


<p>HORIZON HOUSE, INC. POLICIES AND PROCEDURES</p>		
<p>CODE OF ETHICAL CONDUCT</p>	Policy Number:	1.4.1
	Effective Date:	10/4/2024
<p>Approval: _____ Jeff Wilush, President & CEO Date</p>		

PURPOSE

Our Code of Ethical Conduct, referred to as the “Code” throughout this document, provides guidance to all Horizon House staff. It assists us in carrying out our daily activities within appropriate ethical and legal standards. These obligations apply to our relationships with participants, affiliated physicians, third-party payers, subcontractors, independent contractors, vendors, consultants, and one another.

The Code is a critical component of our overall Compliance Program to ensure we meet our ethical standards and comply with applicable laws and regulations.

I. AREAS AFFECTED

The standards in the Code apply to all Horizon House facilities and employees. The standards are mandatory and must be followed.

II. POLICY

The Code of Ethical Conduct is intended to serve as a guide for employee conduct. It is used as a basis for the resolution of issues when conduct of an individual deviate from the standards expressed in this Code. The Code does not intend to replace any existing policies and procedures that Horizon House has in place but rather to elevate their importance and ensure a consistent focus and understanding.

Our aim is to promote an atmosphere in which ethical behavior is thought about and practiced. Each employee is personally responsible to act in accordance with the Code and the policies of Horizon House.

CODE OF ETHICAL CONDUCT OUTLINE:

- A. Obey the law.**
- B. Value our participants.**
- C. Value our employees.**
- D. Respect all our stakeholders.**
- E. Violations of the Code of Ethical Conduct**

IV. DEFINITIONS Not applicable.

V. RESPONSIBILITIES

While all Horizon House staff are obligated to follow our Code, we expect our leaders to set the example -- to be, in every respect, a model. We expect each supervisor to create an environment where all team members are encouraged to raise concerns and propose ideas.

We also expect that supervisors will ensure that those on their team have sufficient information to comply with laws, regulations and policies, as well as the resources to resolve ethical dilemmas. Our aim is to promote an atmosphere in which ethical behavior is thought about and practiced. Each employee is personally responsible to act in accordance with the Code of Ethical Conduct and policies of Horizon House.

VI. PROCEDURES

A. OBEY THE LAW:

1. Adhere to both the spirit and letter of applicable federal, state, and local laws, regulations, and contracts.

Horizon House will operate in accordance with all applicable federal and state statutes, regulations, contracts, guidelines, and professional standards. This includes its commitment to prepare and submit accurate billing and/or cost reports consistent with program regulations.

Anyone aware of violations or suspected violations of laws, regulations, program standards and the conditions of participation, or agency policies and procedures must report them, immediately, to a supervisor or member of management, your Human Resources Manager, or to the Director of Organizational Quality and Compliance who is the designated agency Compliance Officer.

2. Healthcare Fraud, Waste & Abuse

It is Horizon House's policy to comply with all laws and regulations pertaining to the delivery of and billing for clinical services. These rules apply to Horizon House due to its participation in Medicare, Medicaid, and commercial insurance programs. Horizon House will also comply with all laws and regulations regarding the management of participant funds and property. Misuse of funds or property of any participant receiving services will not be permitted. Additionally, as a committed healthcare provider, Horizon House will adhere to minimizing waste by ensuring that services and resources are utilized efficiently and effectively to enhance the quality of care we deliver.

a. Coding and Billing for Services

When claiming payment for services, we have an obligation to our participants, third party payers, and the state and federal government to exercise diligence, care, and integrity. Horizon House is committed to maintaining the accuracy of every claim. Employees are expected to monitor compliance with applicable billing rules and established coding guidelines. Any false, inaccurate, or questionable claims should be reported immediately to a supervisor or to the Director of Organizational Quality and Compliance.

1.4.1 CODE OF ETHICAL CONDUCT

It is against the law to knowingly submit false claims for payment. Submitting a false claim may include using the wrong billing codes, falsifying the participant's record, or billing for services that are not provided or are not necessary. Violations of these laws are punishable by fines, prison, or both.

b. The Federal False Claims Act

The False Claims Act exists to fight fraud, including false claims against the federal government. A false claim is a claim which is intentionally false or fraudulent and may take many forms, including, for example, overcharging for a product or service, delivering less than the promised amount or type of goods or services, underpaying money owed to the government, and charging for one thing while providing another.

