



CARE PLUS NJ'S CODE OF CONDUCT HANDBOOK

CARE PLUS NJ CODE OF CONDUCT
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Message from the President/CEO

January 2003

Dear Care Plus Staff,

As we continue to take pride in the services we provide to our clients and Communities, and strive to (achieve) "...excellence in Mental Health care", the recognition that our actions be guided by, and must meet, the highest ethical standards of business and professional practices, has to become an integral component of our "Corporate Culture". This will require increased awareness of the Care Plus' Policies, Procedures, and business relationships, and an increase in our personal and professional responsibility to monitor the actions we take in this context: and, a more formal process of monitoring Corporate Compliance to established Policies and external Regulatory requirements. The Corporate Compliance Policy, and in particular the Code of Conduct expected of us as Care Plus NJ employees, are a important elements of this process.

The establishment of this Policy sets forth the principles and standards on how Care Plus NJ conducts its business; hence the focus of our awareness should be on Corporate accountability. While Departments and/or Programs need to adhere to their particular obligations, this needs to occur within the context of overall Corporate Compliance. Departmental policies are therefore subsidiary to the Care Plus NJ, Inc. policies. I ask that each employee support and commit to follow the Corporate Compliance Policy.

Please take the time to read and become knowledgeable about the intent and inherent expectations of the Corporate Compliance Policy, and feel free to ask for guidance and clarifications when needed. A number of new monitoring practices will be instituted, under the direction of Brigitte Johnson, Esq. Ms Johnson has been appointed as the Corporate Compliance Officer for Care Plus NJ, and along with a Corporate Compliance Committee, will be responsible for the implementation of this Policy. The qualifications and personal characteristics she brings to this role are impeccable. The development of the Corporate Compliance Policy has been her responsibility, and the product of many hours of research and hard work is consistent with our standards for excellence.

As President/CEO of Care Plus NJ I fully endorse the Corporate Compliance Policy. I am mindful of the additional burden this may pose on each of us, and of the concerns about "policing" the Agency, but the importance of responding to increased Regulatory vigilance through an internal monitoring process is indisputable, and will help us avoid much bigger problems in the future.

Yours truly,

Joseph A. Masciandaro
President/CEO

Care Plus NJ's Mission Statement

Our Mission

This Agency is dedicated to excellence in mental health care and has a commitment to life-long support needed by individuals and their families to ensure that they achieve their full potential to improve the quality of their lives.

Our Vision

Care Plus strives to be a leader in the delivery of mental health, case –management and focused health care services through the effective application of clinical and administrative cutting edge technologies. The Agency is focused on quality and growth both in terms of the expansion of its continuum of clinical services and its geographic distribution system. Care Plus will support its staff's educational goals and assist them in the pursuit of professional licenses and certifications through financial support and facilitation of relevant professional experiences. Care Plus seeks partnership with other healthcare or community organizations in pursuing service opportunities.

Our Values

Care Plus acknowledges and respects the social, spiritual and cultural experience of consumers. The involvement of the consumer and significant family members in treatment, recovery and ongoing social supports are cornerstones in the Care Plus Commitment to excellence.

Care Plus respects consumer choice and is committed to maintaining access for populations in need.

Care Plus views Agency staff as its most important resource. The growth and development of individuals and the group as a team is a high priority and an ongoing focus.

Care Plus provides high-quality care for all segments of the population without discrimination by age, race, gender, economic status or religion.

Care Plus has a long history of commitment to serve, leadership and excellence in community based services.

Purpose For Corporate Compliance Program and Our Code of Conduct

The purpose of the Care Plus NJ ¹Compliance Program is, in conjunction with our Agency policies and procedures, to establish and maintain guidelines for the ethical and legal operation of the Agency. The Corporate Compliance Program includes various mechanisms to prevent and detect violations of the law in our practice of doing business. The operation of an effective Corporate Compliance Program will help protect the Agency and its employees² in the event of a government investigation into any area of our operations. The Corporate Compliance serves to demonstrate to any government investigative entity that we are committed to abiding by the laws and regulations governing our industry.

The Code of Conduct is a crucial component of our overall Corporate Compliance Program. We developed the Code of Conduct to ensure we meet our ethical standards and are in compliance with applicable laws and regulations.

Our Code of Conduct provides guidance to all Care Plus NJ employees and assists us in carrying out our daily activities within appropriate ethical and legal standards. These obligations apply to our relations with clients, affiliated doctors/therapists, third-party payers, subcontractors, independent contractors, vendors, consultants and one another.

While Care Plus NJ has expanded its services into other Counties, and seeks to continue this pattern of growth in the future, the policies set forth in the Corporate Compliance Program and this Code of Conduct must be followed by each and every employee.

You will find our Code of Conduct sets forth the Agency's basic principles of conducting business followed by a Question and Answer portion. The Questions and Answers contained in the Code serve as examples of situations, which may arise during the course of performing your duties. It in no way represents an exhaustive list of questions.

If you have any questions about the Code of Conduct or any Agency policy, it is your responsibility to seek out the appropriate management resource for the answer.

Remember to ask before you act.

¹ At times throughout the Code of Conduct Care Plus NJ will be referred to as "CPNJ".

² For purposes of the Code of Conduct the term Employee also encompass volunteers, students, per-diem employees, independent contractors and vendors.

How to Address Issues and Concerns

Care Plus NJ has experienced rapid growth over the past several years. We provide a multifaceted array of services to our clients and the community at large. For every aspect of our business there are complex laws and regulations, which govern how we operate. These laws and regulations may give rise to questions and concerns amongst our employees on how to handle various situations. That's why we require all employees to use the following mechanisms to find the answers they need.

1. If you are in doubt about an issue or have a concern, seek answers or advice. If the initial answer you receive does not appear to make reasonable sense, ask the question again. This may include posing the question to a member of management other than the individual who first answered the question.
 - a. As you contemplate a particular situation, consider the following factors which may help you arrive at the correct answer:
 - Is my action consistent with Care Plus NJ practices? Is the action legal?
 - Could my action give the appearance of impropriety?
 - Will the action bring discredit to any employee, Care Plus NJ or myself, if disclosed fully to the public?
 - Can I defend my action to my supervisor, other employees and to the general community at large?
 - Does my action meet the ethical practices of the Agency?
 - b. If you know the action you are taking (or about to take) is wrong, don't do it.
 - c. Remember to always use good judgement and common sense.
2. Follow the reporting process. Remember that it is always better to raise a question before action is taken. It is the policy of Care Plus NJ to ensure that no employee is penalized for raising an issue or concern. If a question arises:
 - Discuss the issue with your immediate supervisor. If you are uncomfortable bringing the issue to his/her attention, go to the next step.
 - Discuss the issue with the director of the program over the department where you work. If you are uncomfortable taking this step, go to the next step.
 - Discuss the issue with another company resource, such as (but not limited to) the Human Resources, member of the Executive Management Team or the Compliance Officer. Or go to the next step.

3. **Call the Care Plus NJ Compliance Hotline at 201-986-7749.**
4. **You can also email the Compliance Officer at compliance@careplusnj.org or <http://cpmail/cp>.**

Keep in mind the proper protocol for addressing employee questions and/or concerns are:

1. Speak to your immediate supervisor and/or director of the program you work for.
2. Seek out other members Care Plus NJ management (e.g. Member of the Executive Management Team, Human Resources, or the Corporate Compliance Officer) especially if you are uncomfortable or fearful of discussing the matter with your immediate supervisor or director.
3. Contact the Care Plus NJ Compliance Hotline, especially if you desire to remain anonymous.

