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## **Code of Conduct**

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## **Commitment to Integrity**

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## Riverside University Health System - Behavioral Health

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Welcome!

Riverside University Health System – Behavioral Health (RUHS – BH) is pleased that you have decided to work with our Department. We have a commitment to provide the highest quality of services with honesty and integrity. We expect everyone affiliated with us to demonstrate the values of integrity, honesty, and fairness at all times.

To ensure a commitment to these values, the Department has established this Code of Conduct booklet entitled “Commitment to Integrity”. Please take the time to read this document carefully. It is the expectation of RUHS – BH that each employee, business partner and contract provider associated with our Department will adhere to the standards within this booklet as a condition of employment or contractual arrangement with RUHS – BH.

If you have any questions, or encounter a situation that you believe violates this code, you should immediately discuss it with the program supervisor or manager within your chain of command. Alternatively, you may report potential compliance problems anonymously by calling the Compliance Line at (800) 413-9990. There will be no retaliation for asking questions or identifying improper conduct.

RUHS – BH is fully committed to the standards reflected in this Code of Conduct booklet. We trust that we will receive your full support in following these values to succeed in our mission of providing excellent services and establishing strong partnerships throughout Riverside County.



*Matthew Chang, M.D.*  
*Director*  
*Riverside University Health System - Behavioral Health*

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## Commitment to Integrity

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### Our Mission Statement

Riverside University Health System exists to improve the health and well-being of our consumers and communities through our dedication to exceptional and compassionate care, education, and research.

### Our Vision Statement

In defining its vision, Riverside University Health System looks to lead the transformation of health care and inspire wellness, in collaboration with our communities, through an integrated delivery network to bring hope and healing to those we serve.

### Our Values

- ◇ Tried
- ◇ Teamwork
- ◇ Respect
- ◇ Integrity
- ◇ Excellence
- ◇ Discovery
- ◇ True - to our values

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## Introduction

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### Introduction to the Code of Conduct

Each employee, contractor, and volunteer, acting on behalf of RUHS – BH, is expected to act in an ethical and lawful manner, to follow the Code of Conduct, and to read, understand, and follow applicable County and Departmental policies. Staff members will abide by the Code of Ethics of their respective professions.

RUHS - BH has designed and implemented a Compliance Program to strengthen the awareness of compliance issues to all employees, and to prevent, detect, and respond to compliance violations. Adhering to licensure requirements, federal, state, and local laws and regulations are viable to the success of our mission. This Code of Conduct is intended to express our core values related to:

- ◇ Quality of Care and Services
- ◇ Adhering to Laws and Regulations
- ◇ Conflict of Interest
- ◇ Records Maintenance
- ◇ Workplace Conduct
- ◇ Work Relationships
- ◇ Protecting County Assets

Violations of federal and/or state healthcare regulations carry serious consequences to both the organization and to the individual. In addition to criminal penalties, violations can result in being excluded from federal healthcare program participation.

You are encouraged to ask questions if you are not sure about how things should be done. Review the Code of Conduct, the policies and procedures, and discuss any questions you have with your supervisor, manager or other supervisory/management staff within your chain of command. Employees may also contact the Compliance Officer at (800) 413-9990.

This Code of Conduct and the related policies will be reviewed and updated as circumstances warrant. Each employee will acknowledge that they have received a copy of the Code of Conduct, and will abide by it at all times.



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## Quality of Care and Services

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We are committed to offering and providing high quality care that is skilled, compassionate, reliable and consistent with our consumers, constituents, and community's needs. RUHS – BH staff shall:

- ◇ Treat consumers with dignity, respect and courtesy.
- ◇ Provide appropriate care and service, including individualizing the service to address the needs and goals of each consumer, and will not provide services beyond their scope.
- ◇ Employ professionals with proper credentials and ensure that all members of the treatment team have experience and expertise in the area(s) in which they provide service,.
- ◇ Ensure there is no disparity in treatment or quality of care delivered based on the consumer's ability to pay.
- ◇ Provide services in accordance with applicable federal, state, and local government laws and regulations, and the standards practiced in the community.
- ◇ Accurately and completely document all encounters in the client's record.
- ◇ Provide consumers with the information needed to make fully informed decisions. Consumers have a right to receive information about RUHS - BH services, policies and procedures, and charges.
- ◇ Treat consumers in a culturally sensitive manner appropriate to their background, culture, religion, and heritage. No one shall be denied care on the basis of race, gender, religion, color, economic status, sexual orientation, age, source of payment, or any other discriminatory characteristic.
- ◇ Participate in activities that promote quality improvement. Bring deficiencies in the quality of care and/or services provided to our consumers to the attention of those who can properly assess and resolve the deficiency.
- ◇ Perform our jobs in a manner where no harm is caused to our consumers.
- ◇ Promote a positive image for RUHS - BH, through its employees and through client services.
- ◇ Maintain an awareness and sensitivity of the cultural diversity of staff and clients in all interactions, providing high quality, accessible, non-discriminatory services.

