

Compliance Standards of Conduct

These standards of conduct apply to the governing body, employees, interns, and volunteers of Northern Rivers Family of Services. It also applies to contractors, agents, subcontractors, and independent contractors within the scope of their contracted authority.

We maintain a culture of compliance. We promote a culture of compliance that supports the Northern Rivers Compliance Program. We do so by acting with honesty and integrity. We reach this goal by preventing, detecting, reporting, and correcting business practices that may result in adverse consequences and risks to our organizational mission. We demonstrate our commitment to a culture of compliance by cooperating with investigations, audits, and reporting processes.

We operate in good faith. As part of our culture of compliance, we will not retaliate against or intimidate anyone, including Medicaid recipients, who reports suspected fraud, abuse, or other improper activity in good faith.

We continue our education. We complete Northern Rivers' compliance training and apply those basic compliance principles to our business practices. The topics covered include the Compliance Standards of Conduct, the U.S. Federal False Claims Act, proper documentation of services and billing, to proper accounting of organizational funds, and the key elements of the Compliance Program. In addition, we attend annual refresher compliance training sessions. We are also responsible for participating in program-specific training needed to perform our jobs.

We use Northern Rivers' resources exclusively for Northern Rivers business. We use Northern Rivers' resources solely for the purpose of carrying out responsibilities of our job. We do not use our affiliation with Northern Rivers, its facilities, equipment, and other assets for personal benefit or to engage in any outside business or volunteer activity, or to promote any business, charitable, or political cause. We seek reimbursement from Northern Rivers for expenses only to the extent that such expenses have been incurred in the course of carrying out our duties and in accordance with Northern Rivers' expense reimbursement policies. All Northern Rivers' assets are used solely for the benefit and purpose of the organizational mission.

We comply with proper billing and documentation standards. It is our responsibility to ensure that all case record and billing data are true and accurate. We are trained on the rules and regulations for billing and documentation as related to the services we provide. We provide and document services in the manner required by laws, regulations, policies, and applicable standards of care. When we are unsure of the billing and documentation standards required to perform our functions appropriately, we ask for training and assistance. All supporting documentation, not just the claim itself, falls under this compliance standard for billing. When possible, we discover and make corrections prior to submitting claims. When necessary, we make billing corrections and return funds to the proper sources.

We respect privacy and confidentiality. We protect client information at all times regardless of the form it takes (paper, electronic, or verbal). We do so by being knowledgeable about the basic requirements of HIPAA and other confidentiality standards that apply in our workplace. We refrain from disclosing confidential and protected health information (PHI) inappropriately. We only access and disclose the minimum amount of information needed to provide required services.

We uphold professionalism. We conduct ourselves in a manner that supports high ethical standards. If we are in a position that requires a license, we ensure we are in compliance with all licensure requirements, including timely licensure registration/renewal, insurance enrollment, and fulfillment of continuing education requirements. Our ethical standards maintain that we place the integrity of our profession and the interests of our clients above our own. We act appropriately and only within our professional capacity and scope of practice.

We politely explain we are unable to accept gifts of more than a nominal value. We cannot accept gifts or gratuities from our clients, vendors, or contractors of greater than nominal value. We do not give gifts to clients and their families. We support this compliance principle to ensure we maintain appropriate boundaries and keep our clients' best interests as our sole concern. We do not allow our decision-making to be influenced or our decisions impacted by outside compensation, unfair advantage, reward, or special attention.

We disclose conflicts of interest. We conduct ourselves in a manner that avoids conflicts of interest and supports the best interests of Northern Rivers and our mission. In our professional capacity, we are not influenced by personal interest or relationships. We continually disclose all direct or indirect, personal, or outside investments, relationships, transactions, or interests that are or may be a conflict of interest with our employment at Northern Rivers.

We report business practices that we know, or think may be, improper. If we identify any improper activity in our workplace or think there may be improper activity, we report our concerns in many ways: to our supervisor, program director, the Compliance Officer, the Chief of Compliance and Quality Improvement, or a member of the Northern Rivers Board of Directors. If we are concerned about the confidentiality of our report, we can access the agency's anonymous compliance hotline at:

Phone English, 800.401.7404
Spanish, 800.216.1288

Email reports@lighthouse-services.com

Fax 215.689.3885
include company name with report

Web www.lighthouse-services.com/northernrivers

Scan



If you have any questions, contact the Northern Rivers Compliance Officer at 518.426.2600.