The Care Plus NJ Compliance Hotline

Any employee may call the Care Plus NJ Compliance Hotline at **201-986-7749** to ask questions concerning potentially improper actions.

- Callers can report concerns anonymously and without fear of retribution or retaliation.
- Care Plus NJ makes no effort to trace the call. Calls are recorded only if the caller chooses to leave a message during particular hours of operation.
- The Compliance Hotline provides an additional method of communicating when an employee is uncomfortable using other channels of communication or needs additional assistance.

Operation of the Hotline

Any one wishing to utilize the Compliance Hotline will be able to call the number directly at any time. The caller will receive an automated message and directions to follow. When a call is received:

- The Compliance Officer will retrieve the message and return the call.
- The Compliance Officer will initiate an investigation of appropriate matters that cannot otherwise be resolved.
- The Compliance Officer will monitor the matter through to resolution.
- Callers will be given a compliance number so that they can call for an update at a later date.

Corporate Compliance Email

Employees also have the option of sending an email confidentially or anonymously. Only the Corporate Compliance Officer will have access to the email site.

To send a confidential email to the Corporate Compliance Officer log onto compliance@careplusnj.org. If you are sending the email from an Agency computer, your name will be revealed. If you are sending the email from outside of the Agency, your email address will be revealed.

To send anonymously log onto <http://cpmail/cp> and click onto Corporate Compliance, located under the Human Resource column. You will be given the option of sending the email anonymously, no identifiable information will be revealed.

The Corporate Compliance Officer will check the emails on a daily basis.

The same investigative procedures will be utilized as outlined above.

Corporate Compliance Department Investigation Response Guidelines

At Care Plus it is our policy to cooperate with any federal and state government investigation, inquiry or audit. The purpose of these guidelines is to give you clear instructions on how you are to conduct yourself during any visit announced or unannounced by a government entity.

ANY TIME YOU ARE CONTACTED BY A GOVERNMENT INVESTIGATOR OR AUDITOR:

- Be polite and courteous.
- Request identification and ask to see credentials.
- Ask the reason for the visit or inquiry.
- Ask the individual to wait in an unused office or a location where business is not conducted.
- **Immediately contact the Corporate Compliance Officer, or in his/her absence, contact a member of the Executive Management team.**
- **Remember:** Employees are free to speak to government investigators or auditors; however you are not required to submit to questioning. You have the right to decline an interview or postpone it until you have spoken to an attorney. Care Plus NJ cannot and will not forbid employees to speak to investigators. If you do speak to an investigator, remember to always tell the truth. You should also know you have the following rights:
 - a. **If you choose, have an attorney or someone else present as a witness.**
 - b. **Take notes, including questions asked and your responses.**
 - c. **To know the full identity of all persons who interview you (name, position, and agency)**
 - d. **To end the interview at any time without providing a reason.**
 - e. **To decline to answer a question.**

What to do if:

1. A government investigator requests documents from you:
 - Notify the Corporate Compliance Officer, a member of the Executive Management Team or designated outside Agency Counsel immediately.
 - Refer the Investigator to the Corporate Compliance Officer or designated outside Agency legal counsel.
 - Do not Release Documents if the investigator does not have a subpoena or search warrant.
2. A government investigator presents a subpoena for documents:

- Immediately fax a copy of the subpoena to the Care Plus NJ Central Office. Manager, Corporate Compliance Officer or designated outside Agency Counsel.
 - Do not turn over documents immediately. CPNJ will respond by the return date on the subpoena.
 - Do not make any statements regarding the documents requested.
 - Again, obtain the identity and credentials of the investigator serving the subpoena.
3. A government investigator serves you with a search warrant for documents and/or equipment:
- Immediately contact and fax a copy of the search warrant to the Care Plus NJ Central Office Manager, Corporate Compliance Officer or designated outside Agency Counsel.
 - Request that the investigator[s] wait for the Corporate Compliance Officer or designated outside Agency Counsel to arrive on site to begin collecting the documents. The investigators may, by law begin without waiting, but you should make the request anyway. In such cases always:
 - a. Determine the specific areas or locations the search warrant covers.
 - b. Escort the investigator to the areas where documents are kept.
 - c. Ensure that it is being executed during the hours indicated.
 - d. Ensure that it has not expired.
 - e. Ensure it is signed by a Judge.
 - Make copies and/or detailed list of everything taken.
 - Remember that the search warrant is only for documents. You are under no obligation to speak to the investigator. You may decline to speak to him/her on the advice of counsel.

SAVE THESE NUMBERS:

Corporate Compliance Officer- Brigitte D. Johnson, Esq.:
201-986-5010 or Ext. 218

Designated Agency Attorney- Elliot Urdang, Esq.:
201-567-0485

Designated Agency Attorney for PESP/ICMS- Scott Lippert, Esq.:
201-599-8400

Code of Conduct

Leadership Responsibilities

Management must set the tone for the Compliance Program.

While all Care Plus NJ ("CPNJ") employees are obligated to follow our Code of Conduct, we expect our management leaders to set the example, to be in every respect a model. They must ensure that those on their team or under their supervision have sufficient information to comply with laws, regulations and policies, and have sufficient resources to resolve ethical dilemmas. They must help to create a cultural environment within CPNJ, which promotes the highest standards of ethics and compliance. This cultural environment must encourage everyone in the organization to share concerns when they arise. We must never sacrifice ethical and compliance behavior in the pursuit of business objectives.

Questions and Answers

Q. As a member of the management team at CPNJ, I have always been on a “first name” basis with my staff. I have an “Open Door” policy, where staff can bring concerns or problems directly to my attention. Does the Compliance Policy do away with that level of informality?

A. Not at all. The “Open Door” policy and informal communications are still encouraged and in fact are needed by management to effectively operate the programs and services of the Agency. However, we realize that problems and concerns may arise of a more serious nature, especially those involving violations of the Code of Conduct, laws or regulations which govern how this Agency conducts its business. In such cases, there may be a violation, which could subject the Agency, employee or you, to civil or criminal liability. Therefore, it is extremely important that managers take the responsibility in reporting, and/or redirecting the employee to report, such matters to the Corporate Compliance Office, as soon as they arise. We will also look to management to encourage and promote the use of the Compliance Hotline amongst staff. The CPNJ management team will play a crucial role in the success of our Compliance program.

Q. As a manager, I am very concerned about potential abuse of the Compliance Hotline by disgruntled employees more concerned over shift assignments than a compliance violation. What safeguards will the Agency put in place to prevent abuse of the system?

A. The Agency will take great care to educate all employees on the proper use of the Compliance Hotline to prevent misuse of the system. All employees will understand that the hotline should be called to discuss concerns and to report possible violations related to:

- Patient Relations or Patient Care

- Confidentiality
- Coding and Billing
- Conflicts of Interest
- Business Courtesies
- Improper Payments and Referrals
- Antitrust Issues
- Financial Reporting
- Discrimination
- Workplace Safety
- Any other potential violation of laws, regulations, or third party payer requirements
- Any other issue or matter of a compliance-related nature

The Compliance Office will investigate every such call thoroughly before any action will be taken. We anticipate most calls will involve employees complaints/concerns regarding matters or issues related to the performance of their duties. In such cases, these calls will be directed to our Human Resource Department and the organizational policies for handling such concerns will govern.

Fair Treatment of Employees

Care Plus NJ sees its employees as its most important asset and greatest resource. All employees are to be treated with respect and dignity.

It is the responsibility of all members of the CPNJ system of care, to create and maintain a work environment in which employees are treated with respect, diversity is valued, and opportunities are provided for development. Harassment or abuse of any kind is prohibited in the CPNJ workplace. CPNJ also prohibits discrimination in any work-related decision on the bases of race, creed, gender, age, disability status, national origin, or any other illegal basis.