This Federal Law covers fraud involving any federally funded contract or program with the exception of tax fraud. Under the False Claims Act, anyone who knowingly submits or causes the submission of false claims to the government is liable for damages of up to three times the erroneous payment plus civil penalties of \$5,500 to \$11,000 per false claim.

Within this law, an individual, called the whistleblower, who comes forward with information regarding a false claim, is also permitted to file a case in federal court. The Department of Justice then decides on behalf of the government whether to join the whistleblower in prosecuting these cases. If the case is successful, the whistleblower may share in the recovery. The amount that may be shared depends on multiple factors.

Horizon House will not retaliate against any employee who chooses to file a False Claims Act case. The FCA provides a remedy for whistleblowers who are discharged, demoted, suspended, "or discriminated against in the terms and conditions of employment by his or her employer."

c. Pennsylvania's and Delaware's Medicaid Provider and Whistleblower Acts

Pennsylvania's and Delaware's Medicaid laws also impose civil and criminal penalties upon Medicaid enrolled providers who submit false claims and statements. Prohibited activities in these acts include referring an individual for goods or services covered by Medicaid in return for any kind of remuneration, billing for services not rendered, misrepresenting the service/supplies rendered, altering claims, or duplicate billing for the same services.

Pennsylvania and Delaware also have whistleblower provisions, which protect employees of public bodies who, in good faith, report fraud and abuse about their employers or cooperate in an investigation, hearing, or inquiry by an appropriate authority. Employees of public bodies as defined under this law may not be discharged or discriminated against as a result of their reporting actions or cooperation with appropriate authorities. Horizon House complies with these laws.

3. Nonprofit Status and Tax Law

1.4.1 CODE OF ETHICAL CONDUCT

Horizon House is tax-exempt because of our charitable mission. Violation of the tax rules can result in loss of our tax exemption or can cause the IRS to penalize the person receiving an excess benefit and the personnel who approve the payment.

A tax-exempt entity may not permit insiders (directors or officers who can influence organization decisions) to benefit personally from dealing with the organization. Nor may any person (inside or out) receive a benefit from the organization beyond what is necessary to allow the organization to fulfill its mission (e.g. employees may be paid a fair salary). Those we do business with should not receive more than fair market value for the goods or services they provide.

4. Advertising and Marketing

All advertising and marketing of services and products will be conducted fairly, honestly, and in a non-deceptive manner, stressing their value and merits. Horizon House will not misrepresent its services. Horizon House will not undermine the services of a competitor. Horizon House staff will not use disparaging comments or innuendoes in a business dealing.

5. Copyrights

Horizon House staff may only copy and/or use copyrighted materials according to copyright laws. Any questions about what may be copied are to be directed to supervisory personnel or the Compliance Officer.

6. Diversity and Equal Employment Opportunity

Horizon House actively promotes diversity in its workforce at all levels of the Agency. We are committed to providing an inclusive work environment where everyone is treated with fairness, dignity, and respect. We will make ourselves accountable to one another for the manner in which we treat one another and for the manner in which people around us are treated. We are committed to recruit and retain a diverse staff reflective of the participants and communities we serve. We regard laws, regulations, and policies relating to diversity as a minimum standard. We strive to create and maintain a setting in which we celebrate cultural and other differences and consider them strengths of the Agency.

It is against the law to discriminate against an employee, student, or participant on the basis of race, color, sexual orientation or gender, age, national origin, disability, or other protected status. Every employee has a responsibility to prevent, eliminate, and report discrimination at Horizon House. We understand and appreciate the value that diversity contributes to our organization. Mutual respect is a core value of Horizon House.

7. Referrals and Kickbacks

All employees should exercise caution when entering into transactions that involve referral sources. If employees are concerned that such an arrangement may be improper, they should discuss the situation with their immediate supervisor, the Compliance Officer, or call the Compliance **Hotline**.

Horizon House expects that:

- Employees will not offer to pay, or pay a financial benefit of any kind in exchange for referring or recommending the referral of any individual to Horizon House or to an outside provider.

1.4.1 CODE OF ETHICAL CONDUCT

- Physicians will not make referrals for health care services to entities in which the physician has a financial interest (either through ownership or a compensation arrangement,) unless the financial arrangement complies with applicable laws; and
- Horizon House will not bill for services rendered as a result of an improper referral.

