

THRESHOLD SERVICES, INC.

CODE OF CONDUCT

In carrying out Threshold Services' work in a manner consistent with its Mission, Vision, and Values, each employee, contractor, and agent has a responsibility to maintain a high standard of individual and organizational ethical and legal business practices. The Core Values of Threshold Services are Respect, Integrity, Quality, Community Advocacy and Resourcefulness. The Value of Integrity mean that we are honest and ethical in our individual and business practices and that we comply with laws and regulations that govern our health care system.

The following guidelines are meant to direct staff toward standards of ethical behavior in professional relationships with those served, with colleagues, with other individuals and professionals, and with the community and society as a whole. These guidelines are based on the fundamental values of worth, dignity, and uniqueness of all persons as well as their rights, opportunities, and desired personal future. They are also predicated on the quality of relationships that impact individualized service provision and foster conditions to promote these values.

Threshold Services is committed to conducting its affairs in a highly ethical manner complying with all laws of the State of Maryland and the government of the United States of America. Threshold Services subscribes to the following standards of conduct which are to be followed by all Threshold Services staff, whether employees or independent contractors.

Legal Practices

1. Discrimination –

- Threshold Services believes that the fair and equitable treatment of our employees, those we serve and the community at large is vital to the fulfillment of our mission. We demonstrate that commitment through Core Services Values, especially Respect and Integrity as related to the treatment of individuals.
- Threshold Services will, therefore, treat clients and recruit, hire, train, select, promote and terminate employees without regard to race, creed, color, national origin, disability, age or any classification protected by law
- Threshold Services will not tolerate any form of harassment or discrimination of clients, their families or employees. Allegations of abuse, harassment or discrimination should be promptly reported to the Supervisor and Human Resources. The allegation will be properly investigated in accordance with governmental laws and Threshold Services policies. Timely and appropriate action will be taken after the investigation.

2. Fraud, Abuse or False Claims

- Threshold Services expects employees to refrain from conduct that may violate federal or state fraud, abuse and false claims laws, including the obligation to prepare and submit accurate claims consistent with the following requirements:
 - All services rendered must be medically necessary;
 - All services must be accurately documented;
 - All services rendered must be accurately coded and accurately billed;
 - All bills/claims must be for services actually rendered;
 - All errors detected must be corrected promptly;
 - All erroneous bills that have been paid must be refunded;
 - Present no claim for payment or approval that is inaccurate, false, fictitious or fraudulent;
 - Make no false or misleading reports; and
 - Cooperate in training and investigation efforts.

- It is the obligation of each employee to become familiar with federal and state laws and regulations that apply to the delivery of services that are funded by Medicare and the Medicaid Programs.
- Threshold Services will provide training, education, access to information needed by employees to comply with applicable federal and state laws.
- Threshold Services will also establish policies and procedures to assure that, to the best of the abilities of the individuals compiling cost reports, information is presented in a legal and ethical manner on all cost reports and that financial records and reports are accurate and reliable.
- Each employee will be vigilant for fraudulent or illegal conduct by other persons.
- Each employee has an individual responsibility to promptly report suspected fraudulent or illegal behavior by any employee or independent contractor of Threshold Services or by any person with whom Threshold Services does business.
- There shall be no retaliation or other discrimination against any staff member who seeks guidance regarding the legality of an activity or who reports in good faith that actions or conduct may have been fraudulent or illegal.
- All violations or suspected violations shall be reported immediately to the Compliance Officer with concurrent notification to the employee's supervisor or to the Compliance Officer alone, if appropriate.
- Employees who make a report that they know to be false or misleading will be subject to appropriate disciplinary action.
- All Threshold Services employees share responsibility for maintaining and complying with required these policies and procedures.

Business Practices

1. The Threshold Services employee should strive to become and remain proficient in professional practice and the performance of professional functions, and should take full advantage of all available training opportunities to enhance professional practice and performance.
 - Annual mandatory training programs will be conducted for all Threshold Services staff members on these Standards of Conduct and on compliance with federal and state laws governing billing and other legal requirements.
 - All new staff members will receive training on these Standards of Conduct and applicable federal and state laws as part of orientation.
 - All staff members will seek guidance from appropriate supervisors if they are concerned about the legality of any task or activity.
2. All staff members and agents are on notice that failure to conduct business in a legal and ethical manner will affect performance evaluation and may result in termination or other disciplinary action.
3. Threshold Services will not enter into business relationships with any provider that has been barred from the Medicaid or Medicare Programs.
4. The Threshold Services employee should treat colleagues and other business associates with respect, courtesy, fairness, and good faith.