If a CPNJ employee ever perceives that inequitable or unfair conduct is occurring in the workplace, the employee should utilize the existing “grievance” or problem resolution process available within the Agency. (Employees should refer to their Employee Handbook for an outline of such procedures). If the employee feels that use of these resources does not resolve the matter, he or she may contact the Human Resource department, the Corporate Compliance Officer or the Compliance Hotline.

Q. I believe I was not selected for a promotion because of my age (or gender, national origin, color, disability status, etc).

A. You should try to discuss the situation with your immediate supervisor or director that did the actual hiring, to make sure you understand the qualifications needed for the

position. Ask your supervisor/director to identify the qualifications which he/she believed you did not meet or areas in which the selected candidate was considered better qualified. If you are not satisfied with your manager's explanation, contact the Human Resource department.

Q. I noticed that my supervisor has a relative that is working here at CPNJ in the same department. I've noticed an increase in the practice of hiring relatives over the past several months. I don't think that is right. What should I do?

A. CPNJ seeks to employ the most qualified individuals for any offered position. We encourage all employees to recommend qualified applicants for the job, including relatives. If a relative of an employee meets the employment qualifications of a position, he/she will be given the same consideration as any applicant. To address your initial concern, an employee can have a relative working in the same department, as long as the Human Resource Director approves the employment. However, there are stipulations to our policy on hiring relatives. For instance, an employee cannot have a relative as his/her supervisor, or conducting his/her performance evaluation, or investigating allegations of sexual harassment/discrimination against him/her, or approving the employee's performance/productivity bonus, merit or annual salary increases. If you believe the Agency's policy is not being followed or have questions about the employment of a relative within your department or the Agency, you should contact the Human Resource department.

Q. Our department recently hired a new manager. Since her arrival, I have been penalized for tardiness and absenteeism. There are employees in my department with worse records than mine and I don't see them being treated in this way. I am concerned it is because of my ethnicity (or national origin, gender, age, disability, etc.) What should I do?

A. CPNJ prohibits unequal treatment of employees if such treatment is based on bias or discrimination. Talk to your immediate supervisor, director or Vice-President of your department about your concerns. If you are uncomfortable approaching your supervisor or director or if you are not satisfied with his or her response, notify the Human Resource department. Provide examples of these incidents and state your concerns. Unequal or unfair treatment from one's supervisor, manager or director is an appropriate grievance, requiring management to look into your concerns.

Q. I recently observed a doctor (or therapist) where I work doing something I believe to be improper. I believe I should tell someone about this, but I do not want to be a snitch or get in trouble for upsetting one of our more prominent or senior members of the Agency's staff. How should I proceed?

A. Even if the doctor or therapist is a prominent senior member of our staff, you should raise your concerns through the appropriate channels. It is important for you to come forward with pertinent information related to any potential misconduct by any CPNJ employee or agent. If you are comfortable doing so, you may choose to discuss the situation with your immediate supervisor or the manager in charge of your area. If you

do not feel comfortable approaching your supervisor or manager, you should contact the Corporate Compliance Officer, Human Resource department or any member of the executive management team. You might also consider calling the Corporate Compliance Hotline. Situations involving medical staff should be reported through one of the mentioned reporting channels immediately or to the Vice-President of Sub-Acute Services (who oversees the Medical Services Department). Your duty to report also extends to situations that may involve your supervisor or any member of the Agency's management team. In such situations the employee should report it to the Corporate Compliance Officer or through the Compliance Hotline.

Q. My supervisor has secretly recorded conversations with his manager. This practice doesn't seem right to me, but what should I do?

A. No employee should record conversations without the express, written consent of the individual(s) being recorded. To do so without permission is a violation of the other person's right to privacy, as well as federal law. Notify either your supervisor's manager or the Corporate Compliance Officer.

Q. I know an employee who is occasionally offended by the language and inappropriate humor the supervisor uses when speaking with employees. What should I advise the employee to do?

A. CPNJ has a Non-Harassment Policy which all employees are required to adhere to. Advise the employee to tell his or her supervisor that he or she finds the language and humor offensive. If the employee is not satisfied with the results (or is uncomfortable speaking directly with his or her supervisor), then the employee should discuss the situation with the supervisor's manager, director or Vice-President of your department. You can also encourage the employee to go directly to the Human Resource department with his or her concerns.

Q. I am an employee at Care Plus and also a consumer. I participate in weekly management meetings with my supervisor and co-workers. I have a good working relationship with my co-workers. However, at times when the meeting turns to the discussion of clients, I often feel my co-workers use insensitive language to describe the clients and the effects of their illness. I am not sure how to handle the situation. What should I do?

A. CPNJ encourages, and in most cases requires, departments to hold management meetings. The management meetings provide a forum for your supervisor and co-workers to openly and freely discuss clients, treatment and managerial concerns. Your participation in these meetings may be included in your job description. At the very core of the management meetings are open communications between staff and supervisors. The ability to convey our thoughts and feelings helps us to better serve the clients. During these meetings staff have the right to express themselves (as long as the language is not vulgar or offensive pursuant to our Non-Harassment Policy). If you find the choice of words used by your co-workers to be insensitive, you should bring it to their attention

during the meetings. If you feel uncomfortable discussing it with your co-workers, bring your concerns to your supervisor, director or Vice-President of your department.

Patient Care

At the core of our Mission is our commitment to provide the highest quality of care to all of our clients.

We treat all clients with warmth, respect and dignity and provide care that is both necessary and appropriate. We have a strong commitment to the rights of each client in giving the best mental healthcare possible. Clients may expect to receive considerate and respectful care. We honor and respect their right to be informed and to be involved in the decision making process about their care. We make no distinction in the admission, transfer or discharge of clients or in the care we provide based on age, gender, disability, race, color, religion, or national origin.

Clinical care is based on identified patient healthcare needs, not on a client's ability to pay or the organization's economics. We go to great lengths to ensure that client care is appropriate and designed to meet the intended outcomes of his/her treatment plan.

We shall continue to seek new approaches to increase the quality of care delivered to our clients while ensuring that care is delivered in a cost-effective manner.

We observe all applicable standards of professional practice in all Care Plus NJ facilities and programs.

Compassion and care are part of our commitment to the communities we serve. We strive to provide mental healthcare education and promotion, as part of our effort to improve the quality of life of our patients and our communities.

Questions and Answers

Q. I am a clerical employee working in a clinical setting. I noticed a client was told by the doctor that samples of two different types of medications, would be given to him/her to try as a new treatment, however I noticed that only one of the medications ordered by the doctor were given to the client. When I mentioned this to the nurse, she seemed annoyed but said she would take care of it. Have I fulfilled my responsibility if I am still uncertain that appropriate follow-up has occurred?

A. If you remain uncertain that appropriate action has been taken, continue to pursue the issue. This will require tact, because you cannot assume that the nurse did not address your initial observation. If you are not comfortable asking what follow-up occurred, speak to your supervisor, director or Vice-President of your department and request that he or she follow-up for you. Remember, mistakes can occur in even the best mental healthcare agencies. Quality in client care requires vigilance from everyone involved.

Q. I observed a colleague yelling at a patient. While I know that this particular client can be difficult to handle (and at times uses obscenities when addressing the staff), the

response of my colleague seemed inappropriate. The entire incident was disturbing to watch. What should I do?

