



## Compliance Program Manual

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## Introduction

To our valued workforce members:

Centria Healthcare and Centria Autism Services (collectively referred to as “Centria” or “Company”) provide its clients with high quality services. We enjoy a reputation of integrity and excellence in the communities that we serve. This reputation is one of our greatest assets. Our achievements depend on the trust our clients and professional associates place in us. To this end, it is the policy of Centria that all individuals conduct themselves with integrity. Individuals must act in conformance with all legal requirements, as well as Centria’s policies, procedures, and Code of Conduct.

To outline Centria’s expectations in this area, we have implemented a formal Corporate Compliance Program. It is the intent of Centria for employees, volunteers, students/interns, business associates and contractors (employees or workforce) to use this Compliance Program as a guide in furtherance of Centria’s continuing good-faith efforts in complying with applicable federal, state, and third-party payor laws, rules, regulations, and policies.

This Compliance Program Manual (referred to as “Manual”) is designed to provide employees with basic information regarding Centria’s Compliance Program, Code of Conduct, common compliance issues, and the ways that employees can report any compliance concerns. Centria believes that properly educated employees will do the right thing because they know the right thing to do.

## Centria’s Corporate Compliance Program

It is important that employees understand the primary reasons why Centria has a Corporate Compliance Program. First, we have many types of government contracts across the country. Because of our government contracts, it is critical we follow all laws and regulations to avoid legal consequences or loss of business.

Second, if we violate the regulations, we could become excluded from participating in government contracts. This would mean that we cannot process claims to government payers or do business with other providers with government contracts. Other potential consequences include but are not limited to criminal prosecution, substantial fines, and suspension on new business for our Company.

Third, having a compliance program is the right thing to do. It demonstrates our commitment to the highest degree of business integrity that is expected of companies and participants in local, state, or federal programs.

## Seven Elements of an Effective Compliance Program

Centria’s Compliance Program is modeled after the outline of the Federal Sentencing Guidelines. By successfully following the Guidelines, companies accused of criminal conduct can substantially reduce any federal fines or penalties that may be imposed.

In 1991, the Federal Sentencing Guidelines for Organizations outlined corporate guidelines for an effective compliance and ethics program. More recent updates to the Guidelines detail how organizations should promote a culture that encourages ethical conduct.

Based on the Federal Sentencing Guidelines, the Office of Inspector General for Health and Human Services has outlined Seven Elements of an Effective Compliance Program. Those elements are:

## 1. Standards of Conduct

Centria's Code of Conduct provides employees with guidance on appropriate workplace behavior and describes how to submit reports regarding workplace practices that may violate Company policies. Each employee should receive a copy of the Code of Conduct during the new-hire process. It is also available on the PULSE as well as Centria's public website. We will discuss the Code in more detail later in this Manual.

Although our Code of Conduct applies to all of Centria's different services and supports, it does not replace the Company's operational policies and procedures. Employees must still be familiar with these policies and procedures. Employees can access the Corporate Compliance Department's policies and procedures by using the links provided in Appendix A of this Manual.

## 2. Oversight

Centria has a Chief Compliance Officer who reports directly to the CEO of the Company. The Chief Compliance Officer also reports to the Compliance Committee of Centria's Board of Directors. Centria employs a team of compliance professionals that are available to assist employees with their compliance concerns.

## 3. Education and Training

Employee education is also a key element of Centria's Compliance Program. To have an effective program, employees must be educated about the role and functions of a company compliance program. This involves teaching employees how to resolve unclear situations properly by referring to the Code of Conduct, policy manuals or contacting the appropriate individuals in the Company. Centria provides compliance training to employees at the time of hire and throughout their employment as required.

## 4. Auditing and Monitoring

For a Compliance Program to be effective, both old and new procedures and systems must be reviewed on a regular basis. Within the Corporate Compliance Department, the Internal Audit Team has primary responsibility for monitoring and auditing Centria's business processes.

## 5. Reporting Process

A critical element of Centria's Compliance Program is the compliance reporting process. Employees are encouraged to first report their concerns to their supervisor using the local chain of command. However, if this does not provide the assistance needed or the issue continues, then employees can contact the Compliance Team for assistance. For issues that are not compliance-related, Compliance Services may re-direct communications so that the appropriate people receive the information.

To report a compliance concern, employees may email the Corporate Compliance Department at [CorporateCompliance@centriahealthcare.com](mailto:CorporateCompliance@centriahealthcare.com). We will discuss the employee reporting requirements in more detail later in this Manual.