Clinical Practices

1. Confidentiality
 - Threshold Services and its employees possess and have access to a broad variety of confidential, sensitive and proprietary information. The inappropriate release of this information can be harmful to individuals, business partners, and Threshold Services itself.

Threshold Services employees, contractors and agents must actively protect and safeguard this information.

- Threshold Services should respect the privacy of clients and hold in confidence all information obtained in the course of professional service unless appropriate releases are obtained. If questions arise regarding information, employees should seek guidance from their supervisor or the CCO.
- Salary, benefit and other personnel information relating to employees must be treated as confidential according to Personnel Policies.

2. Client Rights

- The Threshold Services should make every effort to foster maximum empowerment and self-determination on the part of clients. Clients should be treated with respect and with consideration for individuality and uniqueness.
- Threshold Services' primary responsibility is to the clients.
- When setting fees, Threshold Services should ensure that fees are fair, reasonable, considerate, and commensurate with the services provided or performed and with due regard for the clients' ability to pay.

Conflicts of Interest

1. No remuneration or item of value will be given or accepted in exchange for any patient referral.
2. All arrangements with referral sources shall comply with applicable laws governing permissible referrals.
3. No staff member will participate in any transaction in which his or her personal interest is in conflict with the interest of Threshold Services. Each staff member will promptly disclose to an appropriate supervisor any situation which may constitute a conflict of interest.
4. The Threshold Services mental health professional has the responsibility to relate to the clients of colleagues with full professional consideration.

Code of Conduct Compliance

1. Any failure to report non-compliance puts Threshold Services and its employees, directors, officers, contractors, suppliers and vendors at risk for legal exposure for violations of administrative, civil or criminal statutes and further jeopardizes Threshold Services' right to seek payments for health care services rendered to federal health care program beneficiaries. Threshold Services is required to and will undertake appropriate disciplinary action or other reporting obligation as a consequence of any employee or other covered person failing to report noncompliance issues with federal health care programs or the Threshold Services' Code of Conduct and Compliance Policy.
2. Threshold Services maintains a confidential disclosure program for reporting non-compliance issues. All Threshold Services employees and other covered persons have the right to report non-compliance issues or concerns in a confidential and anonymous manner and Threshold Services pledges to maintain a non-retaliatory and non-retribution environment for non-compliance reporting. The Threshold Services toll-free hotline is (800) 398-1496 (English speaking), (800) 216-1288 (spanish speaking); E-mail: reports@lighthouse-services.com; Website (you must provide us with a username: Threshold Services and password: Recovery) <http://www.lighthouse-services.com> (click on submit a report); or fax (215) 689-3885.
3. All concerns or issues reported will be reviewed and appropriate corrective action will be taken in response to any concerns or issues raised.

4. Threshold Services is committed to investigating all reported concerns promptly and confidentially to the extent possible. All Threshold Services employees shall cooperate with investigation efforts. When an internal investigation finds a violation, it is the policy of Threshold Services to initiate appropriate corrective action, including, but not limited to, making prompt restitution of any overpayment amounts and implementing systemic changes to prevent a similar violation from recurring in the future.
5. Disciplinary Action: Any Threshold Services employee who violates the Code may be subject to appropriate disciplinary action and/or retraining, to prevent recurrence of the violation. In determining the level of disciplinary action to be taken, management will consider the amount of training provided to the involved employee(s). The discipline imposed will depend on the nature, severity and frequency of the violation.
6. Acknowledgment Process: Following training, employees will be required to sign an acknowledgment statement confirming they have received this Code of Conduct and understand that it represents mandatory policies of Threshold Services. Employees will be required to sign this acknowledgment as a condition of employment. Adherence to the Code of Conduct and participation in related activities and training will be considered in decisions regarding hiring, promotion, evaluation and continuation of employment.

Rev 10/08. Approved by the Board of Directors on October 27, 2008