A. At CPNJ both clients and staff have the right to be mutually respected. Although we realize our clients can be difficult at times, we must understand that they are ill and we are the professionals. The clients are our customers. While some clients are prone to yelling and using abusive language, all employees must observe professional boundaries, and not resort to the same behaviors of the clients. Therefore, responding harshly to a client will not be tolerated. It is our duty to handle clients in a professional manner at all times. The incident should be reported immediately to your supervisor. If you are not satisfied with his/her response, go to the director or Vice-President of your department. You may also report the incident to Human Resources, the Agency's Ombudsman, the Corporate Compliance Office or any member of the executive management team. Patient's rights must and shall be respected.

Ethical Business Practices

Truthfulness, honesty and integrity will govern in all business decision making.

Conduct business with honesty, fairness and integrity. These qualities are demonstrated through truthfulness, the absence of deception or fraud, and respect of the laws applicable to our business. It is the responsibility of every member of the CPNJ system, irrespective of facility location or job to act with integrity.

Questions and Answers

Q. I believe that our competitors are providing illegal inducements to doctors and therapists thereby hindering our ability to compete. What should I do?

A. Improper behavior by a competitor does not justify similar behavior on our part. Notify your supervisor of this situation, providing him or her with all facts available to you. It is your supervisor's responsibility to notify the Corporate Compliance Officer and/or a member of the executive management team so that CPNJ can take appropriate action.

Q. My supervisor directed me to do something that I believe is against CPNJ policies and perhaps, the law. I don't want to do something improper, but I'm afraid that if I don't do as I am told, I may lose my job. What should I do?

A. Consider discussing the request with your supervisor to be sure you understand the facts and that he or she is aware of your concern. If you cannot comfortably discuss the situation with your supervisor or cannot resolve your concern at this level, approach a member of the Executive Management Team or contact the Corporate Compliance Officer. You may also call the Compliance Hotline. Do not risk your job or the organization's future by taking part in an improper activity. There are appropriate actions you can take. CPNJ strictly prohibits retaliation against employees who raise such concerns honestly and forthrightly.

Q. If I suspect that a fellow CPNJ employee is violating an agency policy or the law, whom should I contact?

A. The ability of CPNJ to uphold its ethical and legal standards and responsibilities depends on employees taking action if they believe a violation is occurring. If possible, start with your supervisor and explain the issue to her or him. If you don't get the issue resolved at this level or if you feel uncomfortable raising the issue at that level, contact a member of the Executive Management Team or the Corporate Compliance Officer. Continue this process until you get an answer that appears to be legitimate and appropriate. If you are uncomfortable discussing the issue with someone at your location, or wish to remain anonymous, contact the Corporate Compliance Officer or call the Compliance Hotline.

Q. One of the JCAHO surveyors is an old friend of mine from our days in college. I joined CPNJ and my friend became a surveyor. During our agency survey, I invited my friend (the surveyor) to have dinner with me later that evening. We both avoided discussing the survey. Someone from the agency saw us and I began to feel uncomfortable. Was the dinner invitation acceptable?

A. Our ethical standards require that we avoid even the appearance of impropriety. Discuss the situation with your friend and avoid socializing with him or her until well after the survey has been completed and the survey recommendations are submitted to the Agency.

Billing Practices

Ensure that bills are accurate and honest at all times.

We take great care to assure all billings to government payers, commercial insurance payers and clients are true and accurate and comply with all pertinent Federal and State laws and regulations. We prohibit any employee or agent of CPNJ from knowingly presenting or causing to be presented claims for payment or approval, which are false, fictitious, or fraudulent.

We will operate oversight systems designed to verify claims are submitted only for services actually provided and services are billed as provided. These systems will emphasize the critical nature of complete and accurate documentation of services provided. As part of our documentation effort, we will maintain current and accurate medical records. Substantiating medical documentation must be provided for all services rendered.

CPNJ will always bill based on the principle that if the appropriate documentation has not been provided, the service has not been rendered. Medical records may be amended to correct an error or complete documentation only in accordance with established medical records procedures-not for the purpose of covering up errors or obtaining any payment to which we are not entitled. Medical records may not be erased or altered.

Billing data must be retained at least for periods described by law and CPNJ's (and its affiliates') policies that may require a longer period of retention in some cases. Clinical, administrative, or clerical staff involved in the preparation and/or submission of charge or billing data must be trained in coding and documentation practices. Billing policies and procedures must be written, approved by management, and appropriately updated. These policies and procedures must be available to all employees involved in the creation of charge or billing data.

When any payer agreement requires the collection of co-payments and/or deductible amounts, these amounts will be collected to the full extent of the agreement. Decisions to waive any co-payment or deductible must be disclosed and implemented in accordance with written Agency policy. Employees who suspect that improper billing or documentation is occurring should immediately alert their supervisor, the Chief Financial Officer, the Corporate Compliance Officer or a member of the Executive Management Team. Additionally, any employee may call the CPNJ Corporate Hotline if the issue remains a concern.

Any subcontractors engaged to perform billing, coding or auditing services must have the necessary skills, quality control processes, systems, and appropriate procedures to ensure all billings for government and commercial insurance programs are accurate and complete. CPNJ prefers to contract with such entities that have adopted their own ethics and compliance programs. Third-party billing entities, contractors and preferred vendors under contract consideration must be approved consistent with the Agency's organizational policies and procedures on the subject.

Questions and Answers

Q. Clients call our billing department or Front Desk personnel asking what diagnosis the doctor used for a visit. How can I tell a client that I am not allowed to discuss this information without annoying the client and causing a customer service complaint?

A. Tell the client, "I would like to be able to help you, but all medical information must come from a clinical area so that clients are not provided with misinformation". Tell the client you will forward the message to the appropriate department for assistance. The main idea is to always first affirm that you would like to help, but you are not authorized to provide the assistance or information.

Q. Doctors/therapists often call the billing department to correct or change a diagnosis in response to a client complaint about claim reimbursement. Should providers or their employees call to correct or change information related to patient accounts?

A. No. The provider who submitted the original information should only make corrections to medical information in writing. Additionally, all changes to claim information must be supported by medical record documentation.

Q. Clients call doctors/therapists and ask them to change their medical information to obtain better insurance reimbursement. When a doctor/therapist requests that the billing department (or Front Desk) make these changes is this appropriate?

A. It is only appropriate to make changes if the changes are legitimate corrections and the medical record documentation supports the requested changes. If you are uncertain whether the change you are being asked to make is legitimate, have the client's medical record reviewed by your supervisor or the Vice President of Sub-Acute Services (who oversees the Medical Services Department) along with the Chief Financial Officer before making any changes.

Accuracy of Records

Prepare and maintain all patient and company records accurately and retain such records for periods prescribed by law and CPNJ organizational policies and procedures.

Each CPNJ employee is responsible for the integrity and accuracy of our Agency's documents and records, not only to comply with regulatory and legal requirements, but also to ensure records are available to support our business practices and actions. No one may alter or falsify information on any record or document.

Medical and business documents and records are retained in accordance with the law and our Record Retention policy. Medical and business documents include paper documents, such as letters and memos, charts, computer-based information such as e-mail or computer files on disk or tape and any other medium that contains information about the organizations or its business activities. It is important to retain and destroy records only according to our policy. You must not tamper with records, nor remove or destroy them prior to the specified date.

Company books and records will not contain false or misleading information. Financial transactions should be recorded in accordance with generally accepted accounting principles and CPNJ organizational policies and procedures.

Questions and Answers

Q. I work in the billing department and have an accounting background. A senior manager told me how to record a transaction, but the instructions were not in compliance with generally accepted accounting principles or CPNJ organizational guidelines. What do I do?

A. Try to explain the accounting requirements to the manager and the reason the transaction cannot be recorded as he or she has instructed. If you are unable to resolve the situation with this manager, contact the Chief Financial Officer for the Agency, and the Corporate Compliance Officer, or call the Compliance Hotline.