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## Adhering to Laws and Regulations

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RUHS—BH follows applicable laws and regulations while conducting our business in an ethical and honest manner that enforces RUHS - BH's commitment to the community. We will:

- ◇ Comply with all applicable federal, state, and local laws, rules, regulations, standards, and other governmental requirements. We comply with all statutes, guidelines, and requirements that govern healthcare programs.
- ◇ Not engage in any practice that involves unethical or illegal activity. We will report any incidents of unethical or illegal activity.
- ◇ Not enter into any joint venture, partnership or other risk-sharing arrangement with any entity where there is a potential or actual referral source to County programs unless the arrangement has been reviewed and meets the applicable requirements as approved by the Riverside County Board of Supervisors. Questions regarding these arrangements are to be addressed through the chain of command.
- ◇ Take reasonable precautions to ensure that billing and/or coding of claims are prepared and submitted accurately, timely, and consistently with federal, state, and local laws and regulations, as well as departmental policies and procedures and/or agreements with third party payers. This includes federal healthcare program regulations and procedures or guidelines otherwise communicated by regulatory agencies (e.g. the Center for Medicare and Medicaid Services) or their agents.
- ◇ Ensure that no false, fraudulent, inaccurate or fictitious claims for payment or reimbursement of any kind are submitted.
- ◇ Bill only for eligible services actually rendered and fully documented. When the services must be coded, only billing codes that accurately describe the services provided will be used.
- ◇ Act promptly to investigate and correct discovered errors in claims or billings.
- ◇ Voluntarily disclose to third party law enforcement or regulatory agencies violations of law, regulations, or standards, where appropriate and legally required.

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## Conflict of Interest

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We avoid conflicts of interest and/or the appearance of conflicts of interest between our own personal interests and the best interests of the County by:

- ◇ Disclosing any potential conflict of interest in accordance with Department Policy.
- ◇ Avoiding outside commitments that are inconsistent or incompatible with our ability to properly perform duties for RUHS - BH or any activity that conflicts with the known interests of RUHS - BH and our consumers. Examples include, but are not limited to:
  - ◆ Having a financial interest, or employment with, a company doing business with RUHS - BH over which the employee has some control or influence in their official capacity.
  - ◆ The use of County time, facilities, equipment, or badge for private gain or advantage.
- ◇ Not engaging in any activity involving personal time or energy demands which render the performance of Riverside County duties less efficient.
- ◇ Conducting ourselves in a manner appropriate to our standing as representatives of local government, representing the best interests of the County's citizens.
- ◇ Avoiding involvement in activities that improperly influence our actions or job functions or are stated in the Conflict of Interest policy.
- ◇ Reporting potential conflicts of interest to RUHS - BH in accordance with the Conflict of Interest policy.
- ◇ Not accepting or providing benefits/gifts that create conflict with personal interests and RUHS - BH's interests. These benefits include, but are not limited to, accepting meals, refreshments, transportation, entertainment or any item of monetary value provided or received in connection with assigned duties.



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## Records Maintenance

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RUHS - BH is committed to maintaining accurate and appropriate records in accordance with all federal, state, and county laws and regulations and departmental policies and procedures. We:

- ◇ Maintain timely, complete, accurate and thorough records.
- ◇ Ensure that all records, whether paper or electronic, are maintained in accordance with the guidelines established by the Riverside County Board of Supervisors and applicable federal and state government and civil codes.
- ◇ Ensure that records are maintained in an accurate and confidential manner in order to protect privacy and to provide factual information.
- ◇ Maintain documentation guidelines according to the legal requirements for the record type.
- ◇ Comply with all federal, state, and local laws, regulations and departmental guidelines governing the confidentiality of information.
- ◇ Ensure that timesheets and other cost records and reports are complete and reflect accurate information.
- ◇ Maintain business information to preserve a clear audit trail for claims and billing records (including charts).

