

# THE CENTER FOR DISCOVERY

SUBJECT: Code of Conduct Development and Dissemination	MANUAL: Corporate Compliance
	SECTION: Section 1

## Policy:

The Center for Discovery will maintain and periodically update written document(s) to provide guidance to all affected individuals, to include employees, contractors, vendors, board members, and others working on behalf of The Center related to ethics, compliance, and to address specific issues related to quality of care, reimbursement, financial relationships, and other critical areas, with a particular emphasis on preventing fraud and abuse. These documents reflect the Center for Discovery's Code of Conduct.

The Code of Conduct addresses important parts of the compliance program, including but not limited to, employee and management responsibilities, the problem-resolution process, corporate compliance hotline, and non-intimidation and non-retaliation policy. It also addresses specific issues related to quality of care, reimbursement, financial relationships, and other critical areas.

The Code of Conduct applies to all members of the Center for Discovery community including employees, contractors, vendors, interns, and volunteers. The Compliance Plan and Code of Conduct are presented within trainings upon hire and at least annually thereafter. An overview of the compliance plan and employee expectations related to following all aspects of the code of conduct are included within the Employee handbook which is provided to new employees. Additionally, the entire Corporate Compliance Plan which includes the Code of Conduct and the Code of Business Conduct is available to employees and other members of the Center for Discovery community as well as those outside of the community by website.

**Purpose:** The term "code of conduct" refers to the written guidance on standards of conduct and expected behavior of employees and others in the workplace; it may encompass one or more documents with varying names, but all reflecting codes of ethics and behaviors to which all those acting on behalf of The Center must adhere. The Center for Discovery is committed to conducting business ethically and in conformance with all applicable laws and regulations. The purpose of this policy is to provide guidance on the development and dissemination of the Center for Discovery's Code of Conduct.

## Procedure:

1. The Corporate Compliance Officer will have primary responsibility for developing and periodically updating policies and documents which address the CFD Code of Conduct. Revisions and updates to the Code of Conduct specifically related to the corporate compliance program will be presented to the Governance and Corporate Compliance Committee of the CFD Board of Directors for approval. The committee may also recommend revisions as necessary.
2. The Center for Discovery Board of Directors will be responsible for oversight and final approval of any documents pertaining to the CC Code of Conduct.

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3. The Code of Conduct will address the following critical areas related to compliance:
  - a. Those covered by the Code of Conduct
  - b. The Center for Discovery's mission and values
  - c. Quality of care/service
  - d. Ethical business practices
  - e. Compliance with laws and regulations
  - f. Billing, coding, claims processing, documentation and maintenance of records.
  - g. Protection and use of information, property and assets
  - h. Conflicts of Interest
  - i. Gifts and gratuities
  - j. Obligation to follow laws and report suspected, potential or known violations
  - k. Non discrimination
  - l. Methods available to employees for reporting, including the hotline
  - m. Corrective actions/discipline for violations
  - n. Responsibilities of supervisors and administration
  - o. Non Intimidation and Non-retaliation policy
  
4. All employees will receive training on the Code of Conduct within their Corporate Compliance Training to help them understand how it applies to everyday work situations. The Training Department will ensure that documentation is maintained as evidence that those employees have received training. The Code of Conduct is also available on the employee network site (Discovernet) along with the Corporate compliance Handbook which contains all policies and procedures of the Corporate Compliance Plan
  
5. The Code of Business Conduct is made available as part of the Corporate Compliance plan, policies and procedures which make up the Corporate Compliance Handbook via website (<http://www.thecenterfordiscovery.org/quality-improvement-and-compliance/#CompliancePolicy>) to the public, including all Board members, administration, employees, and those with whom business is conducted.

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