8. Business and Financial Information

a. Accuracy, Retention, and Disposal of Documents and Records

Each Horizon House staff is responsible for the integrity and accuracy of our Agency's documents and records, including the health care records of our participants. No one may alter or falsify information on any record or document. Records must never be destroyed in an effort to deny governmental authorities access to information that may be relevant to a government investigation.

Health and business documents and records are retained in accordance with the law according to schedules maintained by specified departments. Health and business documents include paper documents, such as letters and memos, computer based information, such as e-mail or computer files on a disk or tape, and any other medium that contains information about the Agency or its business activities. It is important to retain and destroy records only according to our policy. Horizon House staff must not tamper with records. No one may remove or destroy records prior to the specified date without first obtaining permission as outlined in Horizon House's Health Records Retention policy. Finally, under no circumstance may a Horizon House staff use participant, staff, or any other individual or entity's information to personally benefit them.

b. Confidentiality and Security

The use of confidential information obtained in the course of employment with Horizon House is to be limited to conducting Horizon House's business. Neither a member of the Board of Directors, nor any employee may use or permit others to use confidential information for the purpose of furthering a private interest or as a means of making a profit.

Federal and state statutes and regulations protect participant information. Records of the service relationship, including interview notes, test data, correspondence, computer-stored information, progress notes, and other documents are to be considered part of the records of Horizon House. Disclosure of the consumer's protected health information and other pertinent information may occur only with the express written consent of the participant and only after the appropriate Horizon House authorization forms have been fully completed and signed. All requests for consumer records are subject to review by the Health Records Department.

Horizon House staff must never use or disclose confidential information that violates the privacy rights of our participants. In accordance with our privacy and security policies and procedures, which reflect HIPPA requirements, no Horizon House staff, affiliated physician, or other health

1.4.1 CODE OF ETHICAL CONDUCT

care partner has a right to any participant information other than that necessary to perform his or her job.

Subject only to emergency exceptions, participants can expect that their privacy will be protected, and participant specific information will be released only to persons authorized by law or by the participant's written authorization.

Staff must protect health information in accordance with information security policies and standards when it is e-mailed outside Horizon House or otherwise sent through the Internet; stored on portable devices, such as laptops and portable digital assistants (PDAs); or transferred to removable media such as a CD or USB drive. The use of USB/flash drives to store participant protected health information is strictly prohibited.

If an individual's employment or contractual relationship with Horizon House ends for any reason, the individual is still bound to maintain the confidentiality of information viewed, received, or used during his/her relationship with Horizon House. Copies of confidential information in an employee or contractor's possession will be left with Horizon House at the end of the employment or contractual relationship.

c. Electronic Media and Security Requirements

All communications systems, including but not limited to computers, electronic mail, Intranet, Internet access, telephones, and voice mail are the property of Horizon House and are to be used primarily for business purposes. Limited reasonable personal use of Horizon House communications systems is permitted; however, users should assume these communications are not private. Users of computer and telephonic systems should presume no expectation of privacy in anything they create, store, send, or receive on the computer and telephonic system. Horizon House reserves the right to monitor and/or access communications usage and content.

Staff may not use internal communication channels or access to the Internet at work to view, post, store, transmit, download, or distribute any threatening materials, maliciously false materials, obscene materials, or anything illegal. Also, these channels of communication may not be used to send chain letters, personal broadcast messages, or copyrighted documents that are not authorized for reproduction.

Staff who abuse our communications systems or use them excessively for non-business purposes may lose these privileges and be subject to disciplinary action.

d. Use of Social Media

Staff are expected to use social media in an ethical and responsible manner. Only the Advancement Department is authorized to open a social media account for Horizon House and will monitor the organization's social media account. Any posts about Horizon House on social media should be filtered through the Advancement Department.

Staff are expected to adhere to Horizon House Policies and Procedures around confidentiality. Signed consents and the involvement of the

1.4.1 CODE OF ETHICAL CONDUCT

Advancement Department are required before posting any information about participants on social media. All staff will adhere to the Social Media requirements outlined in the Employee Handbook, the Code of Ethics policy and procedure, as well as the Policy and Procedure on Media Relations 2.6.16.

e. **Financial Reporting and Records**

We have established and maintain a high standard of accuracy and completeness in documenting, maintaining, and reporting financial information. This information serves as a basis for managing our business and is important in meeting our obligations to participants, staff, stakeholders, suppliers, and others. It is also necessary for compliance with tax and financial reporting requirements.