## 6. Response and Prevention

To demonstrate program effectiveness, Centria's Corporate Compliance Department investigates reported issues objectively and with respect for all parties.

All allegations will be taken seriously, but maliciously false accusations and/or repeated misuse of the compliance reporting process will be addressed through corrective action.

When a violation is found, the Corporate Compliance Department will continue to monitor the matter's resolution to ensure corrective measures have been taken to prevent future recurrence of the violation.

## 7. Enforcement and Discipline

Centria believes that employee discipline should be fair, consistent, and appropriate. Effective compliance programs ensure that employees who commit similar offenses receive similar corrective actions.

### Code of Conduct

Centria's Code of Conduct was created to set standards of conduct and to summarize basic legal principles and policies for employees. It provides guidelines and direction on how to identify a compliance issue and how to raise questions or report workplace practices that may violate company policies or procedures.

In 2021, Centria revised the company's Code of Conduct for its workforce. The Code of Conduct outlines and establishes Centria's standards for honest and ethical business conduct and workplace behavior. Although the implementation and enforcement of the Code of Conduct and Compliance Program is directed by the Corporate Compliance Department, *every member of Centria's workforce is responsible for ensuring compliance*. All employees must abide by the standards set forth in the Code of Conduct.

Click on this link to Centria's [Code of Conduct](#) to access, view, or save it to your computer or mobile device.

## Compliance Guidance for Centria's Workforce

### Service Documentation

Every day, Centria employees provide essential services to clients that will help them reach their highest level of independence. As a result, timely and complete documentation is required to receive payment for the important services that we provide. Service record documentation, which is a collection of information about persons receiving services, is both a confidential and legal record of services provided by our employees. These records should contain facts and observations about clients including past and present services, assessments, referrals, interventions, and outcomes.

It is not possible to provide a complete list of things that must be documented in every situation or for every type of service. However, there are a few standard documentation principles that apply in nearly every situation. For instance, if a service note was not completed, then we will not be able to bill or collect payment for the service - it is just like the service never happened. If the service was recorded incorrectly, then it happened incorrectly. Funding sources, auditors and investigators will want to see records which demonstrate timely service to clients in compliance with the regulations and our contract requirements. With this in mind, our service documentation must be:

- Factual - Documentation should reflect the things you do, see, or hear. Our narratives should focus on the facts and avoid unnecessary opinions. For instance, we should avoid writing, "Jane was lazy today." Instead write, "Jane had trouble focusing and following directions to complete trials. She required several prompts to remain on task."
- Timely - The most accurate service notes are those recorded or written fairly soon after interacting with clients, preferably as you are performing the service or before the end of your shift. Service progress notes should be completed within the timeframe as stipulated in Centria policy.

- Accurate - Notes should reflect the exact start and stop time of each session and the location where the service was provided. If you arrive late for your shift, the start time should reflect the time you started working with your client and not the time you were supposed to start your shift. If your session ends early, the session end time should reflect the exact time your session ended and not the time the session was supposed to end.
- Complete -- Do not leave any section blank, even if it does not seem to apply to your assignment or the person receiving services - you can always write, "Does not apply" or "N/A" in these situations. If you abbreviate, make sure it is a standard abbreviation with no possibility of having more than one meaning.
- Consistent with legal, contractual, and regulatory requirements - The services we provide should match the goals outlined in the Treatment Plan. It is required that employees provide original and unique documentation and avoid "cookie cutter" entries. Rather, notes should provide detail to show the individualized nature of the services provided.

Under all circumstances, employees should NEVER:

- Enter service notes that suggest an individual received services that were never provided;
- Document services were provided in a way that is different than the way they were actually provided;
- Document a service before it was actually provided;
- Fail to record an accurate date/time/signature/job title for your service notes;
- Record therapy session time while transporting a client to or from a therapy location;
- Provide opinions without facts or outcomes for an individual receiving our services;
- Tamper with a service record by adding, removing, or changing existing documentation.

#### Accounting for Time Worked and Time of Service

Service documentation should reflect the exact start and stop time services are provided to the client. Employees should not "round" time to the closest billable unit or add service times together that were separated by a non-billable break in services - this is something our billing staff will handle in accordance with the rules outlined in the payer contract. Properly recording service time may result in additional time that you worked that is not reflected in the service documentation. Time worked that is not direct services should be documented through Centria's timesheet process.

