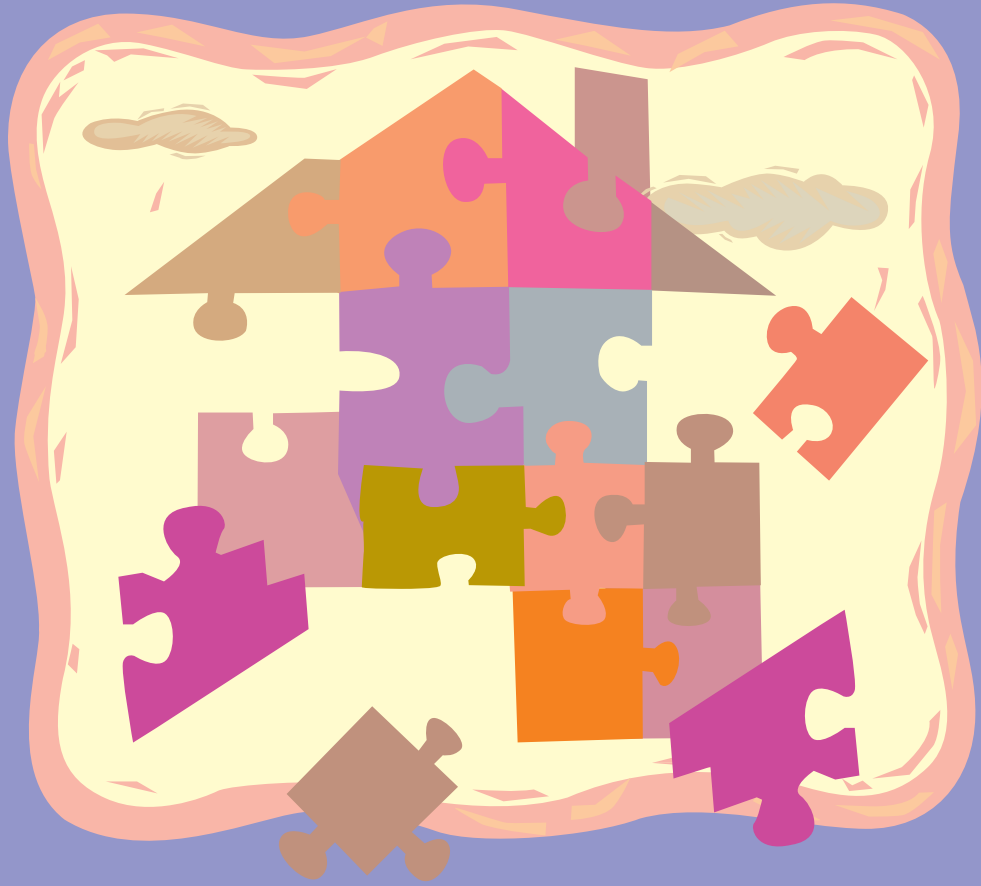
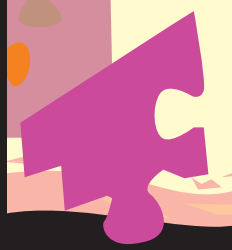


# Highland Rivers CSB Code of Conduct





**If you are concerned, we are concerned.**



# A Word from the CEO

**Dear Highland Rivers CSB Employee, Business Associate,  
Medical Staff Member and Board of Directors Member:**

It is of the utmost importance that Highland Rivers CSB fulfills its mission of providing treatment and support services to persons with disabling effects of mental illness, mental retardation and substance abuse. It is because of this mission that Highland Rivers CSB is committed to a culture of conducting all aspects of business in an ethical and legal manner. It is essential that this business culture is continued, valued and exemplified by every member of Highland Rivers CSB's team.

We are very proud to present this business Code of Conduct which provides guidance to the Highland Rivers CSB team for appropriate business practice. The Code of Conduct is the foundation of our Corporate Compliance Program implemented by Highland Rivers CSB to promote ethical and legal conduct in all facets of our business. The Board of Directors has endorsed this Code of Conduct and the appointment of a Compliance Committee to oversee Highland Rivers CSB Compliance Program.

We have provided several avenues to raise compliance-related issues or concerns, including Highland Rivers CSB's open-door policy that encourages direct discussions with supervisors or other managers. If you find that these avenues are insufficient to address compliance-related concerns, you may also call Highland Rivers CSB's Compliance Hotline (1-800-690-7430). The Hotline is confidential and has been developed to maintain the caller's

anonymity up to the limits of the law. We can assure you that there will be no retaliation or retribution against any employee for reporting problems to the Hotline.