Staff providing services are responsible for appropriate documentation and certification under penalty of perjury to the accuracy and delivery of medically necessary services provided in accordance with California Code of Regulations, Title 9, Sec. 1840.112.

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## Workplace Conduct

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We recognize that our greatest strength lies in the talent of our workforce who foster our success and reputation. We treat our colleagues with respect, dignity, and courtesy, and provide our employees with clear direction about what is expected of them. Acceptable workplace conduct includes:

- ◇ Maintaining a work environment free from all forms of harassment or intimidation, showing respect and consideration for each other.
- ◇ Offering equal employment and advancement opportunities to all applicants and employees pursuant to Departmental and County policies.
- ◇ Conforming to the codes of ethics and standards of our respective professions, exercising sound judgment in the performance of duties.
- ◇ Complying with work and safety policies in accordance with County and Departmental policies and procedures, including, but not limited to, the mandated No-Smoking Ordinance in County buildings and vehicles, and the Riverside County Alcohol and Drug policy prohibiting the use of alcohol and/or other drugs on and off the premises while on duty or on a standby or on-call status.
- ◇ No tolerance for discrimination or abuse against clients or staff.
- ◇ No tolerance for workplace intimidation or violence.
- ◇ No tolerance for unwelcome sexual advances, requests for sexual favors, or verbal or physical innuendos of sexual conduct constituting harassment.
- ◇ Under no circumstances should staff take actions that create an appearance of proselytizing, or impose their own spiritual/religious and/or political values and beliefs on others.
- ◇ No tolerance for verbal, physical or sexual harassing, threatening or abusing clients, family members, or other staff.

County and Departmental policies provide mandatory training on Employee Orientation, Sexual Harassment, Workplace Violence, Safety, and Compliance. There is a clear understanding of the expectation for professional conduct from staff and volunteers.

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## Work Relationships

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RUHS - BH is committed to establishing and maintaining ethical work relationships. We:

- ◇ Seek positive and cooperative relationships within RUHS - BH as well as with other governmental programs, vendors, contractors, community groups, and industry providers, to enhance services and resources available to the public.
- ◇ Are honest and forthright in providing information to consumers, contractors, vendors, payers, other employees or agents, and the community.
- ◇ Bring to the attention of supervisors and managers, information related to non-compliance or lack of adherence to Departmental policies/procedures and applicable federal, state, or local regulations.
- ◇ Cooperate in accomplishing RUHS - BH's commitment to maintaining a work culture that promotes the prevention, detection and resolution of instances of conduct that do not conform to ethical standards and our Code of Conduct.
- ◇ Ensure that no employee is required to compromise their appropriate professional integrity, standards, judgment or objectivity in the performance of their duties.
- ◇ Ensure that all reports or other information provided to any internal or external entities, including federal, state, or local government agencies, are accurate and submitted in a timely manner.
- ◇ Perform duties in a way that promotes the public trust and encourages participation and access to County programs and resources.
- ◇ Empower supervisors and managers to be responsible for ensuring that their staff have sufficient information to comply with established laws, regulations and policies.
- ◇ Expect supervisors and managers to be responsible for providing appropriate and necessary training, and for responding appropriately and in a timely manner to address issues or concerns brought to their attention.

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## Protecting County Assets

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We protect the County's property and assets by:

- ◇ Using work hours in a productive and professional manner.
- ◇ Obtaining appropriate authorization prior to expending funds.
- ◇ Being responsible and accountable for the proper expenditure of County funds according to County Purchasing guidelines.
- ◇ Performing cash handling and receipting duties in accordance with County and Departmental policies and procedures.
- ◇ Disposing of surplus, obsolete or junked property in accordance with County policies and procedures.
- ◇ Safely storing, securing, documenting and inventorying supplies, and reporting missing supplies promptly to appropriate supervisors.
- ◇ Safely storing and preserving departmental records, both electronic and paper, according to County and Departmental policy.
- ◇ Disposing of medical and/or departmental waste or other hazardous materials properly and lawfully.
- ◇ Using computer systems, networks, and software in a manner that is consistent with Department licenses and/or rights, and according to County and Departmental policy.
- ◇ Storing equipment, data files, and software in a secure manner, in accordance with Departmental policies and procedures.
- ◇ Reporting any observed misuse of County property or funds to an appropriate supervisor or manager, Human Resources, or the confidential Compliance Hotline.