For example, you may be asked to pick up a client at home for transportation to/from a center location. The drive time to/from the center should NOT be included as service time with the client. The transportation time would be considered time worked and you will be paid for this time, but it should not be included in the session time you enter in your iPad.

#### Reporting Errors in Service Documentation

If you realize your service documentation did not reflect the correct time, date, or services you provided to your client, please take immediate action by notifying your supervisor. Your supervisor will provide guidance on next steps for correcting the issue. If the service has already been billed to a payer source, the issue must also be reported to the Corporate Compliance Department for review ([CorporateCompliance@CentriaHealthcare.com](mailto:CorporateCompliance@CentriaHealthcare.com)).

If the Corporate Compliance Department initiates an investigation involving inaccurate time reporting, Centria requires all employees to be honest and forthcoming with any errors or inaccuracies that have occurred. Though an

investigation may result in an employment action, there are other legal consequences that can occur if you are not truthful regarding your actions, including the loss of one's license or certification and/or criminal charges.

## Fraud Prevention

There has been an increase in new legislation related to false claims and health care fraud enforcement. This section of the Manual highlights Centria's efforts to prevent fraud, waste and abuse of the government resources that fund many of the services we provide. We will also discuss our efforts to prevent the waste and abuse of company resources as well as those of individuals who receive our services.

### What is Fraud?

Fraud and related misconduct involve a deliberate act or a deliberate failure to act with the intention of obtaining an unlawful or unfair advantage. This can include:

- Bribery and the illegal giving or accepting of gifts;
- Stealing of funds, supplies or other assets;
- False statements on documents;
- Illegal actions by clients, vendors, or other related parties.

### Federal and State Laws

Perhaps you have heard newscasts that discussed details of an employee or former employee "blowing the whistle" on some illegal or inappropriate actions of his/her company or former company. The Federal False Claims Act (FCA) is also known as "The Whistleblower Act" because it authorizes private individuals to file whistleblower lawsuits on behalf of the government against those who make false claims for payment. This law protects those who file "good faith" complaints and provides penalties for those who file frivolous or harassing lawsuits. In addition, some states have their own false claims laws that meet or exceed the federal law. A list of these laws for the states in which Centria operates has been provided in Appendix B of this Manual.

For many years, prosecutors have used the False Claims Act to combat fraud in cases in which the delivery of health care services does not meet federal and/or state regulatory requirements. Recently, new federal and state laws have been enacted that strengthen the False Claims Act and address other types of fraud including:

- Failure to repay government overpayments in a timely manner;
- False claims made by a company's contractors or subcontractors.

All Centria employees, as well as our contractors who provide Medicaid covered services, must receive a copy of our [Fraud Prevention Policy](#). Workforce members can access and download this policy by clicking above or by accessing the Corporate Compliance link on Centria's public website.

### Employee Rights and Protection

Employees have a responsibility to report concerns about actual or potential misconduct either witnessed or suspected. Both direct and anonymous reporting mechanisms are available to all Centria employees to assist in meeting this responsibility.

Centria's [Prohibition of Retaliation for Reporting Compliance Concerns Policy](#) protects employees, who in good faith, report known or suspected instances of inappropriate business conduct or activities that violate local, state, or federal regulations or the Company's Code of Conduct. Management, supervisors, or other employees are not permitted to

engage in retaliation, retribution or any form of harassment or discrimination directed towards an employee who reports a good faith compliance concern. Any member of Centria's workforce who experiences retaliation as a result of their reporting responsibilities should immediately report the matter to the Corporate Compliance Department.

Compliance reporting processes are NOT intended to replace your local supervisor or existing channels for reporting workplace incidents, conflicts with co-workers or employment-related concerns. These matters should be reported to your supervisor, operational management, or Centria's Human Resources Department in accordance with Company policies and procedures.

Any person who purposely reports false information or attempts to settle personal grievances by making false reports or repeating reckless gossip will be subject to corrective action.

### **Centria's Fraud Prevention Initiatives**

Centria is committed to preventing fraud, waste or abuse of resources belonging to the company or individuals we support. Employees should disclose their own errors immediately after discovery. However, employees should not conduct their own investigations, but should report concerns to their supervisors and the Corporate Compliance Department.

Investigators have full access to all Centria records and grounds, and they have the authority to review all company property, including physical files or computer storage. Investigators can gain access without prior knowledge or consent of the employee whose file is being reviewed. Confirmed incidents of fraud are reported to executive leadership, including the General Counsel and Board of Directors.

