

Gateway-Longview, Inc. Code of Conduct

Based upon the Corporate Compliance Plan of Gateway-Longview, Inc. the Agency demonstrates its commitment to the display of honest, ethical behavior in all interactions while carrying out the mission of the Organization according to the following Code of Conduct.

A. Everyone

All directors, employees, independent contractors, vendors, business contractors, volunteers, and interns will display honest, ethical conduct according to applicable oversight organizations and in compliance with Federal, State and local regulations and laws, including, but not limited to the following:

1. New York State Non-Profit Revitalization Act
2. Protection of People with Special Needs Act
3. Health Insurance Portability and Accountability Act (HIPAA)
4. Health Information Technology for Economic and Clinical Health (HITECH)
5. Family Educational Rights and Privacy Act (FERPA)
6. Sarbanes-Oxley Act of 2002 (“Whistleblower”)
7. Anti-Kickback and Stark laws
8. Payment Card Industry Standards
9. Social Service Law (Section 363-d, NYCRR Part 521)

Gateway-Longview’s Code of Conduct applies to activities related to the following:

1. Billing
2. Payment
3. Medical necessity and quality of care
4. Governance
5. Mandatory reporting,
6. Credentialing
7. Other risk areas that are, or should, with due diligence be identified

B. Duty to Report

All directors, employees, independent contractors, vendors, business contractors, volunteers, and interns must report any known or possible violation according to Gateway-Longview’s Code of Conduct, through their normal supervisory channels, to the Corporate Compliance Officer, to the Audit and Compliance Board of Directors, or to the Agency Whistleblower hotline. Any conduct that a reasonable person would in good faith believe to be erroneous or fraudulent must be reported.

Examples of potential reportable compliance concerns may include:

Documentation believed to be made in error or through fraud, including, but not limited to: Progress notes (electronic or paper), client attendance, transportation, incident reports; Expense reimbursement requests, time sheets, invoices, check requests; Billing, payment or approval for payment without supporting records.

Behavior contrary to applicable Agency Policy and regulations including, but not limited to: Sharing private information, through any method, without proper authorization; interfering with a client or employee procedure to file a grievance or discuss a complaint; disregard for client safety.

C. **Non-Intimidation and Non-Retaliation**

According to Gateway-Longview's Non-Intimidation and Non-Retaliation Policy, Gateway-Longview does not tolerate any action taken against any individual who, in good faith, participates in its compliance program and activities including reporting potential issues, investigating issues, self-evaluations, audits and remedial actions, and for reporting concerns to public officials.

D. **Failure to Report**

Those who fail to report any known or possible violation according to Gateway-Longview's Code of Conduct, participate in non-compliant behavior, and/or encourage, direct, facilitate or permit non-compliant behavior will be subject to corrective action in accordance with Gateway-Longview's Personnel Manual and/or held to the applicable regulation, procedure and/or contract.

E. **Investigation**

Allegations of non-compliance will be investigated swiftly, thoroughly and fairly, by the Corporate Compliance Officer according to the Corporate Compliance Investigation and Resolution of Compliance Concerns Policy.

1. All directors, employees, independent contractors, vendors, business contractors, volunteers, and interns are expected to cooperate fully in an investigation of non-compliance.
2. Confidentiality will be maintained to the degree possible.
3. If misconduct is detected, corrective action will be taken in accordance with the Agency Personnel Manual and/or according to the applicable regulation and/or contract.

F. **Reporting Methods**

Reports of suspected or actual improper conduct must be reported to the Corporate Compliance Officer through normal supervisory channels or as follows:

*Corporate Compliance Officer, Pamela Rouse (783-3224; prouse@gateway-longview.org)

*Board of Directors Audit and Compliance Committee Chair, Tracy Meyer; 716-400-4529.

*The Whistleblower Hotline

oBy Phone: 877-472-2110

oE-mail: reports@lighthouse-services.com

oFax (215) 689-3885

oBy letter to: Lighthouse Services, Inc. 1710 Walton Road, Suite 204, Blue Bell, PA 19422 (You must include Gateway's name in letter)