

SWMBH Operating Policy 10.3

Subject: Code of Conduct Distribution and Training		Accountability: Compliance	Effective Date: 1/1/2014	Pages: 2	
REQUIRED BY: BBA Section _____ PIHP Contract Section _____ NCQA/URAC Standard _____ Other _____			Last Reviewed Date: 10/4/18	Past Reviewed Dates: 1/1/14 5/13/16 5/17/17	
LINE OF BUSINESS: <input checked="" type="checkbox"/> Specialty Waiver (B/C) <input checked="" type="checkbox"/> 1115 Waiver <input checked="" type="checkbox"/> Healthy Michigan <input checked="" type="checkbox"/> SUD Medicaid <input checked="" type="checkbox"/> SUD Block Grant <input type="checkbox"/> MI Health Link <input type="checkbox"/> OTHER: _____		APPLICATION: <input checked="" type="checkbox"/> SWMBH Staff and Ops <input type="checkbox"/> Participant CMHSPs <input type="checkbox"/> SUD Providers <input type="checkbox"/> MH / DD providers <input type="checkbox"/> Other: _____		Last Revised Date: 10/4/18	Past Revised Dates:
Approved : <i>Mila C. Joad</i> Date: <i>10-11-18</i>			Required Reviewer: Chief Compliance & Privacy Officer		

I. Purpose

The purpose of this policy is to articulate Southwest Michigan Behavioral Health’s (SWMBH) procedures related to the Code of Conduct. Specifically, how it is distributed and the training that SWMBH’s employees complete in accordance with the Code of Conduct.

II. Policy

The Code of Conduct serves as a foundational document that details the fundamental principles, values and framework for action within SWMBH’s compliance program. The Code of Conduct articulates SWMBH’s commitment to comply with all applicable Federal and State standards. The standards not only address compliance with statutes and regulations, but also set forth broad principles that guide employees in conducting business professionally and properly. The standards included in the Code of Conduct will promote integrity, support objectivity and foster trust. Furthermore, the SWMBH standards of conduct will reflect a commitment to high quality health care delivery, as evidenced by its conduct of on-going performance assessment, improved outcomes of care and respect for the rights of SWMBH’s customers.

III. Standards and Guidelines

- A. It is the responsibility of each supervisor to ensure that the personnel within their supervision are aware of and are acting ethically and in compliance with applicable laws and the Code of Conduct. Accordingly, all personnel are required to familiarize themselves with the Code and to return a signed acknowledgment statement within thirty (30) days of employment.
- B. Each new SWMBH employee will receive (1) a copy of the Code of Conduct and (2) general training materials regarding SWMBH’s Regulatory Compliance Plan within 30 days of being hired. SWMBH’s Chief Compliance Officer, or his/her designee, will communicate more detailed and specific policies and training, as needed.
- C. Failure of any personnel to receive the SWMBH Code of Conduct within thirty days (30) days of the employee’s hire date shall be reported to SWMBH's Chief Compliance Officer (CCO), with a

SWMBH Operating Policy 10.3

signed and dated Code and Training acknowledgement statement, if completed, or by an action plan for immediate compliance.

- D. All SWMBH personnel will receive updated training annually as arranged and administered by the CCO. Failure to attend or receive such scheduled training will be subject to disciplinary action and/or an action plan for immediate compliance.

IV. Definitions

- A. None

V. References

- A. 42 CFR, Ch. IV §438.608 and Federal Register Volume 64, No. 219

VI. Attachments

- A. SWMBH 10.3A Code of Conduct