Immediate disclosure of discovered errors helps to ensure that the company does not unintentionally bill for services it has not provided. Employees should refer to Centria's [Fraud Prevention Policy](#) for further details regarding the company's fraud prevention procedures and fraud detection tools.

### **Best Practices for HIPAA Compliance**

All Centria employees receive training on the Health Insurance Portability and Accountability Act, or "HIPAA" as it is commonly called. It is important for employees to periodically review the basics of the law and some of Centria's best practices for HIPAA compliance. There are several key things that all Centria employees should know and do about HIPAA as they perform their job duties. For detailed guidance, employees are encouraged to review Centria's policy on [Permitted Uses and Disclosures of Protected Health Information](#).

Under HIPAA, Centria and its employees have an obligation to safeguard the protected health information (PHI) of the people who receive our services. *PHI is any medical or behavioral health diagnoses, clinical assessments, treatment progress notes, testing results or any other information related to our clients' past, present or future health or health treatment services.* PHI is also information that individually identifies a person who receives our services, such as their name, DOB, address, or photo. In fact, HIPAA outlines eighteen (18) specific client identifiers that are considered PHI. While you do not have to memorize all of them, it is important to remember that information can still be PHI even when a client's name is never listed or shared.

The following are some best practice tips that can assist in protecting PHI:

- Do not access any Centria client's PHI unless you need it to perform your job;
- Do not discuss Centria clients outside of your paid work setting or work-related activities;



- Do not leave PHI unattended so that others can view it. Cover any papers or notes and lock your computer screen when you walk away from your work area. Secure electronic devices (iPad, iPhone, USB drives, etc.) when not in use. PHI in any format should be maintained in a locked drawer or cabinet when you end your workday. If traveling with PHI in your vehicle, it should always be concealed during transport and locked away or taken with you when you exit the vehicle. Employees should not leave electronic devices in their vehicle overnight;
- Secure any PHI you have on personal devices. It is not a violation to access client information on a personal device (such as a mobile phone, laptop, or home computer), but employees should avoid storing clients' PHI on personal devices whenever possible. If you need to download or save PHI on your personal device to perform your job duties, you must also take adequate steps to keep the PHI secure;
- Permanently delete the PHI from your device when it is no longer needed. Creating and requiring an access password or PIN for your device is an easy way to secure confidential information. Some mobile devices allow users to set a passcode or require facial recognition to access specific notes or files. In addition, employees should avoid using client names or other identifiers in their device contacts or address book. You should also refrain from taking or saving photographs of your clients with your personal devices.

If you are not sure if a person is authorized to have a client's PHI or you do not know who the person is, contact your supervisor or the Corporate Compliance Department for direction before sharing any information.

While there are circumstances where PHI might be shared with others without first getting a parent or guardian's consent, those situations are rare. The list below includes the most common or likely reasons this might occur:

- Payer audits or oversight agency investigations;
- Subpoenas or court orders;
- Police, EMS, or hospital staff to assist a client who has a medical emergency; and
- Reports of abuse/neglect to the appropriate agencies, such as Recipient Rights or Child Protective Services.

When PHI is disclosed in one of the above situations, employees must document the disclosure and keep a record of it for six years. If you have questions about whether to disclose information in a particular situation, please consult your supervisor or Centria's Corporate Compliance Department.

In 2009, the Health Information Technology for Economic and Clinical Health Act (commonly known as "HITECH") placed additional requirements on companies who fail to protect their clients' PHI. Whenever PHI is accessed, used, or disclosed improperly, this results in a HIPAA *violation*. A serious violation involving a client's personally identifiable information or other PHI is known as a HIPAA *breach*.

If you believe a HIPAA violation may have occurred, you are required and responsible for immediately reporting the issue to your supervisor and the Corporate Compliance Department. Time is of the essence – if it is ultimately determined that a breach of PHI has occurred, Centria has a limited time to send out the required notification letters to those who were impacted by the breach. Failure to meet these timelines can result in severe civil and criminal penalties for both the Company, and in some cases, our individual employees.

The organization that oversees HIPAA compliance is the Office for Civil Rights (OCR). The OCR understands that a breach of PHI can happen due to common errors or simple mistakes. While we should always strive to protect our clients' PHI, it is a far greater error to ignore a potential violation or to fail to report it. The most severe penalties on

companies relate to the failure to report a breach or the failure to take steps to correct or minimize the risks associated with it.

