



Brooklyn Health Home Code of Conduct

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INTRODUCTION

Southwest Brooklyn Health Home LLC ("BHH") was formed on April 1, 2012 and received approval for its formation from the State of Delaware on August 14, 2012 as a limited liability company. The Organization was registered under Section 802 of the New York Limited Liability Company Law. Authorized under Section 365 of the New York State Social Services Law, the Organization is a Medicaid Health Home serving patients in Brooklyn who suffer from chronic disease and mental illness. BHH provides services through a network of organizations working together to coordinate care for eligible Medicaid beneficiaries. The organizations with which BHH contracts for the provision of care management services to its enrollees include hospitals, medical and mental health centers, substance abuse treatment programs and supportive housing providers.

BHH is owned by six organizations, namely, CAMBA, Inc., iHealth, Lutheran Medical Center, Maimonides Medical Center ("MMC"), Village Care of New York, Inc., and Visiting Nurse Service of New York. Management services and support are provided by Maimonides Medical Center (MMC) pursuant to a Management Services Agreement (MSA), and MMC staff who provide support to BHH are subject to MMC's policies and procedures, including the Maimonides Code of Conduct.

BHH has contracted with BTQ Financial (the "Fiscal Manager") to provide accounting and financial management services. The Fiscal Manager oversees fiscal operations and provides strategic financial consultation, and assists BHH with planning and budgeting. The Fiscal Manager provides these services both at the BHH offices at and from its own offices.

This Code of Conduct outlines the standards that apply to members of the BHH Board, BHH management and employees, consultants and vendors with whom BHH does business, and to the Care Management Agencies (CMAs) through which care management and care coordination services are provided to Medicaid beneficiaries enrolled in BHH. The Code of Conduct serves as a guide for the performance of daily duties and describes the standards of conduct which govern relationships with patients, affiliated physicians and other members of a patient's care team, Medicaid managed care organizations, vendors, subcontractors, independent contractors, consultants and among and between BHH staff.

STANDARDS OF CONDUCT

PATIENT PRIVACY AND CONFIDENTIALITY

Releasing patient-specific information to unauthorized individuals or discussing such information in elevators and other public areas is prohibited. Do not share patient-specific information with any employee of or consultant to Brooklyn Health Home (BHH) or participating Care Management Agency (CMA) other than that necessary for to support that individual or agency's authorized role in BHH. Make sure BHH patient information stored in computer systems is properly safeguarded.

CODING AND BILLING FOR SERVICES

Health Home outreach and care management services rendered by CMAs participating in BHH must be properly documented by the appropriate individuals. All bills submitted to third-party payors for Health Home outreach and care management services rendered by CMAs participating in BHH must be accurate and complete, reflecting actual services rendered. It is prohibited to present false, fictitious or fraudulent claims for payment or approval.

FRAUD AND ABUSE / REFERRALS

BHH does not pay or offer to pay anyone for the referral of patients to BHH. BHH accepts patients based solely on the Health Home enrollment criteria established by the New York State Department of Health and BHH's ability to render the needed services. It is also prohibited for any BHH employees, consultants or

participating CMAs to solicit or receive anything of value, either directly or indirectly, in exchange for a referral of patients to any other healthcare provider.

RELATIONSHIPS WITH VENDORS

Vendors, subcontractors and suppliers of goods and/or services to BHH are to be selected on objective criteria, including quality, service, price, delivery capability and technical excellence. Personal relationships and friendships play no part in the selection process. Accepting bribes or kickbacks is strictly prohibited.

GIFTS AND ENTERTAINMENT

As a general rule, BHH Board Members, members of the BHH management team and employees, may not accept gifts or favors from individuals or companies with whom BHH does business. Token gifts with a total value of \$25.00 or less are permitted, but cash or cash equivalents, such as gift certificates, may not under any circumstances be accepted from anyone, including patients and affiliated physicians. Under no circumstances may gifts be solicited. No gift, no matter how low in value, should be accepted if its acceptance would influence one's business judgment.

CONFLICTS OF INTEREST

A conflict of interest may arise if outside activities or personal interests influence or appear to influence one's ability to make objective decisions in the course of fulfilling job responsibilities, or the demands of outside activities may hinder or distract one from performing his or her job. It is the responsibility of each BHH Board member, members of the BHH management team and others involved in BHH to ensure that he or she remains free of conflicts of interest. Members of the BHH Board and staff involved in management of BHH must disclose any financial interest that they or members of their immediate families have in an entity that does business with BHH. Such disclosures may occur at any time, but shall be solicited by BHH not less frequently than annually.

