, sign and adhere to the HHSA Code of Conduct.

The Code of Conduct shall set forth the following:

A. HHSA's commitment to full compliance with all statutes, regulations, and guidelines applicable to Federal health care programs, including HHSA's commitment to prepare and submit accurate claims consistent with such requirements;

B. HHSA's commitment that all Covered Individuals shall be expected to report suspected violations of any statute, regulation, or guideline applicable to Federal

health care programs and with HHSA's policies and procedures, to a supervisor, the Shasta County Compliance Officer, or through the toll-free confidential Compliance Disclosure line;

C. The possible consequences to HHSA and to any Covered Individual of failure to comply with all statutes, regulations, and guidelines applicable to Federal health care programs and with HHSA's policies and procedures or of failure to report such non-compliance;

D. The right of all Covered Individuals to use the Confidential Disclosure Line, as well as HHSA's commitment to confidentiality and non-retaliation with respect to disclosures.

The Compliance Officer shall ensure all Covered Individuals have received, signed, and been trained on the Code of Conduct.

All HHSA Covered Individuals are required to sign the Code of Conduct.

A. For employees of HHSA, failure to sign the Code of Conduct or to adhere to the rules of the Code of Conduct is in violation of HHSA policy. Disciplinary action in accordance with Shasta County Personnel Rules and/ employee bargaining units Memorandums of Understanding, up to and including dismissal, , will be applied.

B. For Off Site Contracted Providers, failure to sign the Code of Conduct or to adhere to the rules of the Code of Conduct is in violation of HHSA policy and may result in, up to and including, termination of contract, fiscal penalties and the inability to contract with HHSA.

Procedures for Off-Site Contracted Providers

A. HHSA will require in its contracted entities that have Covered Individuals:
   a. Off-Site Contracted Providers shall acknowledge HHSA's Compliance Program and Code of Conduct;
   b. The Code of Conduct is provided to all Off-Site Contracted Providers;
   c. The Off-Site Contracted Providers shall obtain and retain (subject to review by HHSA) signed certifications that each Off Site Contractor Provider has received, read, and understands the HHSA Code of Conduct and agrees to abide by the requirements of HHSA's Compliance Program.

References and Citations
U.S. Sentencing Guidelines §8B2.1 (Effective Compliance &Ethics Program)

5.0 Attachments
Shasta County HHSA, Mental Health Plan Code of Conduct

6.0 Revision History

Date	No.	Action:
05/27/2014	2014-19	Adopted

7.0. Other Agency Involvement
N/A

8.0 Authorization/Signatures
The above policy and procedure has been reviewed and is authorized for immediate implementation:

Donnell Ewert, MPH, Director — Date: 5/30/14

Micki Mills, Program Manager, Business & Support Services
Compliance Officer
Managed Care Compliance Program — Date: 5/29/2014

SHASTA COUNTY HEALTH AND HUMAN SERVICES, MENTAL HEALTH PLAN (MHP) CODE OF CONDUCT

Shasta County Health and Human Services (HHSA), maintains high ethical standards and is committed to complying with all applicable statutes, regulations, and guidelines. HHSA and each of its employees and contractors shall follow this Code of Conduct as applicable to services performed under the agreement between Shasta County and the State Department of Health Care Services Managed Care Plan agreement.

1. PURPOSE

The purpose of the HHSA Code of Conduct is to ensure that all HHSA employees and contractors providing services under the Shasta County Managed Care Plan (the agreement between Shasta County and State of California Department of Health Care Services to provide specialty mental health services to eligible Shasta County Medi-Cal beneficiaries), are committed to conducting their activities ethically and in compliance with all applicable state and federal statutes, regulations, and guidelines applicable to Federal Health Care programs, and with all related HHSA Policies and Procedures. This Code of Conduct also serves to demonstrate HHSA's dedication to providing quality care to its patients, and to submitting accurate claims for reimbursement to all payers.