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## Deficit Reduction Act/False Claims Act

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In compliance with Section 6032 of the Deficit Reduction Act of 2005, and with the federal False Claims Act, RUHS - BH established a Compliance Plan, as well as policies for all employees detailing our commitment to detect and prevent waste, fraud, or abuse in federal, state and local health care programs.

It is the policy of RUHS—BH to only submit valid claims for services performed in an efficient, effective, and professional manner. All RUHS - BH employees, contractors and other workforce members have a duty to participate in efforts to identify, report and prevent waste, fraud, and abuse, and ensure that public resources are used ethically, prudently, and for legally designated purposes.

The Federal False Claims Act prohibits any person from submitting to the federal government a false claim for payment or approval. False claims can include overcharges, underpayments, providing inappropriate or unnecessary medical procedures in order to increase reimbursement, up-coding, unbundling services to increase revenue, or charging for one service when providing another. Under the False Claims Act, those who knowingly submit, or cause another person or entity to submit, false claims for payment of government funds are liable for three times the government's damages, plus civil penalties of \$5,000 to \$11,000 per false claim. In a civil lawsuit, the government does not have to prove intent to defraud for financial gain, only that the claims submitted were not valid.

Criminal lawsuits for willful misrepresentation can take many forms, including deliberately falsifying documentation for payment, deliberately covering up or hiding information about a false claim, lying to an investigator, or obstructing an ongoing investigation related to false claims action. If found guilty, there are both financial penalties and possible imprisonment for up to five years.

Any person who becomes aware of an entity filing false claims with the government may bring an action in court under this law for up to six years after the false claim. That person becomes known as a "*qui tam*" or "whistleblower." Employers cannot retaliate or punish an employee who initiates a *qui tam* lawsuit.

RUHS - BH employees are required to report any suspected inappropriate activity to their immediate supervisor or the Compliance Officer at 1-800-413-9990.



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## Responsibilities of Employees

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RUHS - BH expects that all employees will conduct themselves with honesty and integrity, maintaining high standards of professional behavior and responsibility at all times. RUHS - BH is committed to a work environment that encourages and promotes the ideals for employees to demonstrate the highest ethical standards while performing daily tasks. With these goals in mind, RUHS - BH encourages active participation, (including Executive, Administrative, Supervisory, and Program staff) in our department's Compliance Program. Each employee is responsible for their own behavior which includes:

- ◇ Helping to create a culture within RUHS - BH that promotes the highest standards of ethics and compliance.
- ◇ RUHS - BH staff members will not misrepresent themselves regarding their professional credentials, qualifications, affiliations, and functions.
- ◇ Reading, knowing, complying with, and retaining a copy of the Code of Conduct.
- ◇ Complying with Departmental policies and procedures, laws and contractual obligations. This includes statutes, regulations and guidelines applicable to federal, state, and local healthcare programs.
- ◇ Reporting violations of the Code of Conduct, Departmental policies and procedures or laws and regulations.
- ◇ Not being exempt from the consequences of one's own misconduct by self-reporting, although self-reporting will be taken into consideration in determining the appropriate course of action.
- ◇ RUHS - BH staff are prohibited from engaging in social or business relationships with clients, participants or their family members for personal gain.
- ◇ RUHS - BH staff are prohibited from having sexual contact with clients and/or participants.
- ◇ RUHS - BH staff will not engage in verbal, physical or sexual harassment or unlawful discrimination with clients or other staff members.

Failure to comply potentially subjects an employee to civil and criminal liability, sanctions, penalties or disciplinary action.

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## Confidentiality

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RUHS - BH is committed to keeping all Protected Health Information (PHI) private. PHI is considered to be any information that reasonably identifies an individual and their past, present, or future physical or mental health or condition. This includes the fact that an individual is a client of RUHS - BH, and includes any combination of the person's first and last name, address, Social Security number or date of birth. No official or employee of RUHS - BH shall knowingly disclose confidential client PHI except as authorized or required by law.