BOOKS AND RECORDS

Since BHH's books and records reflect the Organization's business transactions and serve as a basis for care management decisions, it is essential that they be accurately maintained. Financial information must reflect actual transactions, which must be accurately and properly recorded so as to maintain accountability of BHH assets. It is prohibited to establish an undisclosed or unrecorded account, to use an account to conceal a BHH asset, or to falsify, alter or tamper with financial records. Changes to medical records related to Health Home outreach or care management services may be made only by authorized individuals, and the destruction or removal of such records must be in accordance with BHH record retention policies.

CONFIDENTIAL INFORMATION

Information about BHH strategies and plans, operations, patients and personnel is confidential and should be protected. Don't disclose confidential information to others outside of BHH unless the individuals have a legitimate need to know and have agreed to maintain the confidentiality of the information. Under no circumstances may confidential information be used by anyone involved in BHH for personal benefit, even after one has discontinued his or her association with BHH.

SOFTWARE AND INTELLECTUAL PROPERTY

All persons involved with BHH shall honor copyrights and software license agreements. Software or copyrighted documents not authorized for reproduction shall not be copied. Software purchased for personal use may not be copied into work done for BHH or installed on BHH office computers.

ELECTRONIC MEDIA

Communication systems, including e-mail, Internet access and voice mail, provided for use in connection with the management of BHH are to be used for business purposes. These communications systems may be used for personal business on a limited basis, but it should be understood that these communications are not private. BHH prohibits the use of communications channels or Internet access to post, store, transmit, download or distribute material that is threatening, knowingly or intentionally false, obscene, harassing or gives rise to a civil liability or criminal offense. These channels of communication may not be used to send chain letters, personal broadcast messages or copyrighted documents not authorized for reproduction, nor used to conduct a job search or open misaddressed mail. Staff shall be prohibited from copying information from BHH electronic files onto removable media (e.g., thumb drives, DVDs, etc.)

SEXUAL HARASSMENT/DISCRIMINATION

BHH is committed to providing a work environment free of harassment. BHH will not tolerate any form of sexual harassment or discrimination. Degrading or humiliating jokes, slurs, intimidation and verbal or physical conduct of a sexual nature that interferes with an individual's work performance or creates a hostile or offensive environment has no place at BHH and is prohibited.

WORKPLACE VIOLENCE

BHH will not allow any form of workplace violence. Fighting, stalking, violation of a restraining order, terrorism or hate crimes or threats of violence, is strictly prohibited. Anyone who reports to work with guns, knives or other weapon is subject to immediate dismissal.

HEALTH AND SAFETY

BHH confirms its obligation to maintain and promote workplace safety. BHH staff and consultants who see a situation or condition which they think may be potentially damaging to the environment or poses a safety hazard, are asked to advise a supervisor who will be responsible for addressing the situation.

SUBSTANCE AND ALCOHOL ABUSE

To protect the safety and welfare of BHH patients and colleagues, all employees are expected to be free of the influence of alcohol and illegal drugs when performing their jobs. BHH staff who report to work under the influence of an illegal drug or alcohol, have an illegal drug in his / her system, abuse prescription drugs or possess or sell illegal drugs while at work may be subject to immediate termination.

PERSONAL USE OF COMPANY ASSETS

All to whom this Code of Conduct applies are responsible for preserving BHH assets, including time, materials, supplies, equipment and information, and for using BHH assets for business-related purposes. Occasional use of such items as copying facilities or telephones, where the cost to BHH is insignificant, is permitted. Any use of BHH resources for personal financial gain is strictly prohibited.

MARKETING AND ADVERTISING

All BHH promotional materials must be truthful and non-deceptive, and shall accurately describe the Health Home care management services provided by BHH.

POLITICAL ACTIVITIES

BHH resources may under no circumstances be used to support political activities.

WHERE TO TURN?

BHH has created a Compliance Program to provide employees and others with several options to turn to for help in the event that one has information about a possible crime or ethical violation. It is a good practice to raise concerns first with a supervisor or senior manager. If this approach is uncomfortable or inappropriate, individuals with concerns are encouraged to call the BHH Compliance Officer or the 24 hour, toll-free Compliance Helpline at **1-844-787-9171**.

Each person involved in BHH has an individual responsibility to report any activity that appears to violate applicable laws, regulations or BHH standards. Violations of legal and ethical standards destroy the Organization's reputation and, in turn, can hurt an employee and his/her co-workers and/or others involved in BHH. It is critical that anyone who believes there to have been a violation of BHH policy notify a member of the BHH management team or Board. It is BHH policy that there will be no retribution against anyone who makes a good-faith report of a possible violation.

An individual who believes someone has violated the law or BHH policy, or is engaging in activities that could damage BHH's reputation, should contact any one of the following:

- the individual's supervisor
- another member of the BHH management team
- the BHH Compliance Officer at 718-283-7722

The 24-hour, toll-free BHH Compliance Helpline at **1-844-787-9171**.