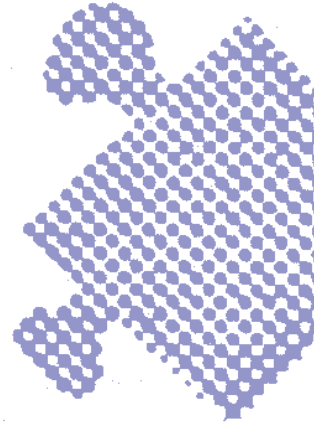
Please review the Code of Conduct and apply the standards in your work. If you have any questions, please discuss them with your supervisor, any member of the compliance committee, the compliance officer or call Hotline.

We appreciate your continued efforts and dedication to maintain Highland Rivers CSB's professional reputation and success as we continue to grow and meet the behavioral health needs of our community.

Yours truly,

*Klay Weaver*

Klay Weaver, CEO  
Highland Rivers CSB



# Table of Contents

## ***Corporate Compliance Introduction***

- Compliance Program Structure 4
- Key Elements of the Program 4
- Corporate Compliance Committee 5
- Corporate Compliance Officer 5
- Responsibilities of Management 6

## ***Creating a Culture for Compliance***

- Creating a Corporate Culture 7
- Highland Rivers CSB's Commitment 7

## ***Highland Rivers CSB Code of Conduct***

- Quality 8
- Agreements with Independent Contractors 8
- Consumer Rights 8
- Conflict of Interest 9
- Anti-Fraud and Abuse, Gifts and Favors 9
- Financial Practices, Billing and Record Keeping 10
- Confidential Information 10
- Record and Document Retention 10
- Compliance 10
- Human Resource Policies 11
- Government Requests for Information 11
- Corporate Resources 11
- Responsible Use of Computers and Computer Software 11
- Political Activities 12
- Employee Relations 12
- Controlled Substances 12
- Reporting Misconduct 12

## ***Getting Answers to Ethics and Compliance Questions***

- Important Contact Phone Numbers 13

## ***Code of Conduct Certification of Compliance***



# Corporate Compliance Introduction

In keeping with Highland Rivers CSB's Compliance Initiative and upon the direction of the Board of Directors, a Corporate Compliance Program has been developed. Highland Rivers CSB is committed to maintaining a reputation of conducting all business transactions in an ethical manner and in accordance with all applicable law.

The Corporate Compliance program is meant to consolidate ethical and professional standards already required and in place at Highland Rivers CSB. Compliance efforts are designed to maintain a culture that promotes prevention, detection and resolution of instances of conduct that do not conform to federal and state law and federal, state and private payor healthcare program requirements, or other regulations, as well as Highland Rivers code of conduct and policies. This code establishes the standards for all agents of the Board under the program.

## ***Compliance Program Structure***

Highland Rivers CSB has adopted a policy of corporate responsibility and will require board of director members, officers, employees, volunteers, agents and contractors of Highland Rivers CSB to comply with business and professional standards of conduct; federal, state and local laws and regulations; standards of accrediting bodies; and tenets of good corporate citizenship.

The Compliance program shall be maintained under the authority of the Highland Rivers CSB Board of Directors. The daily oversight of the program is

performed by the Corporate Compliance Officer with guidance from the Corporate Compliance Committee.

## ***Key Elements of the Program***

- Adoption of the Code of Conduct
- Preparation and approval of a written Compliance Plan that incorporates business and professional standards of conduct, federal, state and local laws and regulations and standards of accrediting bodies including Highland Rivers CSB's commitment to accurate billing consistent with published Medicare and Medicaid regulations and procedures and applicable guidelines
  - Appointment of a Compliance Officer and Compliance Committee charged with the responsibility of operating and monitoring the corporate compliance program reporting directly to the Chief Executive Officer and the Board of Directors
  - Development of communication and education procedures including the posting and distribution of information concerning the program to all directors, officers, employees, volunteers, agents, and contractors
  - Ongoing maintenance of a hotline to receive complaints, and the adoption of procedures to respond to complaints and protect the anonymity of complainants and to protect whistleblowers from retaliation
  - Development of a system to respond to allegations of improper or illegal activities, and the enforcement of appropriate disciplinary action against employees who have violated internal compliance policies, applicable laws, regulations, or federal healthcare program requirements
  - Implementation of a system of monitoring, auditing and reviewing

operations and the program and the information and statistics compiled through the program.