All financial information will reflect actual transactions and conform to specific program financial regulations and/or generally accepted accounting principles. All funds or assets will be properly recorded in the books and records of Horizon House. Horizon House maintains a system of internal controls to provide reasonable assurances that all transactions are executed in accordance with management's authorization and are recorded in a proper manner so as to maintain accountability of the Agency's assets.

9. Intellectual Property Rights and Obligations

Any work created or completed by a staff during the scope of the staff's employment with Horizon House will be considered the property of Horizon House.

If any work created is copyrightable or patentable, then it will be considered a "Work for Hire" under the United States Copyright Act, with Horizon House being considered the author and owner of such work.

10. License and Certification Renewals

Staff, individuals retained as independent contractors, and practitioners in positions which require professional licenses, certifications, or other credentials are responsible for maintaining the current status of their credentials and to comply with all applicable State and Federal requirements relating to their discipline. Any individual who receives notice of possible disciplinary proceedings against them from any professional, credentialing or governmental body must immediately report the event to their supervisor and Human Resource Manager. A determination as to the person's ability to continue functioning in their current position will be made. Other appropriate positions may also be explored.

Horizon House may, at any time, require verification of an individual's current license or credential. Horizon House maintains procedures to assure documentation of compliance with each position description's requirement.

11. Personal Use of Horizon House Resources

It is the responsibility of each Horizon House staff to preserve our Agency's resources, including time, materials, supplies, equipment, and information. Agency assets are to be maintained for business related purposes. As a general rule, the personal use of any Horizon House asset without prior supervisory approval is

1.4.1 CODE OF ETHICAL CONDUCT

prohibited. One's supervisor must approve any community or charitable use of Agency resources in advance. Any use of Agency resources for personal financial gain is prohibited.

B. VALUE OUR PARTICIPANTS:

1. Create an Environment to Achieve Full Potential

Horizon House accepts that participants are individuals and capable of self-determination. We will promote dignity of participants and enhance their independence, self-sufficiency, and self-esteem.

2. Promote the Rights of the Participants to Make Choices

Horizon House will work to involve participants in all aspects of recovery/self-determination planning and view them as partners in recovery. We will step back and allow participants to become more independent as they demonstrate increased skills.

3. Respect Uniqueness and Diversity of Every Individual

Horizon House will work sensitively and respectfully with participants and families from different cultures. We make no distinctions in the availability of services; the admission, transfer or discharge of participants; or in the care we provide based on age, gender, disability, race, color, religion, national origin, or sexual orientation.

4. Treat Participants with Dignity and Respect

Horizon House will know, respect, promote and protect the basic human rights of its participants. Participants are treated in a manner that preserves their dignity, autonomy, self-esteem, civil rights, and involvement in their own care.

5. Strive to Provide the Highest Quality Service

Our mission is to provide high quality, cost-effective services to all our participants. To that end, we are committed to the delivery of safe, effective, efficient, and compassionate participant services. We treat all participants with warmth, respect, dignity, and provide care that is both necessary and appropriate.

This commitment to quality of care and participant safety is an obligation of every Horizon House staff. Accordingly, it is a fundamental principle of being part of Horizon House that each person dedicates himself or herself to achieving the goals described here. In addition, in any circumstance where a Horizon House staff has a question about whether the quality of care or participant safety commitments are being fully met, that individual is obligated to raise this concern through appropriate channels until it is satisfactorily addressed and resolved. Such channels include the program team members, supervisory and management staff, the Horizon House Compliance **Hotline**, and, if necessary, beyond the facility/agency.

6. Prohibit Harassment, Workplace Violence

Horizon House will not tolerate violence in the workplace, including any form of physical, verbal, or psychological abuse, direct or implied threats, stalking, threatening phone calls, harassment, domestic violence, any form of physical aggression, or sexual harassment toward participants, employees or independent contractors. Horizon House exercises a zero-tolerance policy towards an employee's being violent to a participant or to another employee. Workplace violence also includes acts of violence (including direct or implied threats) against property including such behaviors as deliberate damage or sabotage. Any threats or acts of workplace violence must be reported immediately to supervisory staff, Human Resources, or any member of management.