We can all work together to keep our clients' information safe and secure. Failure to follow the best practices outlined above does not necessarily mean a violation or a breach has occurred, but following these tips reduces the risk that one will. Above all, please keep the following simple messages in mind:

1. Use PHI for legitimate work purposes only;
2. Always keep PHI private and secure;
3. When finished, delete electronic PHI from personal devices and return paper PHI to Centria for proper storage or disposal;
4. Encourage other team members to do the same.

## Conflicts of Interest

Employees are obligated to conduct Centria's business in an honest and ethical manner. This includes the ethical handling of actual or apparent conflicts of interest between personal and professional relationships.

A conflict of interest occurs when an employee's personal or private interests interfere in any way with the interests of Centria. A conflict of interest may also exist if the demands of any outside activities distract you from the performance of your job or cause you to use Centria's resources for a non-Centria purpose.

Examples of conflicts of interest include, but are not limited to:

- Personal or family financial interests in an enterprise that has business relations with Centria;
- Receiving improper personal benefits as a result of one's position with the company;
- Ownership by a workforce member of a significant financial interest in any actual or potential competitor or third party;
- Performing services for any actual or potential competitor or third party without approval of Centria management;
- Engaging in outside business activities that detract from or interfere with your responsibilities to Centria or our clients;
- Serving on a public body or in an organization whose interests may limit or interfere with Centria's business interests;
- Using work time or Centria resources in pursuit of personal activities which interfere or compete with Centria's business;
- Accepting or providing gifts to/from clients or their family members, as well as selling, buying, or lending items to clients or their family members;
- Purposefully offering or paying remuneration to induce or influence referrals for services payable by any federal healthcare program.

You must remain free of conflicts of interest for the proper performance of your job responsibilities. Employees should not engage in any activities that conflict, or might appear to conflict, with the interests of Centria or its subsidiaries.

Employees should notify Centria's Corporate Compliance Department of any information about any actual or apparent conflicts of interest involving employees or others with respect to the Company.

## Maintaining Professional Boundaries with Individuals Receiving Services

Boundaries help clients feel safe and help establish relationships built on trust and confidence in the skills and expertise of the Centria employees who support them. It is important to always remember that Centria's employees, not our clients or their family members, are ultimately responsible for maintaining professional boundaries. At the onset of a relationship with a client, an employee can define boundaries and create a safe environment by explaining his/her role and responsibilities to the client and client's family members. An employee's focus must always remain on the client and should never shift from the client's needs to the employee's own needs.

To maintain professional boundaries, employees should avoid the following behaviors:

- Over-sharing personal information: Any personal information that an employee shares with a client or client's family members should be provided for the client's welfare and related to the client's goals - for example, a personal story that demonstrates an example or teaches a lesson related to the client's situation. Employees should not share personal information because they need someone to talk to or need someone to help them feel better. Employees should also never discuss negative feelings about their jobs, the Company, or co-workers with clients or their family members. Employees should not interact with clients or their family members through social networking (such as "friending" a client on Facebook or tagging them in posts). If an employee is unsure whether personal information will benefit a client, then he/she should take the cautious approach and not share the information.
- Borrowing or accepting money or personal property: Employees should never have any type of personal gain at the expense of a client, even when doing so is the expressed wish of the client or client's family members. Clients or family members may want to "help out" an employee by loaning a car or money to pay bills, or they may offer to "sell" an employee something he/she needs at a price far below reasonable value or on "credit" until the employee can afford to pay. Taking advantage of these situations puts the employee's interests above the client's and diverts focus from the client's needs.
- Over-involvement with a client: Sometimes good intentions can lead to crossed professional boundaries. At times, employees may feel especially protective of or responsible for a particular client. However, as professionals, employees must ensure that they are not becoming too personally involved with their clients. Over-involvement occurs when employees offer to assist a client outside of their job-related role. Some examples include babysitting a client, lending money to a client or family member, providing transportation for non-treatment activities, or believing that no one else can truly meet the client's needs. These types of things indicate over-involvement with a client or his/her family.
- Developing a personal relationship with a client: While employees should be friendly with clients, they should not be friends with them. Social relationships with clients and/or their families violate professional boundaries. Engaging in any type of physical or sexual relationship with clients or their family members is always inappropriate. In addition, visiting a client when off-duty, engaging in personal phone calls or texts, and communicating through social media (such as Facebook, Instagram, Snapchat, TikTok, etc.) are also violations of professional boundaries and Centria's policies. Furthermore, employees should always inform their

supervisor before providing any services to an individual with whom they have a previously established personal, social, or family relationship.