- Development of procedures for disclosure, reporting and corrective action
- Investigation and remediation of identified systemic problems and the development of policies addressing the non-employment or retention of sanctioned individuals
- Engagement of independent contractor(s) to perform an annual review of the Compliance Program and business practices
- Quarterly reports regarding the operation of the program and an annual report evaluating the program's overall effectiveness to the Board of Directors

### ***Corporate Compliance Committee***

The Corporate Compliance Committee is designated to provide overall direction, implementation, and supervision of the requirements of the Program. The Corporate Compliance Committee is chaired by the Compliance Officer and is responsible for designing policies and procedures to assure ethical and legal compliance and reviewing specific compliance issues and responses to same. All policies developed by the Compliance Officer with assistance of the Compliance Committee are subject to Highland Rivers CSB Board of Directors approval. The Compliance Committee has the responsibility to periodically update the program and distribute memorandums and/or policy statements updating provisions of the program.

The Compliance Committee may delegate duties to other subcommittees or work teams of the Compliance Committee that may include other members of Highland Rivers CSB staff. Committee responsibilities include but are not limited to the following:

- Oversight and development of the Compliance Program under the direction of the Compliance Officer
- Providing guidance with regard to operation of the Compliance Program
- Evaluating results of the annual program review
- Determining annual focus areas for the Compliance Program
- Reviewing reports of disclosures, reports and other communications obtained through the Program
- Review and selection of compliance objectives
- Review of Program policies
- Review recommendations for corrective action

### ***Corporate Compliance Officer***

The Highland Rivers CSB Compliance Program will be maintained and operated by the Corporate Compliance Officer. The Compliance Officer is appointed by the Chief Executive Officer and approved by the Board of Directors. The Compliance Officer shall be responsible for the following:

- The development, implementation and maintenance of the program
- Chairing the Corporate Compliance Committee
- Operational review of the program and related audits, reviews and reports
- Preparation of reports to Highland Rivers CSB Board of Directors, the Corporate Compliance Committee, other Highland Rivers CSB committees and Highland Rivers CSB administration
- The development of educational requirements of the Program
- The monitoring of new laws, regulations and trends with regard to Corporate Compliance activities
- Reviewing audits, reviews and reports prepared by independent contractor(s)

- Organization and maintenance of all documentation regarding Program activities
- Inform employees of timely program updates, policy changes and responses to changes and new developments in the law

### ***Responsibilities of Management***

All levels of management have the primary responsibility to set Highland Rivers CSB's standard for compliance. Directors/managers serve as the primary example for, and an important source of information to, Highland Rivers CSB staff. Directors/managers must communicate the importance of compliance to every employee and actively promote adherence to the compliance program. Informally, directors/managers must foster open communications about compliance and direct all compliance questions raised by employees to the Corporate Compliance Officer and Committee. Certain directors/managers under the direction of the Compliance Officer will be called upon to give formal presentations to employees explaining the compliance program and instructing employees how to deal with various compliance related issues.

All directors/managers must ensure that all actual or potential compliance issues are reported to the Corporate Compliance Officer or Committee. In addition, all directors/managers must be accessible to employees who wish to report compliance issues. Directors/managers also have the responsibility to ensure that no employee is retaliated against, in any way, for reporting a compliance issue.

Managers are equally accountable for their own actions as well as the action of the employees that they supervise. Each director/manager will annually certify that the director/manager has reviewed the compliance program and that the director/manager fully understands it.

Additionally, each manager's support of, and discharge of, compliance obligations and efforts toward implementing the compliance program will be evaluated annually as a part of their annual performance evaluation. Each director/manager must create an atmosphere that encourages compliance and fosters reporting of non-compliance as well as seeking the assistance of the Corporate Compliance Officer and Committee.