7. Reporting Neglect or Abuse

All Horizon House employees have a duty to report any actual or perceived neglect or abuse of a participant or theft of a participant's funds or property to the Agency's Investigation Hotline.

8. Encourage Family Involvement

We will inform participants and, where appropriate and with authorization, their family members or legal guardians of key aspects of their care and treatment. We encourage family participation in service planning towards recovery.

C. VALUE OUR EMPLOYEES

1. Recognize and Support the Challenges

Horizon House is committed to supporting all employees and independent contractors as well as helping them to achieve their fullest potential in a fair and equitable manner. We will strive to understand the duties, responsibilities and challenges that face our fellow employees.

2. Provide and Participate in Training

Administrators and supervisors will take reasonable steps to provide or arrange for continuing education and staff development for all staff for whom they are responsible. Continuing education and staff development will address current knowledge and emerging developments related to designated fields of practice and ethics.

3. Maintain a Professional Working Relationship

Simply said, use good judgment and high ethical standards in all working relationships. Conduct yourself with honesty, fairness, and treat others as you wish to be treated with courteous attitude, respect, and enthusiasm.

We will conform to the standards of our professions and use reasonable judgment and objectivity in the performance of our duties. In doing so, we will not provide direct services to family members or close friends and will advise our supervisor if this situation arises. When we are confronted with duties that are beyond our professional scope, we will refer to others with expertise.

Professional boundaries are expected from all staff, however, peer support staff are expected to share lived experiences in the context of their work with participants. In a

1.4.1 CODE OF ETHICAL CONDUCT

positive, supportive relationship boundaries and limits are negotiated between the peer supporter and the person receiving the support. The nature of the relationship is mutually accountable with responsibility shared by helper and the person receiving support. The peer supporter is an advocate, an intermediary and supporter of first and last resort.”

4. Avoid Conflicts of Interest

Personal Activity

Employees will avoid actions that involve or appear to involve a conflict of interest with their obligations to Horizon House. Employees should not personally benefit from doing business with Horizon House, should not have independent business relationships with those who do business with Horizon House, should not use Horizon House property for their personal benefit, and should not compete with Horizon House.

In striving to avoid a conflict of interest, Horizon House prohibits personal relationships between employees and participants, or participant’s families. Employees may not ask for, borrow, or accept any funds or property from participants.

Gifts

If you receive gifts or discounts from suppliers, participants or family of participants that are not available to all employees, ask yourself, “Why?” These gifts are frequently intended to influence decision-making. To avoid the potential of impropriety, you should decline gifts unless they can be shared with the program. Discounts available to all Horizon House employees may be accepted.

Outside Employment and Affiliations

Horizon House will not prohibit employees from holding other jobs. However, every employee has a duty to disclose any outside employment to his/her supervisor regardless of whether any potential conflict of interest is perceived. If the outside employment causes performance problems in the employee’s work at Horizon House, management may require that such outside employment be discontinued.

Witnessing of Documents

Horizon House staff will not be a witness to any legal document for participants, including but not limited to powers of attorney, guardianship, wills, and advance directives. As needed, staff will refer participants to resources that can assist in witnessing these documents.

Soliciting donations from Participants

Horizon House does not solicit donations from participants. Participants have the option to participate in raffles, and they can also donate to Horizon House only with the understanding that they are doing so with sound judgement and the understanding that it is voluntary. They are given a tax deduction letter to acknowledge the donation.

Organizational Fundraising

All organizational fundraising efforts should be coordinated through the Advancement Department at Horizon House. All donations received should immediately be reported to the Advancement Department where they will be entered in the data system. All organizational fundraising efforts and donations will be handled based on the procedures outlined in the Organizational Fundraising Policy and Procedure 1.4.3.

5. Provide a Safe Work Environment

1.4.1 CODE OF ETHICAL CONDUCT

We will take reasonable precautions to ensure our own safety as well as the safety of participants, visitors, families, and other personnel. Horizon House encourages the practice of safety by thinking defensively, anticipating potential hazards, and reporting unsafe conditions immediately.

All Horizon House facilities comply with all regulations and rules that promote the protection of workplace health and safety. Our policies have been developed to protect our staff from potential workplace hazards. Staff must become familiar with and understand how these policies apply to their specific job responsibilities and seek advice from their supervisor whenever they have a question or concern. It is important that each staff immediately advise his or her supervisor of any serious workplace injury or any situation presenting a danger of injury, so timely corrective action may be taken to resolve the issue.