COMPLIANCE HELPLINE

BHH uses a toll-free helpline, staffed by an outside company to provide a convenient and confidential way for an individual to report violations of the law or BHH policy or to seek guidance on a particular ethical issue. BHH staff are encouraged to discuss their concerns first with a supervisor or member of the BHH management team. The BHH Compliance Helpline provides an alternative for use if someone is uncomfortable with talking with a supervisor or member of the BHH management team, or would prefer to report a concern anonymously. The toll-free Compliance Helpline may be reached at **1-844-787-9171**, and is available 24 hours a day, 365 days a year.

WHAT HAPPENS WHEN I CALL THE COMPLIANCE HELPLINE?

Your call will be answered by a trained Communications Specialist who listens to your concerns. If necessary, the Communications Specialist will ask you follow-up questions to gather further information. At the close of the call, you will be given an individual code number and a follow-up date for you to call back. Calls are never recorded or traced.

DO I HAVE TO GIVE MY NAME?

No. You may give your name if you choose to, but you are not required to identify yourself. The code number assigned by the Communications Specialist is designed to protect your identity. Some concerns, though, may be of such a nature that the caller's identity will become known during the course of the investigation. In such instances BHH will make every effort to keep the caller's identity confidential.

WHAT HAPPENS AFTER MY CALL TO THE COMPLIANCE HELPLINE?

After your call, the Communications Specialist will prepare a written report based on the information you provided and forward it to the Compliance Officer. The Compliance Officer will investigate the matter or assign the report to the appropriate area for review. You will be advised of the status of your concern when you call back on your follow-up date. If additional information is needed in order to fully investigate the matter, the Compliance Specialist will ask you follow-up questions when you call back. No disciplinary or legal action will be taken based only on a call to the Compliance Helpline. Only substantiated findings will result in action.

THE COMPLIANCE PROGRAM AT WORK

You've made the call to the Compliance Helpline or reported your concerns to your supervisor or the Compliance Officer. What is the next step?

INVESTIGATION OF REPORTS

Each call to the Compliance Helpline results in a written report forwarded to the BHH Compliance Officer. The Compliance Officer will analyze the Compliance Helpline reports and all reports received directly or forwarded to the Compliance Officer. Depending on the nature of the reported concern, the Compliance Officer will personally investigate the matter or assign it to the appropriate department for investigation. All investigations will be conducted as promptly and confidentially as possible. All concerned are expected to cooperate with all investigation efforts.

CORRECTIVE ACTION

If an investigation substantiates a reported violation, BHH will take the steps necessary to correct the problem. Depending on the violation, corrective action may consist of disciplining the offender, paying back an insurer or payer any overpayment amounts incorrectly billed to the payer, or notifying the appropriate governmental agencies of the error or wrongdoing. Sometimes an investigation or internal audit uncovers a lax or improper practice or procedure that creates the potential for violations. In such cases, the Compliance Officer will work with the appropriate parties in proposing recommendations to correct the situation. This may include, for example, instituting new procedures or modifying existing ones, terminating a relationship with a vendor or providing additional / focused compliance training.

DISCIPLINE

Any BHH employee or contractor who has been found to have violated a law or an ethical standard will be appropriately disciplined. All disciplinary actions will be applied consistently and fairly, and will be determined case by case, based on the facts of each situation. Depending on the violation, disciplinary action may take the form of:

- Verbal warnings
- Written warnings
- Retraining, reassignment or modification of job responsibilities
- Suspension without pay
- Restitution
- Termination of employment or contract

MONITORING AND AUDITING

Monitoring is an integral part of the compliance program. As part of our ongoing evaluation process, the BHH Compliance Officer will routinely conduct and supervise internal audits of issues that have regulatory or compliance implications. Please contact the Compliance Officer with issues or practices you believe should be surveyed or reviewed to ensure that BHH is in compliance with the law and applicable regulatory requirements.

BACKGROUND CHECKS

As part of the monitoring and auditing process, BHH has established systems to conduct periodic checks of BHH employees, participating CMAs against the federal government's data bases (OIG Cumulative Sanction Report and GSA List of Excluded Parties) to identify individuals and/or organizations excluded from participation in the Medicaid program. BHH shall verify the employment history, educational credentials and licensure, if appropriate, of prospective BHH employees.

BE A GOOD BHH CITIZEN--ACT RESPONSIBLY AND ETHICALLY

BHH employees should ask themselves the following questions as they aim to make ethical decisions:

- Am I uncomfortable with a particular action?
- Would I be embarrassed to discuss my action with my family and friends?
- Could someone's life, health or safety be endangered by my action?
- Could my action appear improper to others?
- Have I witnessed an action which I believe violates the law or an ethical standard?

Remember, failure to comply with legal, ethical and moral standards may result in serious consequences, both to you personally, and to BHH.

Report suspected violations.

If in doubt, seek help.

Call the Compliance Helpline at **1-844-787-9171**, or

Contact the BHH Compliance Officer at 1-718-283-7722.

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