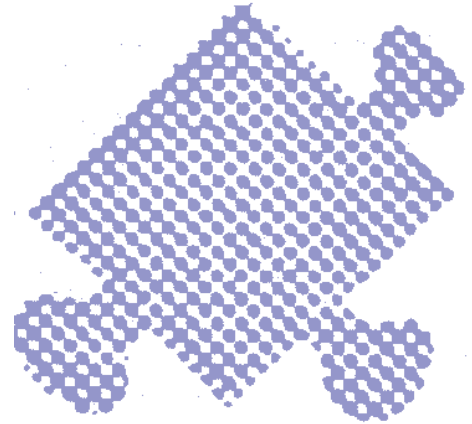
# Creating a Culture for Compliance

## ***Creating a Corporate Culture***

Creating and reinforcing a corporate culture that embraces compliance is of utmost importance to the Highland Rivers CSB Board of Directors. This culture will thrive only if employees learn about the compliance program and have access to it. Therefore, in addition to providing ample compliance training, Highland Rivers guarantees access to the Compliance Program. Employees will have multiple access points, including the Corporate Compliance Office, Corporate Compliance Committee, the Corporate Compliance Hotline and several different management level employees to whom they may make reports, ask questions or seek information.

## ***Highland Rivers CSB's Commitment***

Highland Rivers is committed to ensuring that the Program is fully implemented. A comprehensive educational program is provided upon orientation and annually thereafter to all employees. The Board shall work to insure that each employee recognizes what is expected under the Program, abides by these expectations and recognizes situations that could lead employees or others to violate these expectations.



# Highland Rivers CSB Code of Conduct

## **Quality**

Highland Rivers CSB is committed to making the delivery of quality care the primary consideration in every aspect of business. Quality is the driving force of all of Highland Rivers CSB employee's/clinician's decisions and actions. Each employee/clinician must strive to provide appropriate services and to achieve the best attainable outcome for consumers. Highland Rivers is committed to providing care in strict compliance with all applicable laws, regulations and standards related to consumer care.

Highland Rivers will ensure that employees and agents have the appropriate qualifications to provide consumer services and perform their job duties professionally and in a manner consistent with Highland Rivers' standards.

The effectiveness of the Program depends on each employee's willingness to bring all compliance issues to the attention of the employee's Director or Manager. If an employee is unsure as to whether or not a particular situation raises a compliance issue, they are instructed to err on the side of caution by reporting it. In other words, *when in doubt, point it out!*

## **Agreements with Independent Contractors**

Highland Rivers is committed to maintaining integrity and quality in all aspects of its business, even when services are provided on Highland Rivers' behalf by independent contractors. Independent contractors must agree to adhere to laws and regulations applicable to the service(s) provided, as well as to Highland Rivers' policies and procedures. When independent contractors

provide consumer care on Highland Rivers' behalf, Highland Rivers will require proof of licensure, certification or other evidence of provider competency, as required by Highland Rivers policy and law. Highland Rivers Board will only contract with third parties who have not been excluded from the Medicare and/or Medicaid programs or convicted of a federal healthcare program offense.

## **Consumer Rights**

Highland Rivers is entrusted with the care of its consumers. It is the policy of Highland Rivers that each consumer is treated as an individual and is afforded dignity, consideration and respect. Highland Rivers CSB will not tolerate any type of consumer abuse or neglect. Each employee is responsible for reporting to a supervisor any instances of observed or suspected neglect or abuse. It is also Highland Rivers policy that consumers and their legally authorized representatives have the right to participate in decisions about their care and treatment. These rights include the right to participate in decisions regarding the consent to and refusal of care and treatment. Highland Rivers employees should always respect the rights of consumers to participate in decisions regarding their care and treatment.

Highland Rivers CSB will respond to consumer concerns or complaints regarding their care and treatment while participating in care and treatment at Highland Rivers CSB facilities. Highland Rivers Managers/Directors should be notified and all issues reviewed, investigated and responded to in a timely manner.

### ***Conflict of Interest***

Highland Rivers CSB employees, medical staff, management and Board of Directors are expected to exhibit professional loyalty to the organization and to avoid situations where personal interests are, or appear to be, in conflict with Highland Rivers CSB's interests. Opportunities for personal gain for themselves individually, members of their immediate families and others are to be avoided except as permitted by law because these conflicts could interfere with ethical business judgment. Examples of situations where conflicts of interest may exist include, but are not limited to, the following unless permitted by law:

- An employee accepts outside employment in an organization that does business with Highland Rivers CSB or is a competitor of Highland Rivers CSB.
- An employee or an immediate family member possesses a financial interest in a firm that does business with Highland Rivers CSB or is a competitor of Highland Rivers CSB, where the interest is sufficient to potentially affect decisions or actions.
- An employee or an immediate family member uses for personal gain or benefit of others any confidential information obtained in the course of employment at Highland Rivers CSB.
- An employee or an immediate family member appropriates for personal use the benefit of any Highland Rivers CSB business venture which the employee learns about in the course of employment at Highland Rivers CSB.
- An employee accepts gifts from any person or firm doing business or seeking to do business with Highland Rivers CSB under circumstances where it appears that the purpose of the gift may be to influence the conduct of organization business with the donor.