6. Harassment and Workplace Violence

Each Horizon House staff has the right to work in an environment free of harassment and disruptive behavior. We do not tolerate harassment by anyone based on the diverse characteristics or cultural backgrounds of those who work with us. Degrading or humiliating jokes, slurs, intimidation, or any other harassing conduct is not acceptable in our workplace.

Sexual harassment is prohibited. This prohibition includes unwelcome sexual advances or requests for sexual favors in conjunction with employment decisions. Moreover, verbal or physical conduct of a sexual nature that interferes with an individual's work performance or creates an intimidating, hostile, or offensive work environment is prohibited at Horizon House.

Harassment also includes incidents of workplace violence. Workplace violence includes robbery, staff property damage and other commercial crimes, stalking, violence directed at the employer, terrorism, and hate crimes committed by current or former staff.

Staff who observe or experience any form of harassment or violence should report the incident to their supervisor, the Human Resources Department, or a member of management.

7. Relationships with Horizon House Colleagues

In the normal day-to-day functions of an organization like Horizon House, there are issues that arise which relate to how people in the organization deal with one another. It is impossible to foresee all of these, but there are a couple of situations that routinely arise.

- a. Gift giving on special occasions such as birthdays, showers or weddings are an example. While there are no strict rules, no one should ever feel compelled to give a gift to anyone. Gifts should be appropriate to the circumstances. A lavish gift to anyone in a supervisory capacity would be inappropriate.
- b. Fundraisers for schools, selling items such as Avon or candles, and other similar events are not allowed during work hours. No one should feel pressured to make purchases. Horizon House encourages staff to direct these activities to family and friends outside of the agency.
- c. Personal relationships may also develop between employees. If a relationship develops between a supervisor and a subordinate staff person, those employees are expected to discuss the situation with the next

1.4.1 CODE OF ETHICAL CONDUCT

supervisory level. Because of the appearance of favoritism, every effort will be made to relocate one of the employees to a different work setting.

8. Maintain an Environment Free of Illegal Substances

To protect the interests of our staff and participants, we are committed to an alcohol and drug-free work environment. All staff must report for work free of the influence of alcohol and illegal drugs. Reporting to work under the influence of any illegal drug or alcohol; having an illegal drug in a staff's system; or using, possessing, or selling illegal drugs while on Horizon House work time or property may result in immediate termination. We may use random drug testing as a means of enforcing this policy.

It is also recognized that individuals may be taking prescription or over-the-counter drugs, which could impair judgment or other skills required in job performance. Staff with questions about the effect of such medication on their performance or who observe an individual who appears to be impaired in the performance of his or her job must immediately consult with their supervisor.

Horizon House recognizes the effects of impairments (e.g., intoxication, drug relapse, psychological impairment) on professional performance and the need to seek appropriate treatment. To assist you in these situations, we offer the services of Carebridge Employee Assistance Program *free of charge*. These are just a few of the services Carebridge will provide: counseling, daycare arrangements (for children and elderly,) legal referral, and other assistance services. We encourage you to utilize these services voluntarily. If a personal issue begins to affect your work, management may require you to contact the EAP with a supervisory referral.

D. RESPECT ALL OUR STAKEHOLDERS

1. Promote Good Stewardship of the Public Trust

Horizon House recognizes a responsibility to participate in activities that contribute to a better community and society. Horizon House will always strive to be good neighbors in the community.

2. Adhere to All Contracts

We will compensate providers and vendors at fair market value. Every payment will be supported by proper documentation confirming that the services contracted for were provided. Horizon House employees or volunteers will not solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts.

3. Maintain a Transparent Relationship with Stakeholders, Free of Personal Interest or Benefits

Horizon House employees are expected to exhibit professional responsibility and professional loyalty to Horizon House. All employees are expected to avoid conflicts of interest and opportunities for personal gain for themselves, members of their immediate families and others.

4. Conduct Ourselves as Good Neighbors Within the Community

Active participation by employees in religious, community, professional or charitable organizations is encouraged. Approval is not required to participate in or accept appointment as a trustee or director of a non-profit organization unless there is a

1.4.1 CODE OF ETHICAL CONDUCT

potential conflict of interest between the organization and Horizon House. Participation should not include representing the policies or views of Horizon House.

