

VETERANS RESOURCE CENTERS OF AMERICA

CORPORATE COMPLIANCE PLAN

COMPLIANCE STATEMENT

Veterans Resource Centers of America (VRCOA) is committed to provide the highest quality behavioral health prevention and treatment services that promote and support each individual's unique needs. VRCOA has always sought to adhere to all laws, rules, and regulations, and has always stated that it is the obligation of all employees, volunteers, contractors and other professionals to follow the organization's Code of Conduct as well as their own professional Code of Ethics. The organization understands that in this time of rapid health care changes that ongoing training and education will be necessary to maintain our commitment to quality care, therefore the Executive Director has appointed a senior management person as the VRCOA Corporate Compliance Officer.

VRCOA has a regulatory compliance program whose purpose is to assist in preventing the submission of erroneous claims or engaging in unlawful conduct involving federal health care programs. This compliance program further asserts that all employees have an affirmative, ethical duty to come forward and report erroneous or fraudulent conduct, so that it may be corrected. This plan addresses the seven components outlined by the Compliance Program guidance issued by the U.S. Officer of the Inspector General: written standards of conduct for employees; written policies promoting commitment to compliance and addressing specific areas of potential fraud; designated compliance officer; education and training; audits to monitor compliance; disciplinary action; investigation and remediation of identified problems.

MISSION STATEMENT

Veterans Resource Centers of America, Inc. (VRCOA) is a community-based organization, serving veterans and non-veterans. Our goal is to support individuals and families as they build better lives for themselves, their families, and our communities. With offices throughout Northern California VRCOA is committed to meeting the needs of disenfranchised citizens by providing comprehensive services, which include but are not limited to transitional housing, employment and training programs, comprehensive case management services, and small business assistance.

CODE OF CONDUCT

VRCOA holds its employees, and independent contractors to the highest ethical, moral, and legal standards in their conduct and service delivery. VRCOA expects its employees, and independent contractors to maintain respect both for the privacy and well-being of the persons served and for the welfare and protection of the general public. VRCOA strives to enhance the principles of competency, accountability, responsibility, nondiscrimination and service excellence. VRCOA's employees, and independent contractors, in fulfilling the mission of VRCOA, voluntarily subscribe to uphold these stated principles.

Additional detail may be found in VRCOA Code of Conduct.

STANDARDS OF CONDUCT

VRCOA current corporate policies and procedures are reasonably capable of reducing the prospect of

erroneous or unlawful conduct involving federal healthcare programs, and are the foundation of the compliance plan. Where necessary, VRCOA will develop additional procedures to ensure compliance.

Specific individual(s) within upper management of VRCOA will be assigned responsibility to oversee compliance with such standards and procedures. The Executive Director will be responsible for the implementation of the compliance plan and for maintaining an ongoing program of compliance through education, training and the development of appropriate policies and procedures.

VRCOA will use due care not to delegate substantial discretionary authority to individuals whom the organization knows, or should know, through exercise of due diligence, has a propensity to engage in illegal activities.

VRCOA will take steps to communicate effectively its standards and procedures to all employees and other agents, by requiring participation in training programs or by disseminating publications that explain in a practical manner, what is required.

VRCOA will take reasonable steps to achieve compliance with its standards by utilizing monitoring and auditing systems reasonably designed to detect criminal conduct by its employees and other agents, and by having in place and publicizing a reporting system whereby employees and other agents may report criminal conduct by others within the organization without fear of retribution.

The standards will be consistently enforced through appropriate disciplinary mechanisms, including, as appropriate, discipline of individuals responsible for the failure to detect an offense. Adequate discipline of individuals responsible for an offense is a necessary component of enforcement; however, the form of discipline that will be appropriate will be case specific.

After an offense has been detected, VRCOA will take all reasonable steps to respond appropriately to the offense and to prevent further similar offenses, including any necessary modifications to its program to prevent and detect violations of law.

INVESTIGATION PROCESS AND TIMEFRAMES

Upon receipt of any report of suspected wrongdoing (including an alleged violation of the VRCOA's Code of Conduct), the Executive Director will initiate an immediate investigation. Investigations of corporate compliance matters will be conducted as expeditiously as possible with results, including recommendations for any disciplinary and/or corrective action. The Executive Director his/her designee is authorized direct and unimpeded access to all staff members as a way to expedite corporate compliance investigations. All corporate compliance investigations will be completed as quickly as possible, but not later than 30 calendar days from the time of "discovery".