Q. I work in the billing department. I happened to review a draft of an official statement that was being finalized and I noticed that some of the financial data was incorrect. Should I assume someone else will catch this mistake or should I report the error?

A. Immediately bring this information to your supervisor's attention. If an official statement is published with incorrect information, there can be serious consequences for

the Agency and those in charge of preparing the document. You can also bring the matter to the attention of the Chief Financial Officer or the Corporate Compliance Officer.

Q. I just received a pay increase. My supervisor told me my new rate would be \$12 per hour, but the first paycheck after the raise was effective reflects a \$21 per hour rate. What should I do?

A. Contact your supervisor immediately. Your supervisor will work with payroll and Human Resources to determine what happened and ensure you are paid at the appropriate rate.

Q. I work in a program, which has an overnight shift. A fellow employee, who works the shift before mine, habitually forgets to document important client activity (i.e. reaction to new medications or other unusual behavior). I am constantly being told important information, long after her/his shift has ended. What should I do?

A. It is important for all employees to provide the appropriate documentation of client activity, as directed by their particular program guidelines. If this is a habitual problem, you should report your concerns to your immediate supervisor. If you are not satisfied with his/her response or feel you can not bring the problem to his/her attention, you should contact Human Resource or call the Compliance Hotline.

Q. I am a case manager/mental health worker with the Agency. This week we had a number of client related emergencies in my department. I fell behind in writing my progress notes for several clients. Can I take the charts home to bring the progress notes up to date?

A. No. Client information is protected under both state and federal statutes and is deemed privileged and confidential. The client's medical records should never be removed from the premises unless approved by the Medical Director or a member of the Executive Management Team (and even then only under the most extraordinary of circumstances). We understand that patient emergencies must be addressed immediately, but documentation for all clients must be completed in a timely manner. Each department has its own guidelines and timeframes for file documentation. If you are having problems with scheduling time for any reason, it is your responsibility to consult with your supervisor to find the appropriate solution. If you feel your supervisor is not allowing for time to complete the documentation, then contact Human Resources.

Confidentiality of Information

Protect the confidential and proprietary information, including client information. Observe copyrights, trademarks, and/or licenses. Safeguard the intellectual property of CPNJ, its affiliates, and those with whom we do business. Never disclose confidential patient information to any unauthorized person.

One of the most valuable tools we have in providing client care is the information we receive from the client about his or her medical history and current condition. This

information is confidential and must be protected from disclosure. Disclosure of this type of information may violate an individual's rights to privacy and may expose both CPNJ and the individual involved to both civil and monetary penalties. Subject to only emergency exceptions clients can expect their privacy will be protected and client specific information will be released only to persons authorized by law or by the client's written consent.

Therefore, the following shall be deemed confidential:

- Information obtained, developed, or produced by CPNJ and its employees.
- Information supplied by outside consultants or vendors for the benefit of CPNJ.
- Information about CPNJ customers.

The above information should not be disclosed to anyone outside of CPNJ, including friends, family, relatives, business or social acquaintances, customers, suppliers, or others. Unless you have specific authorization, do not disclose this information to other CPNJ employees except on a "need to know" basis and with agreement of recipient to treat the information as confidential.

Those of you whose jobs expose you to confidential medical information must maintain the confidentiality of that information. It is important, therefore, not to discuss confidential information in public areas or to release such information without the appropriate consent. You should also be careful not to leave confidential information in areas where it may be viewed by unauthorized persons. Computer passwords should not be shared with anyone in order to protect computerized medical recourse. Employees should log off computer terminals when their work is complete or whenever, taking extended breaks away from the workstation.

CPNJ and its affiliates will take reasonable steps to prevent copying or unauthorized use of copyrighted or licensed materials and to ensure that all propriety information entrusted to the Agency is safeguarded.

Questions and Answers

Q. Who has access to my personnel records and wage information?

A. Personnel records and wage information are confidential. Access to personnel files is limited to representatives of management and Human Resources who need access to these records. Upon request, you have the right to review your personnel records.

Q. Occasionally, the Front Desk and Access departments receives calls from clients wanting copies of their medical records. Can we provide this information?

A. Generally, clients are entitled to receive copies or summaries of their records (exceptions exist when the request is from a minor or depending on the severity of the client's mental illness). It has been the Agency's practice to have the client put their

request for records in writing, and to set an appointment so that the records can be reviewed with the therapist, then provided a copy. If there is a question, get advice from your supervisor, director or Vice-President of your department or the Corporate Compliance Office before releasing medical record information. Staff may also consult with the Medical Records Consultant or the Agency attorney in his/her absence.

Q. I received a call from a former CPNJ employee's new employer asking questions about the employee's performance while at CPNJ. Should I give out this information?

A. No. Information concerning employee performance is confidential. Questions regarding an employee's performance or requests for Professional References should be forwarded to the Human Resources department for a response.

Q. I have a client who has been arrested. I received a call from a person identifying himself/herself as the lawyer representing the client. He/She wants to know more about the nature of the client's illness and the treatment plan. This information will be used to defend our client. Should I give out this information?

A. Many of our clients have legal matters and retain (or are assigned) legal representation. Often, the client discloses the nature of his/her treatment with legal counsel. You must inform the attorney that you can not give out any information regarding the client (not even to confirm that he/she is a patient at CPNJ) without the express, written consent of the client. You should confirm the information with your client and have him/her sign the CPNJ Release of Information form. The form must specifically authorize you to speak to his/her attorney. The name of the person to receive the information, along with the specific information to be released must be clearly printed on the form. The form should be signed, dated and witnessed. If you have questions or feel pressured by counsel, direct the call to your supervisor. You can also call the Corporate Compliance Officer or if applicable, the designated outside counsel assigned to your department.

Q. I am a case manager. I have a client who does not wish to have his/her family involved in his/her treatment. The client has specifically instructed me not to talk to any family member, if they should call to check on his/her progress. In my professional opinion, I think the patient could benefit from family involvement. What should I do?

A. While you may be correct in thinking that the client could benefit from family involvement, you must respect and honor the wishes of the client. However, you may continue working with the client to help him/her understand the benefits of family involvement. Nevertheless, the client must provide written consent, giving you permission to discuss his/her treatment with family. Until such permission is given, you cannot involve the family. You should bring your concerns to your supervisor and discuss this matter.

Q. Sometimes there is insufficient budget for a software package I need on my computer. Can I copy the software from another CPNJ computer as a temporary measure, as long as I delete it later?

A. Copying software often violates copyright laws or licensing agreements. Illegally copying software is not acceptable under any circumstances. Unless CPNJ has been granted specific permission by the software creator or seller, a program should not be loaded onto more than one personal computer at time. For every workstation, a multi-user system, or mainframe that contains a program, a separately purchased software license is required. Installing freeware or shareware or software from a home computer also violates CPNJ policy unless you have obtained specific approval to do so from the Director of Information Management (IM) directly. Consult with the IM Department before installing or copying software on any CPNJ computer.

Q. A coworker who developed training materials (software program, audit process, etc) for CPNJ is marketing those materials on his/her own time to other companies. He intends to keep the proceeds for his own use. Is this ethical?

A. Generally CPNJ owns all proprietary information including “intellectual property” (computer programs, training materials, processes, or marketing strategies) created by employees while on the job or while using CPNJ resources. This is a complex area and you should raise this issue with your supervisor, who may discuss it with the Director of IM or a member of the Executive Management Team. CPNJ's propriety information may not be used for personal gain.