5. Sponsoring Business Events

Horizon House may sponsor events with a legitimate business purpose (e.g., board meetings or retreats.) Provided that such events are for business purposes, reasonable and appropriate meals and services may be offered. In addition, transportation and lodging may be provided.

Gifts

It is critical to avoid the appearance of impropriety when giving gifts to individuals who do business or are seeking to do business with Horizon House. We will never use gifts or other incentives to improperly influence relationships or business outcomes. In order to avoid embarrassment, an effort should be made to ensure that any gift we extend meets the business conduct standards of the recipient's Agency. All gifts given to others require the approval of the CEO.

6. Ineligible Persons

We do not contract with, employ, or bill for services rendered by an individual or entity that is excluded or ineligible to participate in Federal health care programs, suspended or debarred from Federal government contracts and has not been reinstated in a Federal health care program after a period of exclusion, suspension, debarment, or ineligibility. We routinely search the Department of Health and Human Services' Office of Inspector General and General Services Administration's list of such excluded and ineligible persons.

Staff, vendors, and privileged practitioners at one or more Horizon House facilities are required to report to us if they become excluded, debarred, or ineligible to participate in Federal health care programs.

7. Government Relations and Political Activities

Horizon House and its representatives comply with all Federal, State, and local laws governing participation in government relations and political activities. Horizon House funds or resources are not contributed directly to individual political campaigns, political parties, or other agencies which intend to use the funds primarily for political campaign objectives.

When the Agency is directly impacted by public policy decisions, it may provide relevant, factual information about the impact of such decisions on the private sector. The Agency only takes positions that it believes can be shown to be in the larger public interest. The Agency encourages trade associations with which it is associated to do the same.

It is important to separate personal and corporate political activities in order to comply with rules and regulations relating to lobbying or attempting to influence government officials. No use of corporate resources, including e-mail is appropriate for personally engaging in political activity. A staff may, of course, participate in the political process on his or her own time and at his or her own expense. While doing so, it is important that Horizon House staff not give the impression they are speaking on behalf of or representing Horizon House in these activities.

At times, Horizon House may ask staff to voluntarily make personal contact with government officials or to write letters to present our position on specific issues. In

1.4.1 CODE OF ETHICAL CONDUCT

addition, it is a part of the role of some Horizon House management to interface on a regular basis with government officials. If a staff is making these communications on behalf of the Agency, he or she must be certain to be familiar with any regulatory constraints and observe them.

E. ETHICS AND COMPLIANCE PROGRAM PLAN

1. Program Structure

The Compliance Program is intended to demonstrate in the clearest possible terms the absolute commitment of the Agency to the highest standards of ethics and compliance. Providing direction, guidance, and oversight is the Quality Improvement Council, consisting of Senior Management and other staff and the Operations Committee of the Board.

The Director of Organizational Quality and Compliance is responsible for the day-to-day direction and implementation of the Compliance Program. This includes developing resources (including policies and procedures, training programs, and communication tools) for and providing support (including operating the Compliance **Hotline**, conducting program assessment, and providing advice) to the CEO, Board, and others as appropriate.

Another important resource that may be able to address issues arising out of this Code of Ethical Conduct is the Human Resources Manager. Human Resources Managers are highly knowledgeable about many of the compliance risk areas described in this Code of Ethical Conduct that pertain to employment and the workplace and are responsible for ensuring compliance with various employment laws. Every effort should be made to resolve workplace conduct and employment practice issues through the individual's supervisor and the Human Resources Manager.

2. Setting Standards

With respect to our Compliance Program, we set standards through this Code of Ethical Conduct and Compliance policies and procedures and, occasionally, through other guidance mechanisms, such as memos and newsletters. It is the responsibility of each individual to be aware of those policies and procedures that pertain to his or her work and to follow those policies and procedures.

3. Training and Communication

Comprehensive training and education have been developed to ensure that staff throughout the Agency are aware of the standards that apply to them. The Ethics training is conducted at the time an individual joins the Agency and annually for all staff. Compliance training in areas of compliance risk (e.g., billing, coding) is required of certain individuals depending on their job duties.