BUSINESS ETHICS

VRCOA will operate in accordance with all applicable laws and regulations in order to maintain the integrity of our organization. Employees have a duty to report any perceived violation of applicable laws, regulations and professional standards to management, human resources, or the Executive Director.

In all business, marketing and human resource practices, employees will be guided by the following corporate philosophy and ethical standards: honesty, integrity, respect and fairness constitute the key components of all of our dealings with clients, vendors/suppliers, potential customers, employees and our communities. In all business and marketing activities, all employees are hereby enjoined to represent the

organization and its programs and services in an honest manner and to accurately portray the capabilities of the organization and its employees. This is an essential step if the organization is to establish productive and meaningful professional relationships in the local area. A critical part of the organization's corporate compliance program is the expectation that each employee will fully comply with all state and federal laws, statutes, rules and regulations pertaining to business, marketing and human resources and do so at all times and without exception.

No business code of ethics/conduct can cover every conceivable scenario that might arise in the course of business, marketing, human resource management and business in general. Therefore, all employees are enjoined to abide by the aforementioned, guiding principles and to seek assistance and clarification from the Executive Director in the event that any situation or scenario arises that might challenge the application of these principles. As a related matter, situations and circumstances occasionally arise that may represent a potential conflict of interest. As a general principle, no employee will make any decision on behalf of the company or obligate the company in any way that would represent, result in or give the appearance of personal gain or benefit, however slight. In such cases, employees are enjoined to discuss the situation with the Executive Director prior to making any decision or engaging in any practice that would represent a commitment of the company's assets, obligate the company in any way and/or have the potential to give the appearance of impropriety or conflict of interest.

As part of the new employee orientation process, all new employees will be fully informed as to the organization's expectations regarding conformance with all applicable codes of conduct. Additionally, new employees will be asked to sign a copy of the organization's Code of Conduct as a way to demonstrate their awareness of the code. Finally, a copy of the code will be posted conspicuously in the organization's office as a reminder to both clients and staff about the organization's ongoing commitment to quality care.

Billing and Cost Reports

- VRCOA strictly prohibits the submission of any claim for payment or reimbursement to any third party that is false, fraudulent, knowingly inaccurate, or fictitious.
- VRCOA will only submit for payment or reimbursement claims for services actually rendered that are appropriately documented in clients' treatment and/or medical records using billing codes that accurately describe the services provided.
- VRCOA will only provide those services which are individualized, specific, and consistent with symptoms or confirmed diagnosis of the illness and can reasonably be expected to improve the individual's condition or prevent further regression, and not in excess of the client's need.
- VRCOA will take immediate steps to alert appropriate VRCOA personnel if inaccuracies are discovered in our cost reports or in claims submitted for payment or reimbursement.

Client Referrals

VRCOA will not solicit or receive, or offer to give, or give anything of value (e.g., in cash or in kind) to any actual or potential referral source for the referral of clients or services. Kickbacks, bribes, rebates or any kind of benefits intended to induce referrals are strictly prohibited.

Client Treatment Records

- VRCOA will maintain complete and accurate client treatment and medical records.
- VRCOA will ensure that all client treatment and medical records and related information, including the fact that a person is a client of VRCOA remain strictly confidential.

Environmental Laws

VRCOA will promote sound environmental and safety practices to ensure compliance with all relevant laws, regulations and accreditation standards.

CONFLICT OF INTEREST

VRCOA will take all reasonable steps to avoid conflicts, or appearance of conflicts, between the private interests and the official responsibilities and performance of our duties. VRCOA employees have a duty to report any actual or perceived conflicts of interest to management or the Executive Director.

Outside Employment

VRCOA will not prohibit employees from holding other jobs, as long as such does not conflict with the performance of their VRCOA job. VRCOA employees will not serve as a director or have a financial interest in, or a business relationship with another organization that might result in any conflict with the purposes, aims or goals of VRCOA

Gifts

VRCOA will not solicit or accept gifts, favors, loans or other types of gratuities or hospitality. If an employee has doubt as to the appropriateness of a gift, they should seek guidance from management.

PROTECTION OF ASSETS

VRCOA is committed to protecting the organization's assets, and the assets of others entrusted to us, including physical property and proprietary information, against loss, theft, or misuse. VRCOA employees have a duty to report any actual or perceived loss, theft or misuse of VRCOA property or the assets of others to management or the Executive Director.