Employees are required to disclose any conflict of interest, including potential conflicts, to their supervisor/manager/director.

### ***Anti-Fraud and Abuse, Gifts and Favors***

Monetary gifts or any favors in attempt to gain unfair influence or advantage are never acceptable. Employees will not use gifts and gratuities, bribes or kickbacks to induce others to purchase Highland Rivers CSB services or refer clients to Highland Rivers CSB facilities.

To ensure compliance with applicable laws, all agreements with referral sources must be in writing and approved by counsel. Highland Rivers CSB's policy is that contracts with physicians or other referral sources not already pre-approved by counsel of Highland Rivers must be submitted for legal review before the agreements are finalized. Any employee who has a question or concern about whether a transaction is permissible under these laws should consult a manager/director or the Corporate Compliance Office.

Failure to comply with these laws and policies can result in serious sanctions for Highland Rivers and individual employees, including substantial fines or imprisonment for the individuals involved.

When gifts or items of value are offered from someone outside the organization, there may be a concern that the donor's motivation is improper, such as expecting to receive some special treatment in return for the gift. Therefore, employees are not permitted to accept gifts or gratuities of more than nominal value from vendors or others doing business with Highland Rivers CSB.

Nominal value means a gift or gratuity worth no more than \$ 25.00 from any one person or company in any 12-month period. Gifts or gratuities offered exceeding nominal value should be politely refused. Employees or members of their respective immediate families should not have substantial financial or business interest with a competitor, customer or supplier of Highland Rivers CSB without first reviewing the nature of the activity with the Executive Director.

Highland Rivers CSB's policy is that no employee should give anything of value to federal or state government officials.

### ***Financial Practices, Billing and Record Keeping***

Highland Rivers CSB employees must be truthful and accurate in all records, reporting and billing activities.

### ***Confidential Information***

Highland Rivers CSB employees are expected to maintain the confidentiality of information obtained in the course of employment with Highland Rivers. Confidential information should not be shared with anyone inside or outside of Highland Rivers CSB, except as necessary to perform work for Highland Rivers CSB or as required by law. Employees will take all requests for information to their supervisor/manager for an appropriate response. This includes information contained in computer systems and consumer records. Each employee is responsible for safeguarding confidential information, including storing confidential information in a secured location. Highland Rivers CSB is required by law to protect the confidentiality of consumer information. Only individuals authorized by federal and/or state law may have access to consumer medical records and other consumer information.

Highland Rivers CSB proprietary information is a valuable asset intended for the exclusive use and benefit of Highland Rivers CSB. Employees should treat as proprietary and confidential all information concerning Highland Rivers CSB finances, operations, products, policies, consumers, development plans, computer programs and related information. Employees may not release such information to anyone outside Highland Rivers such as competitors, suppliers or outside contractors, except as required by law.

### ***Record and Document Retention***

Highland Rivers CSB will institute a comprehensive record/document management policy as part of the Compliance Program.

### ***Compliance***

Highland Rivers CSB is committed to complying with all Federal and State laws and regulations, with an emphasis on preventing fraud and abuse. Highland Rivers CSB will maintain processes to detect Medicaid/Medicare or other third party payer compliance offenses, to initiate corrective action to prevent similar offenses, to report to Government authorities when appropriate and to address the ramifications of failure to comply with standards, policies and procedures.

### ***Human Resource Policies***

Highland Rivers CSB is an equal opportunity/affirmative action employer. The organization's policies, procedures and personnel programs are administered without regard to race, color, religion, sex, age, sexual orientation, national origin, disability or veteran status. This applies to recruitment, placement, promotion, transfer, retention and training, as well as to all other privileges, personnel programs, organizational policies, procedures and terms and

conditions of employment. Each employee shares responsibility for preventing discrimination and harassment. Highland Rivers CSB encourages employees who believe they have been discriminated against or harassed, or have knowledge of discrimination or harassment, to discuss the concerns with their supervisor or the human resource director. No retaliatory action will be taken against employees for reporting discrimination or harassment.