- Showing favoritism: While it is human nature to prefer some people over others, in the type of work we do at Centria, avoiding favoritism is critical. Special favors, gestures or personal gifts provided to some clients and not to others may create disappointment and resentment in those clients who do not receive the same special attention. This can cause our clients to no longer view their service provider as objective. Furthermore, employees should also avoid creating nicknames or using terms of endearment with clients (such as “Baby” or “Honey”) because these actions might suggest favoritism or might offend those receiving our services.

Of course, many other behaviors may also cross professional boundaries. The examples above are provided to illustrate boundary issues, but they are not all-inclusive of professional boundary violations. Employees should always use common sense in interactions with clients and should ask themselves these questions before engaging in any behavior:

- Is this behavior in line with Centria’s policies and Code of Conduct?
- Does this behavior show respect for the client’s rights?
- Is this behavior in the client’s best interest?
- Does this behavior meet the client’s needs?
- Would I engage in this behavior with all other similar clients?
- Would I feel comfortable talking with my supervisor about this behavior?

If the answer to any of these questions is “no,” the employee should not engage in the behavior. Employees with questions or concerns about professional boundaries should speak with their supervisor, HR Representative, or a member of Centria’s Corporate Compliance Department.

## Managing Gifts or Gratuities Involving Clients and Outside Parties

Centria employees who provide services to our clients are our first representatives and have direct access to clients and family members who are grateful for our employee’s hard work and dedication. Occasionally, a client or family member wants to show their gratitude with a gift or some type of gratuity. While employees are welcome to accept and express verbal gratitude, it is against our policy to accept gifts, cash, or services from our clients. It is also against our policies to give personal gifts, cash, or personal services to our clients.

### Gifts to or from Clients, Family Members, or Guardians

Centria PROHIBITS employees from accepting money or gifts from individuals we serve, their family members, or guardians. This includes loans of money or the temporary use of personal property belonging to a client or family members. Employees should make clear that compensation (of any type) for services provided to the person served is limited strictly to the financial agreement established in the contractual agreement or authorized services from funding source / insurance. If employees receive a gift or are asked to accept a gift, they must report it immediately to their manager/director.

Centria recognizes that there are certain exchanges between an employee and a client that are part of the client’s treatment plan or a natural part of building a trusting, therapeutic relationship. Typically acceptable exchanges between an employee and a client would be:

- Giving educational or treatment-related items of minimal value (\$10 or less) that directly relate to the client's treatment plan;
- Accepting personal or handmade items with no applicable market value;
- Offering/accepting modest refreshments (such as a bottle of water, coffee, soft drink, snack item, etc.) directly before, during or immediately following a provided service.

For example, a parent makes cookies during a home session and offers one to you. You could accept or decline based on your preference. However, taking home a batch of cookies for yourself and your family would not be acceptable. Taking a cookie without being offered would also be unacceptable, even if the parent had told you to help yourself to as many as desired.

While the specific exchanges highlighted above may be allowable under Centria policy, all licensed and certified employees are expected to abide by the ethical code and standards of their profession and licensing body. When this may differ from Centria policy, the more stringent requirements should be followed.

### Gifts or Gratuities

Employees may provide or accept an occasional gift of nominal value (sometimes known as "swag"), an inexpensive meal or a social invitation from outside parties provided it is:

- Legal;
- Infrequent in nature;
- In conjunction with an educational or business function;
- Consistent with industry and company practices;
- Not likely to be perceived as an attempt to improperly influence referrals or business decisions ("inducement").

It is always best to check with your supervisor and the Corporate Compliance Department prior to offering or accepting any gift from a payor, referral source, vendor, or another service provider.

### Communicating with Clients

Centria's standard and accepted ways to communicate with clients include person-to-person phone calls, secure (encrypted) email, or U.S. Mail. It may be necessary, from time to time, to communicate with clients by your personal cell phone or other personal electronic device. You will find detailed guidelines for use of personal devices in Centria's policy for [Business Use of Personal Mobile Devices](#).

In an earlier section of this Manual, we learned that HIPAA outlines eighteen (18) specific client identifiers that are considered PHI. For this reason, it is difficult to communicate with a client without including some form of PHI - in fact, a person's email address or phone number used to establish the communication is itself a form of PHI. Therefore, it is important that employees use secured methods of communication to avoid potential HIPAA violations. Company-owned devices, including iPads and cell phones, typically use encryption to secure the transmission of PHI. On personal devices, the use of Centria's cloud-based applications can also prevent unauthorized access to PHI by outside parties. Generally speaking, employees may phone a client to discuss information that includes PHI since voice calls are considered a secured method of communicating.