4. Resources for Guidance and Reporting Concerns

To obtain guidance on an ethics or compliance issue or to report a concern, individuals may choose from several options. We encourage the resolution of issues, including human resources-related issues (e.g., payroll, fair treatment and disciplinary issues,) at the program level. It is an expected good practice, when one is comfortable with it and thinks it appropriate under the circumstances, to raise concerns first with one's supervisor. If it is uncomfortable or inappropriate, the individual may discuss the situation with the Human Resources Manager or another member of management at the facility or in the Agency. Individuals may also contact the Compliance **Hotline** at

1.4.1 CODE OF ETHICAL CONDUCT

(215) 386-3838 ext. 12249 or use the confidential email address of Compliance.hotline@hhinc.org.

Horizon House makes every effort to maintain, within the limits of the law, the confidentiality of the identity of any individual who reports concerns or possible misconduct. There is no retribution or discipline for anyone who reports a concern in good faith. Any staff who deliberately makes a false accusation with the purpose of harming or retaliating against another staff, however, is subject to discipline.

5. Personal Obligation to Report

Horizon House is committed to ethical and legal conduct that is compliant with all relevant laws and regulations and to correcting wrongdoing wherever it may occur in the Agency. Each staff has an individual responsibility for reporting any activity by any staff, physician, subcontractor, or vendor that appears to violate applicable laws, rules, regulations, accreditation standards, standards of professional practice, Medicaid requirements, or this Code. If a matter that poses serious compliance risk to the Agency or involves a serious issue of health or participant safety is reported locally, and if the staff reporting it doubts that the issue has been given appropriate attention, the staff should report the matter to higher levels of management or the Compliance Hotline until satisfied that the full importance of the matter has been recognized.

6. Internal Investigations of Reports

We are committed to investigating all reported concerns promptly and confidentially to the fullest extent possible. The Compliance Officer coordinates any findings from corporate-led investigations and recommends corrective action or changes that need to be made. We expect all staff to cooperate with investigation efforts.

7. Plan of Correction

Where an internal investigation substantiates a reported violation, it is the policy of the Agency to initiate plan of correction, including as appropriate, making prompt restitution of any overpayment amounts, notifying the appropriate government body, instituting whatever disciplinary action is necessary, and implementing systematic changes to prevent a similar violation from recurring in the future.

8. Discipline

All violators of the Code will be subject to disciplinary action. The discipline utilized will depend on the nature, severity, and frequency of the violation and may result in any or all of the following disciplinary actions:

- Oral warning
- Written warning
- Written reprimand
- Suspension
- Termination and/or
- Restitution

9. Measuring Program Effectiveness

We are committed to assessing the effectiveness of our Compliance Program through various efforts. Much of this effort is provided by internal audits of issues that have regulatory or compliance implications. The Compliance Officer conducts reviews of the ethics and compliance programs designed to assess their effectiveness.

1.4.1 CODE OF ETHICAL CONDUCT

10. Acknowledgement Process

Horizon House requires all staff to sign an acknowledgement confirming that they have received the Code of Ethical Conduct, understand that it represents mandatory policies of Horizon House, and that they agree to abide by it. These acknowledgement forms will be placed in the personnel file of each employee. Each Horizon House staff is also required to participate in annual refresher training of the Code of Ethical Conduct. Records of such training will be retained in each employee's training record.

To obtain further guidance on an ethics and compliance issue or to report a suspected violation of our Code of Conduct:

- **DISCUSS** the situation with your supervisor
- **DISCUSS** the situation with the Compliance Officer; or
- **CALL** the Corporate Compliance **Hotline** at 215-386-3838, ext. 12249.
- **USE** the confidential email: Compliance.Hotline@hhinc.org.

VII. REVISION HISTORY

<u>DATE</u>	<u>Rev. No.</u>	<u>Modification</u>	<u>Reference Section(s)</u>
6/1991	1	Date First Issued	All
6/2006	2	Substantial Revision	All
7/2007	3	Partial Revision	Page 8
2/2010	4	Change to New Format; Wording Revisions Throughout	All
4/2010	5	New Format and Major Revisions	All
2/20116		Wording Revisions Throughout	All
7/2016	7	CARF Requirement and HIPAA	All
7/2019	8	Minor update	All
9/2024	9	Minor Update	All

VIII. FORMS – Code of Ethical Conduct Acknowledgement Forms

- IX. REFERENCES:** CARF Behavioral Health Manual
Federal False Claims Act
Federal Anti-kickback Statute
PA Medicaid Provider and Whistleblower Act
DE Medicaid Provider and Whistleblower Act
Health Insurance Portability and Accountability Act (HIPAA)
Stark Law