

NorthCare Network Code of Compliance Ethics

NorthCare's Code of Compliance Ethics focuses on expectations of your organization, and employees, in terms of regulatory compliance and ethics. It is expected that your organization will have a more detailed Code of Conduct/Ethics that addresses a broader scope, such as, conflict of interest, privacy and confidentiality, etc. and that this NorthCare Code of Compliance Ethics will supplement such. This Code of Compliance Ethics is your organizational commitment to adhere to NorthCare's Compliance Program.

On behalf of _____, I understand it is the responsibility of this organization as a provider for NorthCare to:

- Ensure all employees, agents, volunteers and sub-contractors are educated and understand their commitment to regulatory compliance;
- Comply with all statutes, regulations, and guidelines applicable to federal and state health care programs.
- Report conduct that a reasonable person would, in good faith, believe to be erroneous or fraudulent.
- Report suspected violations, fraud, abuse, or waste.
- Adhere to all legal, regulatory, fiscal and program requirements.
- Read and understand, and implement NorthCare's Regulatory Compliance Program Policy and Compliance Program Plan requirements, which include procedures for reporting a suspected or known compliance issue.
- Prohibit false, fraudulent or otherwise inaccurate claims.
- Approve only those services authorized and necessary, accurately documenting and billing for authorized services rendered. Under no circumstance shall any covered party knowingly: make false or inaccurate claims; bill for services not rendered; provide and/or bill for medically unnecessary services; inappropriately code billing; or submit duplicate billings.
- Accurately prepare and maintain all consumer and organizational data, records, and reports according to applicable contracts, federal and state laws, and NorthCare policies and procedures.
- Voluntarily disclose to NorthCare and correct any known errors in claims or encounter reporting. NorthCare also promotes voluntary disclosure or reporting of violations of civil, criminal, or administrative law to appropriate third-party law enforcement or regulatory agencies. Self-Disclosure must follow the Office of Inspector General's Provider Self-Disclosure Protocol (42 USC 1320a-7b(f)) and the requirements of the Federal False Claims Act, (31 USC 3729-3733)

I further understand that:

- Our organization has the responsibility to detect and report suspected violations, where a reasonable person/entity could be expected to detect violation;
- Failure to report erroneous or fraudulent conduct is a violation of the compliance program and will be addressed in accordance with the NorthCare Sanction policy;
- Violations of these standards of conduct will also be addressed in accordance with the NorthCare Sanction policy;
- It is our organizational responsibility to educate employees on our local compliance efforts along with NorthCare's Compliance Program and reporting requirements, the Deficit Reduction Act, Federal and State False Claims Act and the Whistleblowers' Protection Act, the impact of the laws on preventing fraud and abuse, and to make beneficiaries aware of their role in combating fraud and abuse;
- It is our organizations responsibility to make employees and sub-contractors feel comfortable reporting issues;
- There will be no retribution for reporting conduct that a reasonable person/entity acting in good faith would have believed to be erroneous or fraudulent;
- Reports may be made anonymously;
- NorthCare's Compliance Office may be contacted at any time to provide technical assistance or assist with a "hypothetical review" of a situation that may not be false or fraudulent by first appearance;
- Individuals are protected under the Whistleblowers' Protection Act 469 of 1980, which is an Act to provide protection to employees who report a violation or suspected violation of state, local, or federal law; to provide protection to employees who participate in hearing, investigations, legislative inquiries, or court actions; and to prescribe remedies and penalties.

In addition to my full understanding of the above Ethics statements, I attest that as of this date, I am not aware of any reportable incident, or I have reported any incidence of non-compliance of which I am aware. Should I become aware that a situation is potentially a violation of the False Claims Act, or an otherwise reportable occurrence, I will report immediately, in accordance with NorthCare's Regulatory Compliance Program.

Chief Executive Officer Name: _____

Signature: _____ Date: _____

Compliance Officer Name: _____

Signature: _____ Date: _____