2. CODE OF CONDUCT - GENERAL STATEMENT

A. The Code of Conduct is intended to provide HHSA employees and contractors with general guidelines to enable them to conduct the business of HHSA in an ethical and legal manner;

B. Every HHSA employee and contractor is expected to uphold the Code of Conduct;

C. Failure to comply with the Code of Conduct, or failure to report reasonably suspected issues of non-compliance, may subject the HHSA employee or contractor to disciplinary action, up to or including termination of employment or contracted status. In addition, such conduct may place the individual, or HHSA, at substantial risk in terms of its relationship with various payers. In extreme cases, there is also the risk of action by a governmental entity up to and including an investigation, criminal prosecution, and/or exclusion from participation in the Federal Health Care Programs.

3. CODE OF CONDUCT

All HHSA employees and contractors:

A. Shall perform their duties in good faith and to the best of their ability;

B. Shall comply with all statutes, regulations, and guidelines applicable to Federal Health Care programs, and with HHSA's own Policies and Procedures;

C. Shall refrain from any illegal conduct. When an employee or contractor is uncertain of the meaning or application of a statute, regulation, or policy, or the legality of a certain practice or activity, he or she shall seek guidance from his or her immediate supervisor or the designated Compliance Officer;

D. Shall not obtain any improper personal benefit by virtue of their employment or contractual relationship with HHSA.

E. Shall notify the Compliance Officer immediately upon the receipt (at work or at home) of any inquiry, subpoena, or other agency or government request for information regarding HHSA;

F. Shall not destroy or alter HHSA information or documents in anticipation of, or in response to, a request for documents by any applicable government agency or from a court of competent jurisdiction;

G. Shall not engage in any practice intended to unlawfully obtain favorable treatment or business from any entity, physician, patient, resident, vendor, or any other person or entity in a position to provide such treatment or business;

H. Shall not accept any gift of more than nominal value or any hospitality or entertainment, which because of its source or value, might influence the employee's or contractor's independent judgment in transactions involving HHSA;

I. Shall disclose to the Compliance Officer any financial interest, official position, ownership interest, or any other relationship that they (or a member of their immediate family) has with HHSA's vendors or contractors;

J. Shall not participate in any false billing of patients, government entities, or any other party;

K. Shall not participate in preparation of any false cost report or other type of report submitted to the government.

L. Shall not pay or arrange for HHSA to pay any person or entity for the referral of patients to HHSA, and shall not accept any payment or arrange for HHSA to accept any payment for referrals from HHSA;

M. Shall not use confidential HHSA information for their own personal benefit or for the benefit of any other person or entity, while employed at or under contract to HHSA, or at any time thereafter;

N. Shall not disclose confidential medical information pertaining to HHSA's patients without the express written consent of the patient or pursuant to court order and in accordance with the applicable law and HHSA applicable Policies and Procedures;

O. Shall promptly report to the Compliance Officer any and all violations or reasonably suspected violations of the Code of Conduct by other employees or contractors;

P. Shall promptly report to the Compliance Officer any and all violations or reasonably suspected violations of any statute, regulation, or guideline applicable to Federal Health Care programs or violations of HHSA's own applicable Policies and Procedures by other employees or contractors;

Q. Shall have the right to use the Confidential Disclosure Program without fear of retaliation with respect to disclosures; and with HHSA's commitment to maintain confidentiality, as appropriate; and

R. Shall not engage in or tolerate retaliation against employees or contractors who report suspected wrongdoing.

4. SHASTA COUNTY COMPLIANCE OFFICER

The Shasta County Compliance Officer may be contacted at:

Compliance Officer
Shasta County Health and Human Services Agency, Business & Support Services
1810 Market Street
Redding, CA 96001
(530) 245-6750

24/7 Confidential Disclosure Line:
(530) 229-8050 or 1-866-229-8050

Website Address:
http://www.co.shasta.ca.us/html/Mental_Health/About%20Us/About%20Us.htm

Email:
mhcompofcr@co.shasta.ca.us

Shasta County Health & Human Services Agency (HHSA)

CODE OF CONDUCT CERTIFICATION

I, _____ by signing this Certification
(Print First and Last Name)
acknowledge that:

1. I have received a copy of the Code of Conduct;
2. I have read and received training on the Code of Conduct; and
3. I agree to comply with the Code of Conduct.

Signed _____ Date _____

Please turn in this signed certification to Compliance Program staff.

Thank you.