Government Investigations

Cooperate with legitimate government investigations. Government investigations are a fact of life in today's health care environment and procedures for cooperating with these investigations have been developed by CPNJ. If you become aware of an investigation, immediately seek guidance from the CPNJ Corporate Compliance Office.

If a CPNJ employee is approached by any person who identifies himself or herself as a government investigator, the employee should contact the Corporate Compliance Officer or the designed outside counsel for that department immediately. When calling the Corporate Compliance Officer or designated outside counsel, notify the person taking the call that you are calling concerning a potential government investigation. The Corporate Compliance Officer or designated outside counsel will assist in verifying the credentials of the investigator, determining the legitimacy of the investigation and following proper procedures for cooperating with the investigation. In the absence of the Corporate Compliance Officer or designated outside counsel, the CPNJ President/CEO or member of the Executive Management team should be notified immediately, and they will assist in cooperating with the investigation as stated above.

In some cases, government investigators, or person presenting themselves as government investigators, may contact employees outside of the workplace, during non-work hours, or at home. Do not feel pressured to talk with the person under such circumstances

without first contacting the Corporate Compliance Officer, designated outside counsel or your personal attorney. It is the legal right of employees to contact legal counsel before responding to questions by an investigator.

CPNJ employees must never:

- Destroy or alter any company document or record in anticipation of a request for the document or record by a government agency or court.
- Lie or make false or misleading statements to any government investigator.
- Attempt to persuade another Agency employee, or any other person, to provide false or misleading information to a government investigator or to fail to cooperate with a government investigation.

Should a CPNJ employee receive a subpoena or other written request for information (such as a Civil Investigation Demand regarding CPNJ), the employee should contact the Corporate Compliance Officer, the CEO or Senior VP of Acute Services immediately, before responding to the request.

Questions and Answers

Q. The local prosecutor's office called and asked me to give a statement regarding CPNJ's treatment of a particular client. Should I respond?

A. We have a responsibility to protect client confidentiality. Do not provide confidential client information to the person who identifies himself or herself as being an attorney with the prosecutor's office, until you have spoken with the Corporate Compliance Officer or the designated outside counsel assigned to your department.

Q. What should I do if a FBI agent comes to my home and asks to talk to me about the activities of my department?

A. CPNJ cannot prohibit you from talking to a government investigator if you wish to do so. However, we encourage you to consult with the Corporate Compliance Officer, designated outside counsel for your department or your own personal attorney before answering any questions. Asking to speak with legal counsel or anyone else before answering questions is your right and in no way indicates that you are not cooperating fully. You have the right to reschedule the interview.

Q. At times we have other representatives from State agencies that come to our site unannounced. They look around and ask questions about our department. Should I give out any information?

A. Periodically, representatives from State and local agencies come to CPNJ for site visits and reviews. Many times these site visits are announced, but depending on the funding stream it may be unannounced (e.g. spot Medicaid review of Partial Hospitalization). Any time a representative comes to your department, be polite and

courteous and ask for proper identification of the individual. You should also notify your supervisor, director or Vice-President of your department immediately of his/her arrival, before discussing any department or patient information. It would not be inappropriate to ask the representative to wait in the lobby of your site, until your supervisor or the director of the department can be contacted.

Special Legal Responsibilities

Antitrust-

It is the policy of CPNJ to only compete fairly and in compliance with all applicable antitrust laws.

Antitrust laws are designed to create a level playing field in the marketplace and to promote fair competition. We compete with other mental healthcare providers and other agencies in many of the communities in which we operate. Each of us must be committed to competing vigorously on behalf of CPNJ and its affiliates. But we draw a line between competing vigorously and competing unfairly, and we must never cross that line.

We will not enter into agreements or take actions, which restrain trade or reduce fair competition.

It is unlawful to agree, or to attempt to agree with competitors to fix prices, divide geographic markets, make any agreement that raise the price of our services, improperly reduces competition or otherwise act to restrain trade or reduce fair competition. Take particular care when pursuing joint ventures or alliances with other mental healthcare providers.

Those of you who have dealings with customers and suppliers, may face significant antitrust issues, particularly in geographic regions in which CPNJ has a considerable market position. You should be aware of situations that may present antitrust issues.

Seek advice from your supervisor or manager before taking any action that may compromise fair competition or compliance with anti-trust laws. Those supervisors and managers who are informed of potential antitrust issues should immediately contact the Corporate Compliance office. Advice from designated legal counsel should be sought when appropriate.

Questions and Answers

Q. I have a friend in the managed care department of one of our competitors. Her company has asked her to survey mental healthcare agencies prices in the region. Can I give her copies of price lists and bids?

A. No. Any sharing with competitors of pricing information not normally available to the public could be perceived as, or be legally treated as, an effort to fix fees or limit competition. Never disclose our pricing or charge information to competitors without seeking an opinion from executive management and/or designated outside legal counsel.

Q. I sometimes attend trade shows or professional meetings at which I run into old friends who work for competitors of CPNJ. Are there subjects that I should avoid?

A. Avoid anything that affects competition in the marketplace, including prices, pricing policy, profit margins, cost structures, or credit and billing practices. Trade shows, professional meetings, and other gathering pose problems when competitors “talk shop”. The most serious problems often arise in informal gathers (e.g. lunch or dinner after the meeting has concluded). Stay away from any business discussions with competitors.

Q. A manager is participating in the development of the system-wide information systems strategic plan. He realized that an outside company, XYZ Information Systems, is likely to become a strategic partner with CPNJ. XYZ Information System’s stock performance has been strong and the manager decides to buy 100 shares as a personal investment. Is this acceptable?

A. The manager should review the CPNJ Conflict of Interest Policy. However, there would be no violation of the law or CPNJ policy if:

- XYZ Information Systems is a large publicly traded corporation.
- The CPNJ relationship will not have a material effect on the price of the stock. and
- The manager has purchased only a modest number of shares that do not represent a material voting block to influence XYZ Information Systems.

Marketing

Only promise what we can reasonably expect to deliver and only provide a quality service. Represent CPNJ and its affiliates fairly and honestly, stressing their value and our capabilities of our services and/products.

CPNJ will use marketing and advertising activities to educate the public, provide information to the community, increase awareness of our services, and to recruit colleagues.

We will present only truthful, fully informative and non-deceptive information in these material and announcements. All marketing materials will reflect services available and the level of licensure, certification and/or accreditation. Advertising should not exploit customer or patient fears as a key-motivating factor.

Questions and Answers

Q. A recent government report ranked mental healthcare providers for their care of patients. Our facilities ranked high and our competitor ranked low. Should we inform the public of this information?

A. We may certainly include reference to a good rating of our performance when discussing CPNJ and its services in advertising and informational materials. In doing so we would evaluate whether we consider the reporting agency a reliable source and what would we be saying about the report if our ranking had been lower. Direct comparisons of our ranking with competitors, while tempting, should not be the focus of our advertising. We should discuss our success without reference to competitor's performance.

Conflicts of Interest

Conflicts of interest are to be avoided at all cost.

Outside Interests-

Many employees have business interest and or other jobs outside of CPNJ. Employees may also be involved with outside activities or personal interests, which are not apart of your duties as an employee of CPNJ. If you are one of those employees, you must ensure that your responsibility to CPNJ and your personal interest remain separate.

A conflict of interest may occur if your outside activities or personal interests influence or appear to influence your ability to make objective decisions in the course of your job responsibilities at CPNJ. A conflict of interest may also exist if the demands of any outside activities hinder or distract you from the performance of your job or cause you to use CPNJ resources for other than CPNJ purposes. Your spouse or another family member may also have an interest that might force you to choose between their interests and the interests of CPNJ.