Employees must understand that standard text messaging is not secured. Most common email accounts that are available to the general public, such as personal Gmail, Hotmail, or Yahoo accounts, are not secured either. If a client

wishes to communicate by an unsecured method, such as texting, the client must provide written consent to Centria. The requirements for giving this consent are found in Centria's [Confidential Communications by Alternative Means Policy](#) and its associated form, [Request for Confidential Communication by Alternative Means](#). Employees must have the client fill out this form prior to engaging in any unsecured electronic communications such as text messaging or non-secured email. Once the signed form is obtained from the client or his/her guardian, employees must still take care to avoid the use of PHI when using unsecured methods of communication. For example, a technician can say, "Hi, this is John. Please call me as soon as possible," or "I need to reschedule my evening visit." Avoiding the use of a client's name, address, or any other identifying information, including references to Centria or a client's condition or treatment services, is a good rule to follow when texting a client or his/her family member.

## Communicating with Outside Agencies

Employees may exercise their rights and responsibilities to directly contact any regulatory authority, government agency or entity to report possible violations or make other disclosures required by law. However, reports such as these are not a substitute for Centria's internal reporting requirements. Later in this Manual, we will outline Centria's internal reporting requirements in more detail.

The Corporate Compliance Department is available to assist employees with their communications to outside agencies and to ensure that employees meet any legal requirements related to mandatory reports or disclosures. If any member of our workforce receives a subpoena, notice or letter related to a government investigation or request for information involving Centria, the recipient must immediately notify Centria's Corporate Compliance and Legal Departments. Subject to coordination by General Counsel, Centria will disclose information required by government officials, supply payment information and provide information on subcontractors. Centria will also grant authorized federal and state authorities with immediate access to the facility and its personnel. All employees and contractors who provide items or services in connection with the Medicaid/Medicare program are required to comply with Centria's policies on responding to investigations. Contractors must immediately furnish General Counsel or the authorized government officials with information required in an investigation.

When responding to an investigation, it is important to remember that workforce members are not permitted to alter, remove, or destroy documents or records belonging to Centria or its clients. Failure to comply with these requirements will result in disciplinary actions and could result in significant sanctions for both the individual and Centria.

## Client Transportation

To maintain the safety of our clients and workforce, employees must understand and follow Centria's [Client Transportation Policy for Autism Services](#) and/or [Client Transportation Policy for Healthcare Services](#) policies and procedures prior to transporting any client in a personal vehicle. A brief summary of these policies is provided below: [ABA Services](#)

The transportation services will only be provided from permitted points of origin to/from the location of the Centria ABA therapy services as follows:

- An active (established) client is permitted to be transported from/to permitted points of origin, which include, for example, home, school, a family's member's home, Centria Clinic location or other location approved by a supervisor;
- The transportation services will only be provided if the client's point of origin is within 50 miles of the location of the Centria ABA therapy services.

### Healthcare Services

The transportation services will only be provided from permitted points of origin to/from the location of a medically necessary service provider as follows:

- An active (established) client can be transported from permitted points of origin (for example - home, school, a family's member's home, etc.) to/from the location of a medically necessary service provider (for example - doctor appointments, therapy appointments, pharmacies, etc.);
- The transportation services will only be provided if the client's point of origin is within 50 miles of the location of the medically necessary service.

To obtain authorization to transport clients, Behavior Technicians, HPFS or any other members of Centria's workforce providing transportation must agree to and adhere to the following requirements:

- A Transportation Attestation Form signed by the workforce member agreeing to abide by all of Centria's transportation requirements must be on file prior to transporting any clients;
- A Centria Consents + Waivers Form must be on file, evidencing that the parent or guardian of the client has authorized transportation for the client;
- The workforce member must have a valid driver's license;
- The workforce member must have current automobile liability insurance in his or her own name;
- The workforce member must use his or her own personal vehicle (not commercial or borrowed);
- The workforce member must maintain vehicle safety, upkeep, and cleanliness;
- The workforce member must ensure that seatbelts are used by the driver and all passengers during transport. This includes proper installation and use of any child car seats or booster seats as required by state law;
- The workforce member must follow all applicable driving and safety laws while transporting clients. The workforce member will be responsible for all tickets and moving violations incurred while transporting clients;
- The workforce member is strictly prohibited from transporting a client to the workforce member's home or running personal errands during the transport of the client; and
- Therapy time may not be billed while driving clients. Billing for therapy may only commence upon arrival to the therapy location. This means that transportation time cannot be listed/billed as therapy time.