### ***Government Requests for Information***

Highland Rivers CSB policy is to comply with every reasonable and lawful request by federal, state and local government officials for information and documents concerning the organization's operations. Information provided to government agencies must be truthful and accurate. Highland Rivers will not tolerate false statements made by employees to government agencies/officials and will take appropriate action against employees violating this policy. Government requests might include information related to consumer care, billing and financial practices and related operational or financial issues.

Employees are expected to comply with Highland Rivers CSB Subpoena Policy when records are requested. Highland Rivers CSB is entitled to the safeguards provided by law against disclosure of certain information to the government. Examples of information that might not be subject to disclosure include, but are not limited to: certain consumer information that might be protected by medical record privacy laws; certain quality assurance information compiled to comply with federal and state requirements; and certain information collected as part of the organization's peer review process to review and evaluate the credentials of healthcare providers furnishing services in Highland Rivers CSB facilities.

### ***Corporate Resources***

Highland Rivers CSB assets made available to employees are to be used only for authorized business purposes. Each employee should use corporate resources economically and safeguard corporate assets at all times. Employees entrusted with the direct handling of organizational funds will be held accountable for the integrity and accuracy of those monies and records.

### ***Responsible Use of Computers and Computer Software***

Highland Rivers CSB employees should use computers, computer software and electronic mail for business purposes only. Highland Rivers CSB may access this information in the ordinary course of business, as permitted by applicable law.

Employees should exercise discretion with particular attention to the confidentiality agreement when electronic mail is used to communicate about confidential, proprietary or sensitive legal or financial matters since this material could be accessed at a future time by third parties, even if the electronic mail has been deleted.

Highland Rivers CSB policy is that employees use computer software only as permitted by license agreements. Computer software should not be used or duplicated without a license or proper authorization from the software developer.

### ***Political Activities***

Highland Rivers CSB must ensure that employees' political activities and contributions are conducted as private individuals and do not appear to represent the opinion of the organization.

### ***Employee Relations***

Each employee should perform assigned tasks in a responsible, reliable and cooperative manner and treat each other with mutual respect, dignity and trust.

### ***Controlled Substances***

The illegal use or possession of any controlled substance is unacceptable and will not be tolerated because it is illegal and it jeopardizes employee and consumer safety and reduces productivity, reliability and trustworthiness.

### ***Reporting Misconduct***

Each employee is responsible for bringing to the attention of their immediate supervisor or manager any situation that appears to violate this code of conduct, applicable law and policies. Supervisors and/or managers will suggest appropriate action or contact the Compliance Officer. If it is inappropriate to discuss the issue directly with an immediate supervisor, the employee may raise the issue directly with the Compliance Officer. If necessary, the issue may be brought to the attention of any member of the Compliance Committee, or, in an exceptional situation, the Chief Executive Officer.

Reporting violations will remain as confidential as possible. Employees may, however, be required to substantiate any allegations of wrongdoing. No employee will be punished or subject to reprisal because he or she, in good faith, reports a violation or suspected violation of this Code of Conduct.

# Getting Answers to Ethics and Compliance

Open discussions of ethical and legal issues without fear of retribution is the cornerstone of Highland Rivers CSB's Compliance Program. Highland Rivers CSB will not tolerate retaliation against any employee who, in good faith, reports an ethical or legal concern. If an employee has a question about a legal or ethical issue related to their job or work area or to Highland Rivers CSB's operations, they should take advantage of the following resources:

***Corporate Compliance Office***                      ***1-706-270-5000***

***Corporate Finance Office***                      ***1-706-270-5002***

***Corporate Human Resource Office***        ***1-706-270-5002***

***Corporate Compliance Hotline***            ***1-800-690-7430***

***Remember, if there is a question or concern about legal or ethical issues that arise in the everyday performance of job duties:***

- Discuss them with a supervisor or manager
- Discuss them with a department director
- Discuss them with a Compliance Committee Representative
- Discuss them with the Compliance Officer
- Discuss them with the Human Resource Director
- Discuss them with the Finance Director
- Call the Corporate Compliance Hotline
- Use any combination of the resources above.

# Notes

# Code of Conduct Certification of Compliance

I have read the entire Code of Conduct. I have had the opportunity to ask any questions I might have with regard to its contents and believe I understand fully how the policies relate to my position.

I hereby acknowledge my obligation and agreement to fulfill those duties and responsibilities as set forth in the Code of Conduct and to be bound by these standards.