VRCOA employees are personally responsible and accountable for the proper expenditure of VRCOA funds and for the proper use of the organization's property. VRCOA will obtain approval from the appropriate authority, prior to the commitment or expenditure of any VRCOA funds.

VRCOA will follow generally accepted accounting principles, established finance procedures and internal control procedures in handling and recording all funds and property.

VRCOA employees have a duty to preserve VRCOA' assets, property, facilities, equipment and supplies.

VRCOA employees have a duty to safeguard the property of clients, employees and visitors.

VRCOA employees have a clear obligation to the productive use of time while at VRCOA

HUMAN RESOURCES

VRCOA is committed to protecting and supporting all employees as well as helping them to achieve their fullest potential in a fair and equitable manner. VRCOA employees have a duty to report any actual or perceived mistreatment, discrimination, safety issues, hostile activity, legal violations or other non-compliance issues occurring in the workplace to management or the Executive Director.

Corporate Responsibilities

VRCOA will not tolerate any form of physical, psychological or sexual abuse. Sexual abuse includes unsolicited or unwelcome sexual advances, requests or demands for sexual favors or any verbal, physical or visual conduct of a sexual nature, which might create a hostile or uncomfortable environment.

VRCOA employees will conform to the standards of their professions and will exercise reasonable judgment and objectivity in the performance of their duties.

VRCOA employees will demonstrate respect for their clients and co-workers by notifying supervisor in advance if they are unable to report for work as scheduled.

Equal Employment Opportunities

VRCOA will ensure that everyone is afforded equal pay for equal work regardless of gender, age, disability, race, color, religion, marital status, sexual orientation or national origin.

Safety

VRCOA employees will comply with all work and safety rules, regulations and policies.

VRCOA will take all reasonable precautions to ensure the safety of employees, as well as the safety of clients, visitors, and other personnel.

VRCOA maintains and regularly communicates its emergency plans and procedures to employees and clients to maximize safety. VRCOA employees practice safety awareness by thinking defensively, anticipating potential hazards and reporting unsafe conditions immediately. VRCOA maintains an atmosphere that is free from workplace violence. VRCOA does not engage in verbal or physical confrontation with a potentially violent person.

VRCOA promotes a work environment that discourages smoking.

VRCOA promotes an environment that is drug and alcohol free. The illegal possessions, distribution, use, sale or abuse of controlled chemical substances or alcohol while on company business or on company premises is strictly prohibited.

COMMUNICATION

VRCOA will foster an environment that encourages open communication. VRCOA employees have a duty to report any actual or perceived communication problem to management or the Executive Director.

Organization Communication

VRCOA employees are responsible for sharing ideas, resolving problems or concerns and treating all opinions with respect and consideration.

VRCOA employees raise legitimate questions or concerns in an appropriate and efficient manner. Supervisors and management shall respond, in a timely manner, to questions and concerns brought to their attention.

VRCOA employees strive to understand the duties, responsibilities, and challenges that face our fellow employees.

VRCOA encourages employees to participate in conference and professional meetings that directly relate to program needs.

EMPLOYEE RESPONSIBILITIES

Maintaining high standards of ethical and moral conduct is in everyone's best interest. Responsibilities include the following:

- Acting in accordance with VRCOA Code of Conduct
- Being familiar with relevant laws and regulations that apply directly to day-to-day responsibilities
- Asking questions when in doubt about the ethical, legal, or moral implications of a situation
- Reporting violations of the law, regulations, or VRCOA Code of Ethics

Managers/Supervisors responsibilities:

- Respect diverse opinions
- Maintain an open door policy and listen to issues that are raised
- Respond to questions and problems in a timely manner
- Assist subordinates in understanding their rights and obligations under law, regulations, and the Standards of Conduct

CORPORATE RESPONSIBILITIES

Non-Retaliation Policy

VRCOA will not take any disciplinary action or other types of retaliation against any employee who, in good faith, reports a concern, issue, or problem to management, or the Executive Director.

RISK AREAS

VRCOA does conduct coding audits preliminary to billing submission. Education and training is designed to facilitate knowledge and understanding of the applicable coding policies and procedures and also addresses problems detected through the audit process.

Coding and billing risk areas include the following:

- Billing for items or services not actually documented
- Alteration of documentation
- Coding without proper documentation
- Billing for services provided by unqualified or unlicensed clinical personnel
- Availability of all necessary documentation at the time of coding
- Confidentiality of information/records
- Accurate use of provider identification numbers
- Duplicate billing
- Waiver of co-payments and billing third party insurance only