It is your obligation to ensure you remain free of conflicts of interest in the performance of your responsibilities at CPNJ. It is the employee's responsibility to disclose such conflicts of interest immediately. If you have any questions about whether an outside activity might constitute a conflict of interest, you must obtain the approval of your supervisor before pursuing the activity.

Gifts & Business Courtesies-

Giving and accepting gifts in the course of doing business can sometimes be interpreted as an attempt to influence the decision-making process. Therefore the acceptance of gifts and gratuities from any vendor by any employee (or the employee's family) of CPNJ is prohibited. If a CPNJ employee receives any substantial gift or favor, he or she must return it and notify his or her supervisor immediately. Employees may, however give or accept gifts of small value as tokens of respect or friendship, as long as he/she has administrative approval (e.g. sales promotion items or occasional business-related meals or entertainment of modest value).

In no case should a CPNJ employee accept a gift or consideration of more than nominal value or any cash payment from a patient.

CPNJ will not process or negotiate personal purchases for employees or any member of the Medical Staff. CPNJ will not purchase any goods or services from any employee without administrative approval.

A CPNJ employee should not offer or give any gift or any consideration of value that may appear to be intended to influence the objective judgment of anyone outside the Agency. As a rule of thumb, if you cannot accept a gift or consideration with CPNJ guidelines, do not offer it.

You can also contact the Human Resource department or the Corporate Compliance Office, if questions remain about the activity, so that CPNJ may decide whether an actual conflict exists.

Questions and Answers

Q. I am a doctor/therapist here at CPNJ. I wish to maintain my own private practice and see clients. Can I do this?

A. Yes, with conditions. All employees are expected to devote their full attention, effort and energy to their jobs here at CPNJ. Therefore, CPNJ discourages employees from performing work for other employers or engaging in self-employment where the outside work may be detrimental to the work at the agency. We also expect that you will not solicit any of our CPNJ clients who were served by or became known to you during your association with CPNJ, in your private practice, unless approved by Executive management. We would prefer that you not maintain a private practice within the towns served by CPNJ. In addition, if you have a written contract with CPNJ you should review the contract since it may address these issues in greater detail. If questions still remain about maintaining a private practice, contact the Corporate Compliance Officer.

Q. I am a doctor/therapist and will be resigning from my position here at CPNJ. I intend to join a physician's group and practice privately. I have established close therapeutic relationships with several of my CPNJ patients. Am I allowed to continue my treatment of these patients, if the patient wishes to follow me to my new practice?

A. Patients have the right to choose their own therapist. Therefore, if a patient wishes to follow you, that is their legal choice. However, CPNJ requires you, for a period of one year, to refrain from soliciting any of our clients or marketing your private services to the client as a way of enticing them to leave. If you feel your departure from the Agency will be emotionally difficult for your clients or if you have questions about the Agency policy, consult with your supervisor, director or the Vice-President of your department.

Q. I have an outside business selling cleaning products. Can I use the Agency's bulletin Boards or inter-office mail to advertise these products to other CPNJ employees?

A. No. Products and services not offered by CPNJ and its affiliates should not be promoted during working hours or on CPNJ property. Neither should you use CPNJ's name, its facilities, or resources (e.g., telephones, fax machines, etc. or your work time)

to sell non-CPNJ services or products. However, you are free to engage in an outside business that does not pose a conflict of interest with CPNJ on your own time and off company premises.

Q. I am a caseworker here at CPNJ. I have a client that is moving into her own apartment and needs help. I know that CPNJ has client assistance funds that will assist with hiring movers. The client has asked me to assist her with finding a mover, as well filling out the agency application for financial assistance. My husband owns a moving business, can I hire him for the job?

A. CPNJ prohibits business dealings between clients and employees or their relatives/friends. At all times we ask employees to ensure that client care and business activities are conducted in an objective manner and not be motivated by a desire for personal or financial gain. Since the person providing the service to the client is a relative, you have a personal and financial interest in the transaction. Also, the situation could put you in a compromising position, should the client be dissatisfied with the services provided. While your husband may be able to provide adequate services, it would be a breach of our Conflict of Interest policy and should be avoided. If you have any questions, contact your immediate supervisor or you can contact the Corporate Compliance Office.

Q. I heard CPNJ is interested in purchasing a new copy machine from a new vendor. My brother's company sells copy machines. Would it be a conflict of interest if I recommended my brother's company?

A. Generally, we are required by law to avoid contracting for goods or services with family members of employees. Do not take any action that may create the impression that you are attempting to influence a CPNJ purchasing decision in favor of a family member. If you have questions, you can contact the Corporate Compliance Office.

Q. My position at CPNJ requires that I travel. Many airlines, hotels and rental car companies have frequent traveler programs through which I can receive free trips, care rentals, or hotel stays for my personal use. Does CPNJ allow me to accumulate these points for CPNJ travel?

A. Yes, you may use these credits, as long as you are aware of certain responsibilities. You must be sure you haven't cost CPNJ additional expenses by scheduling a particular routing, carrier, or trip simply to pursue those credits. The trip should be clearly necessary and use the most cost-effective carrier, routing, and services. Employees should be able to clearly explain their choices of timing, routing, location and carrier.

Q. In appreciation for our business, suppliers to CPNJ occasionally invite me out to dinner or offer tickets to sporting events. Is it acceptable for me to go?

A. You may accept these types of invitations on occasion, if they are within the bounds of the law, good taste, moderation and common sense. Your activities must be acceptable according to company policy, but also avoid creating an appearance of impropriety. CPNJ's Corporate Compliance Policy and Agency Policy prohibits you

from accepting an invitation with a value more than \$50. If you have a question about the invitation or offer, consult your supervisor or the Corporate Compliance Office.

Q. If I have been asked to speak at a conference and an honorarium is given to me for my efforts, is that honorarium mine or does it belong to CPNJ?

A. Many of our CPNJ employees have a high level of expertise in various areas of practice. Therefore, it is expected that on occasion, members of our staff will be invited to speak at different events and/or conferences. Such activities are strongly encouraged. CPNJ is proud of our staff and believe that the exposure can be a positive reflection on the Agency. As a rule, if you are being asked to speak in your role as an employee of CPNJ, and if your trip or other arrangements are sponsored by CPNJ, then the honorarium should be paid to the Agency. However, if your speaking engagement is unrelated to your employment or role (past or present) with CPNJ, if you are preparing and presenting without use of CPNJ resources, and if you are using vacation or leave time to make the arrangements and to prepare for and the presentation, then the honorarium is most likely your personal property. Because this involves a judgment call, in such a situation, ask the VP of your department or consult with the Corporate Compliance Officer, before accepting the engagement to determine who should receive the honorarium.

Improper Use of Funds

CPNJ funds may not be used for improper or illegal activities such as payments to doctors or therapists to induce referrals or for political payments.

CPNJ and its affiliates prohibit any payment that may be viewed as a bribe, kickback, or inducement. A “bribe” or “kickback” is any payment or consideration of value offered with the intent to influence a decision on grounds not directly related to its business merits. Payments or consideration of value given to doctors, therapists or other parties to influence the flow of referrals to CPNJ are inducements and are strictly prohibited. Prohibited inducements include gifts of more than nominal value, excessive entertainment, or other considerations given to government employees, doctors, or other parties who are in a position to influence patient referrals.

You cannot use company funds to contribute to a political party, committee, organization, or candidate concerning a federal campaign. You may, of course, make personal contributions of your own funds to the campaigns of candidates of your own choice. Such contributions are not reimbursable by the company.

Questions and Answers

Q. What should I do if a doctor/therapist asks me to provide payment or compensation in exchange for referrals to my facility?