I further certify that, throughout the remainder of my association with Highland Rivers CSB, I shall continue to comply with the terms of the Code of Conduct.

I understand that violations of the Code of Conduct may lead to disciplinary action, including discharge.

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Signature

---

Month / Day / Year

---

Name (please print)

---

Title/Position

# Code of Conduct Certification of Compliance

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Signature

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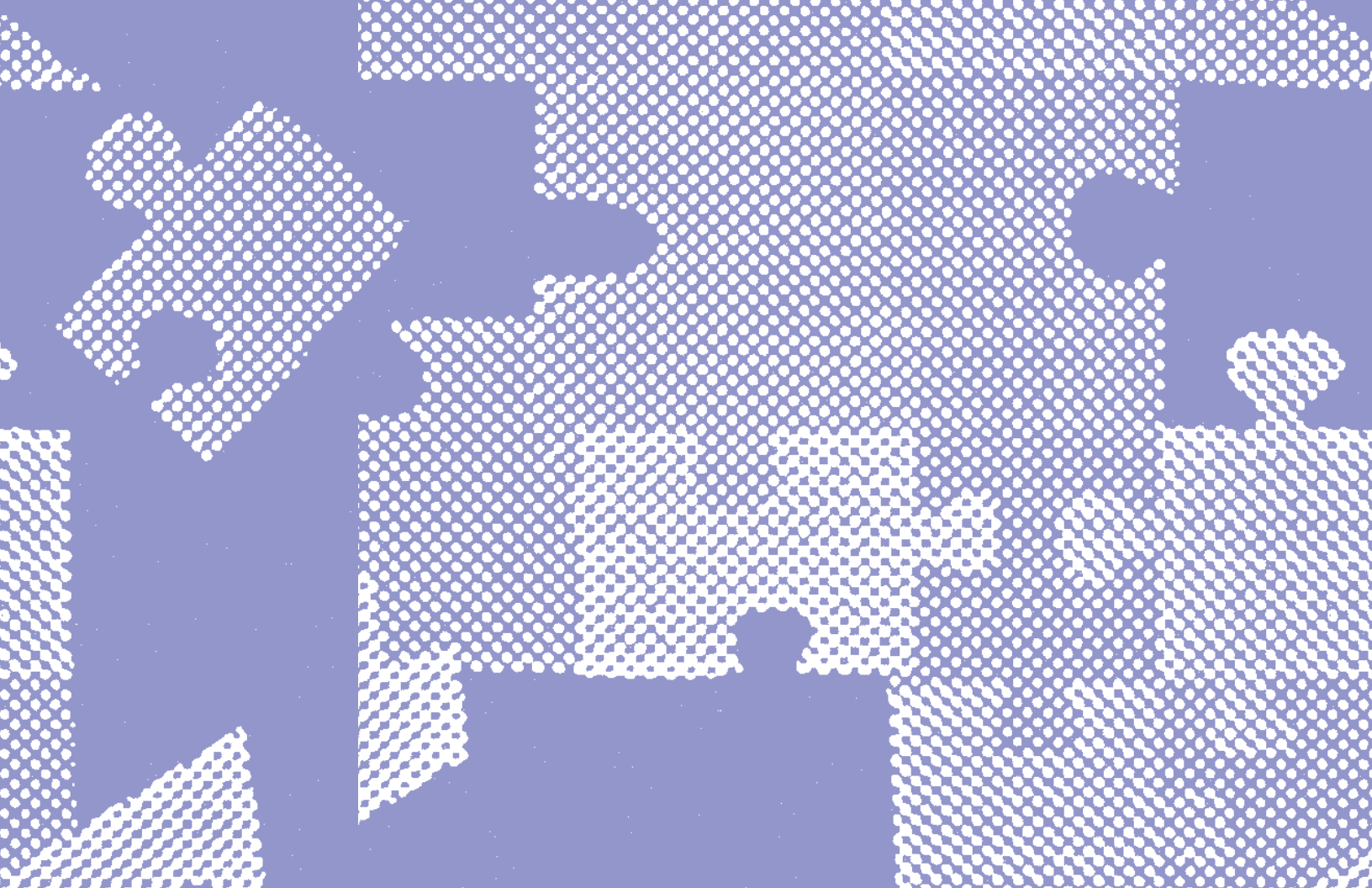
Month / Day / Year

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Name (please print)

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Title/Position





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