



## **Code of Conduct**

Effective January 1, 2016

### **Regulatory Compliance** – *It's not just the law; It's the way we care for our clients.*

The Mental Health Center of Boulder County, Inc., d/b/a Mental Health Partners (“MHP”) operates in a heavily regulated sector, as a result of the funding we receive, the state and federal laws that govern what we do, and the vulnerable clients we serve. MHP takes very seriously its regulatory and legal obligations, along with the Code of Conduct, Compliance Plan, policies, and procedures. To continue to serve our clients, we must operate within these regulations, even when that requires balancing demands on our time and resources. At MHP each of us will follow the rules and requirements and strive for excellence in client care.

### **Working with Regulatory Bodies** – *We Cooperate with Visits, Reviews and Inquiries*

Regulations affect the way we deliver care in order to protect clients and prevent fraud, abuse, and waste. They govern which individuals can properly care for patients and how and where they can deliver care. MHP will respond promptly, accurately and fully to any agency contact. When agency personnel contact you, whether in person, by phone, letter or e-mail, you should immediately contact your supervisor and the Compliance Officer, and allow them to assist in responding to the request.

### **Documentation and Records** – *We keep our information accurate, complete and confidential*

Whether our records are client healthcare records, billing and accounting information, or other materials, they should be accurate, complete, and consistent with the standards set by MHP. Regulations also govern how we record client healthcare interactions, how we bill and collect payment for our services, and our relations with each other and with MHP. Errors or lack of attention to details in documentation can have serious impact on our clients, our revenue, and on MHP and runs counter to our culture of compliance. Because we work with the sensitive healthcare information of our clients, we will keep all information confidential within

professional standards and we will observe the federal and state laws governing protected health information. Each category and classification of information will be maintained and preserved consistent with the MHP standard.

**Caring for Patients First and Without Influence – *MHP resources only for MHP and our clients***

Because our mission is to care for clients, MHP wants its resources - money, supplies, equipment and personnel time – to be used for its clients. The resources of MHP should be used to further our mission. In addition, care decisions and resource choices should be made in the best interest of the client and MHP. Any decision about client care, purchases, research, personnel or other MHP related matters must be free of all conflict of interest. Our relationships outside of MHP should not put us in conflict with our client’s best interest. This includes pre- and post-employment which are covered by conflict of interest.

**Business Courtesies and Marketing Practices – *Only Proper Payments, Gifts & Contributions***

We will not give clients money or gifts that might influence their healthcare choices. MHP, and its staff of providers, caregivers and others affiliated with us, will not give or accept payment, gifts, or contributions that might influence client care or the decisions made on behalf of MHP. All collaborations will be consistent with the regulatory guidance for those collaborations and sharing of information. Violations could reflect inaccurately upon MHP or indicate that MHP has acted improperly. All relationships with Mental Health Partners staff, vendors and outside parties will be documented fully and accurately to demonstrate their lawful purpose and intent.

**Speak Up – *You are the key to MHP’s success***

Each of us must follow this Code of Conduct. If you see some way that MHP or someone within MHP is not following this Code of Conduct, you must let your supervisor know immediately so that we can improve MHP. Supervisors or management are expected to forward compliance-related concerns to the Compliance Officer. If you are not comfortable raising concerns within your department, or if issues have not been addressed after you have raised them, call your Compliance Officer. Your communication will be confidential. MHP will not retaliate against any person that makes a report, and if you prefer to make your report anonymously, you can call the Compliance Hotline at **855-696-4385**. But whatever the method, help us to follow our Code of Conduct and provide excellence in patient care.