A. Such a request is against our principles and may be illegal. Discuss the situation immediately with your supervisor, the VP of the department, or any member of the Executive management team. You can also call the Compliance Hotline. Any supervisor

or executive management member, who learns of such an incident, should report it to the Corporate Compliance Officer or call the Compliance Hotline.

Q. I work in the payroll/accounts payable department and every month I process a check for a particular employee. Recently, I learned from a friend (co-worker) that this particular employee never performs services to which he/she is getting paid. What should I do?

A. At this point, you can not be sure whether or not your friend has the right information. Therefore, it is important that when encountering a questionable circumstance such as this, bring this information to the attention of your supervisor, or directly to the Chief Financial Officer. You can also contact the Corporate Compliance Officer or the Compliance Hotline.

Healthy, Safety, and Environmental Concerns

Provide a safe and healthy workplace in which applicable health, environmental and safety laws/regulations are observed.

It is the policy of CPNJ to comply with all applicable workplace health, safety and environmental laws and regulations as they relate to our Agency's operations. We will comply with all environmental laws and operate each of our sites with the necessary permits, approvals and controls. We diligently employ the proper procedures with respect to handling and disposal of hazardous and biohazardous waste, include but not limited to medical waste.

All employees are expected to handle materials according to established control, storage and disposal procedures. If you do not know the correct procedure for handling or disposing of a particular material, promptly ask your supervisor, or the Facilities Management department. All employees are expected to abide by our Universal Precautions policies.

Questions and Answers

Q. I heard that there was a break out in one of our residential facilities of a disease, which, while not fatal could be contagious. The same clients attend other services at the Agency during the day. Shouldn't that be told all CPNJ employees?

A. When such an incident occurs, the staff for the department, the VPs of Acute and Sub-Acute Services, along with our Environment of Care Committee are notified immediately. An action plan is developed amongst the key medical and environment staff. Those clients who may be contagious are not allowed to attend groups at the Agency until they are no longer at risk of infection to others. Depending on the nature of the disease, it is our policy not to frighten all employees. The employees for the particular departments who could be affected are notified and treatment is provided, if necessary. However, if in fact the disease were more serious, the Executive management team would issue the proper warnings to all employees. In all such cases the appropriate authorities are notified. If you hear of an incident and wish to discuss the

effects, you can consult with the Vice President of Sub-Acute Services or the Chair of the Environment of Care Committee. If you are not satisfied with the response contact the Corporate Compliance Officer or call the Compliance Hotline.

Protecting CPNJ Assets

Use company property and other CPNJ assets for business purposes only.

All property, equipment and funds of CPNJ are entrusted to the care and use of its employees and remain the property of the Agency. All such persons are responsible for exercising reasonable care in their use. Those who fail to exercise reasonable care in safeguarding CPNJ's equipment, property or cash may be held liable for its loss, theft or damage.

CPNJ property is made available to employees for only authorized CPNJ business purposes and should not be used for personal reasons. This applies to physical assets such as Agency vehicles, cell phones/beepers (distributed by the Agency for the particular job duties), office equipment, computers, software, medical and general, as well as other types of property such as company records, patient information, and customer lists. CPNJ property must not be removed from the Agency's facilities, unless it is necessary to do so to perform your job although client records should never be removed without permission of Executive Management and, even then, only on extremely rare occasions. If removed from the Agency's facilities, you must promptly return the property to the facility when it is no longer needed off-site for business purposes.

All CPNJ employees are expected to maintain and properly care for Agency property.

Questions and Answers

Q. If I see an employee intentionally misusing or damaging Agency property, what should I do?

A. All employees have an obligation to treat CPNJ property and equipment with care and respect. This includes reporting any damage or malfunction of Agency property to appropriate CPNJ personnel. If you are aware of anyone intentionally or negligently damaging Agency property or equipment, report your observations to your supervisor or manager, who will investigate the matter and take appropriate action. You can also report your observations to the Facilities Manager or call the Compliance Hotline.

Q. I have seen several employees using their agency issued cell phones to make and receive personal calls. I observed one employee on the phone for over an hour with a personal call. What should I do?

A. Cell phones and beepers are considered agency equipment (in the same way as our copy machines, faxes, cars, etc). Cell phones and beepers are issued to various personnel to better assist them in doing their job. Care Plus NJ prohibits the use of agency equipment for personal use. When such use occurs, the user will be billed for the use,

payable ten days from usage (misuse should cease at that point.) If misuse continues, the Agency reserves the right to take disciplinary action. If you suspect that an agency issued cell phone or any equipment is being used for personal rather than business purposes, you should contact the Facilities Manager or call the Compliance Hotline to report your concerns.

Q. I have seen one of my co-workers logging onto to different websites on the Internet, which do not appear to be work related. Sometimes, I find the material to be offensive. What should I do?

Care Plus encourages the use of electronic communication and associated services (e.g. computers, e-mail, telephones, fax machines, external electronic bulletin boards, on-line services, the Internet and World Wide Web) because it is believed that they make communication more efficient and effective, and because they are valuable sources of information. However, electronic media and services provided by CPNJ are to facilitate CPNJ business. Using the Internet or downloading programs for personal, non-related business purposes is prohibited and violates our Electronic Communication Policy. Our policy specifically addresses misuse of the electronic media for materials that are obscene or x-rated in nature. In addition, downloading materials or using the computer for non-related business purposes effects the overall CPNJ computer system. Such use creates a lot of network traffic, which slows down our system, making it difficult for vital programs to operate efficiently. If you suspect a computer is being misused, you should report the incident to your immediate supervisor or contact the Director of Information Management. You can also call the Compliance Hotline.

Q. I am taking a continuing education class and CPNJ is reimbursing me for the tuition, since the course is designed to improve my job-related skills. In the meantime, I must take the Agency vehicle to perform my job. Often, I end my shift off site and must go immediately to class. In order to be on time for class, could I just use the Agency vehicle to go from work to class and then return it afterwards?

A. While we encourage employees to continue their education, the use of Agency property under these circumstances would not be appropriate. Often times resources, such as vehicles are stretched to the limit at the Agency, therefore, they must be returned to the facility after your duties are performed. In addition, the Agency's insurance may not cover such unauthorized use of the vehicle. Work with your supervisor to coordinate your schedule with the days you attend school.

Q. I was told by a CPNJ employee that I could supply a list of our patients to any outside source. Is this true?

A. Absolutely not. Patient lists are a confidential, valuable asset and should never be disclosed to anyone outside of the Agency without specific management approval. Disclosure of such information can expose the Agency and the disclosing individual to significant legal repercussions. Failure to comply with our policy could result in immediate disciplinary action being taken. If you receive any requests for such

information, you should immediately contact your supervisor, a member of Executive Management or the Compliance Officer.

Acknowledgement

CPNJ requires that you sign an acknowledgement confirming that you have received and read this Code of Conduct, understand it and agree to abide by it. Any questions regarding our Code of Conduct should be directed to the Corporate Compliance Officer.

Acknowledgment of Code of Conduct

By signing this form, I hereby acknowledge that I have received and agreed to read the Care Plus NJ Code of Conduct.

I agree to comply fully with the standards contained in this Code of Conduct. I understand that compliance with these standards, policies and procedures is a condition of my continued employment or association with Care Plus NJ. I also understand that Care Plus NJ reserves the right to occasionally amend, modify, and update the Code of Conduct.

I also acknowledge that the Code of Conduct is only a statement of principles for individuals and business conduct and does not, in any way, constitute an employment contract or an assurance of continued employment.

Name: _____ (please print)

Signature: _____

Date: _____ Department: _____