- ◇ Verbal communications regarding PHI will take place in private areas so that third parties not directly related with the participant's treatment cannot overhear the conversation.
- ◇ Access to PHI is limited to the minimum amount necessary for an employee to perform their job duties.
- ◇ RUHS - BH staff and volunteers are specifically prohibited from viewing their own medical records and PHI, as well as the medical records and PHI of their family members, friends, acquaintances, colleagues, or any other individual, unless it is required to perform their job duties.
- ◇ When ready for discard, any document containing PHI will be shredded.

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## Statement of Non-Retaliation

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No disciplinary action or retaliation will be taken against an employee for reporting, in good faith, a perceived compliance issue, problem, concern, or violation. The phrase "in good faith" means that the employee honestly or truthfully believes or perceives the information reported to be true. Reports that are knowingly false and deliberate will not be tolerated and appropriate actions will be taken.

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## **RUHS - BH Compliance Officer**

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RUHS—BH has designated a Compliance Officer to oversee the Compliance Program which was established to prevent, detect and eliminate waste, fraud and abuse, thereby protecting the financial integrity of governmental funded programs and the health care system. Policies, procedures, and monitoring tools have been developed and implemented to identify risks, strengthen controls, and ensure compliance with Federal, State and local healthcare regulations. Any questions or concerns should be brought up by staff through their chain of command, and/or to the Compliance Officer.

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## **RUHS - BH Compliance Program**

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The Compliance Program is designed to maintain our commitment to the highest standards of ethics and compliance. To obtain guidance on an ethics or compliance issue or to report a suspected violation, you are encouraged to first raise the issue with your supervisor or manager, if you are comfortable doing so, as they are most familiar with your work requirements.

You are always free to call the Compliance Officer directly. Depending upon the issue, the Compliance Officer may redirect you to an appropriate resource. The Compliance Officer will liaison as necessary to follow through to resolution. For example, compliance questions that involve: Employee relations may be referred to Human Resources; Quality of care may be referred to Quality Improvement; Coding and billing may be referred to Patient Accounts.

We are prepared to support you in meeting the standards set forth in this "Commitment to Integrity" booklet. We will make every effort to maintain and protect, within the limits of the law, the identity of any individual who reports possible misconduct in confidence.

We are committed to investigate all reported concerns promptly, and cooperate with complaint investigations. If an investigation substantiates a violation, we will initiate a plan of correction, take appropriate disciplinary action, report overpayments, notify appropriate governmental agencies, and implement change to prevent a recurrence.

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## Confidential Disclosure Program

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You have an obligation to report, to the supervisor or manager within your chain of command, any known or suspected violations to this Code of Conduct, as well as any law, statute, regulation, policy, procedure or guideline applicable to the federal healthcare programs.

If you are uncomfortable reporting a suspected violation, or if you believe that the issue has not been handled appropriately, you are encouraged to call the Compliance Office at (951) 358-4521. You may also report concerns to the Compliance Office by submitting a "Report of Suspected Violation" to Mail Stop 3872.

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## Anonymous Reporting

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If you want to report a suspected violation and wish to remain anonymous, you may call the 24-hour toll-free Compliance Line. The Compliance Line (800) 413-9990 provides a confidential means to report compliance related concerns or violations after hours and/or when you are away from the office/clinic.

Calls will be treated as confidentially as practicable or allowed by law. **You are not required to identify yourself when reporting a concern.**

Committing or condoning retaliation for good faith reporting of a perceived or suspected Code of Conduct violation, or for participating in an investigation of an alleged violation will not be tolerated. Any employee who commits or condones any form of retaliation is subject to disciplinary action in accordance with the County discipline standards.



Riverside County Board of Supervisors

Kevin Jeffries  
District 1

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District 2

Chuck Washington  
District 3

V. Manuel Perez  
District 4

Jeff Hewitt  
District 5



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 **Riverside  
University**  
**HEALTH SYSTEM**  
Behavioral Health

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Compliance Program  
4095 County Circle Drive  
Riverside, CA 92503  
(951) 358-4521  
(800) 413-9990

[rcdmh.org](http://rcdmh.org)  
[www.riverside.networkofcare.org](http://www.riverside.networkofcare.org)  
RUHS-BH BK/Com-001 Rev. 07/19

This document is available in alternative formats upon request.