Note: If there are two members of Centria's workforce in the vehicle and an approved transportation therapy program is documented in the treatment plan, there may be some therapy services rendered; however, this must all be pre-approved and authorized with the payer.

If at any time, a workforce member is unable to uphold the requirements set forth in Centria's Client Transportation policies, he or she has an affirmative duty to notify Centria immediately and cease transporting clients.

Any misrepresentation of billed therapy time, or documentation involved in the transportation of clients will result in disciplinary action up to termination of employment.

## Compliance Reporting Requirements

As part of Centria's Compliance Program, every employee is required and has the affirmative duty to internally report any actual or potential violations of the law, regulations, or any other compliance-related concern. This responsibility includes any violations that employees directly observe or suspect based on things they have heard or were reported to them.

When situations like this occur, Centria expects you to report these things through the appropriate Compliance Program channels. Failure to report potential violations is a serious matter, and it can lead to disciplinary action, including potential termination of your employment.

### Identifying Compliance Issues

A compliance issue is an action that includes possible or actual violations of the law or regulations that apply to the services we provide, or an action that violates Centria's Code of Conduct. Some examples of compliance issues are the falsification of time reports or service documentation and the misuse of company or client property. Other examples include HIPAA privacy breaches or billing for services that were not performed.

When identifying a potential compliance issue, you should ask yourself the following questions:

- Is the action legal?
- Is the action ethical?
- Is the action supported by Centria's Code of Conduct?
- Is the action supported by company policy?
- Is it the "right thing" to do?

If your answer to any of these questions is "No" then you must report the issue to Centria's Corporate Compliance Department.

The following are examples (but not a complete list) of situations that an employee or supervisor would be required to internally report to the Corporate Compliance Department:

- An employee billing for services when they did not provide them;
- An employee misrepresenting services provided (including the time spent providing the services);
- Any suspected physical, verbal, or mental abuse of a client or another employee by an employee;
- Falsification of documentation related to any service or other entry into a person's medical record;
- Theft of company property and material, including anything that is considered confidential information;
- Inappropriate conduct in the workplace;
- Notice of a government or outside agency investigation or inquiry;
- Any violation of a law/regulation or contractual requirement by a Centria employee while on duty or at any Centria-sponsored event;
- Any event or non-public information that is likely to cause significant reputational or financial harm to Centria;
- Any threat of a lawsuit against Centria or one of its employees;
- Harassment or discrimination of an employee or any person receiving our services;
- Recipient Rights concerns or violations;
- Any person threatening to or making claims about any of the above.



It is critical that you make an internal report when required so that Centria can undertake a comprehensive internal investigation of the matter and take appropriate corrective action based on the results of the investigation

Employees may also encounter situations that are not compliance issues. Some examples include:

- Complaints about a coworker's attitude or behavior toward you or other employees;
- Complaints about a supervisor's style or behavior toward subordinates;
- Payroll or scheduling problems;
- Personal issues.

These concerns are not compliance issues, and they should be handled through your chain of command or by contacting Centria's Human Resources Department.

## Contacting Your Corporate Compliance Department

It is the responsibility of every Centria employee to report any potential compliance violation or misconduct that they believe to be illegal or unethical. An employee who makes a compliance report in good faith will be protected from retaliation or retribution from any member of Centria's workforce.

Employees can report a potential compliance issue in several ways:

- Send a confidential email to: [CorporateCompliance@centriahealthcare.com](mailto:CorporateCompliance@centriahealthcare.com). The Corporate Compliance email address is the quickest and easiest way to directly share your concern with the Corporate Compliance Department;
- Submit a report form through Centria's website: <https://www.centriahealthcare.com/submit-a-complaint-or-violation>;
- Call the confidential hotline at 1-866-842-7126. An outside vendor operates the Compliance Hotline, and it is available to employees 24/7. It is a good option for those who would like to remain anonymous.

When making a report by email, reporting form or the hotline, please provide a detailed description of the concern. This would include the location and any important dates, times, and names of those who are involved in the issue.

## Centria's Non-Retaliation Policy

Centria has a strict [Prohibition of Retaliation for Reporting Compliance Concerns](#) policy. Specifically, any form of retaliation against an employee for making a good faith internal compliance report is strictly prohibited, Retaliatory behavior or actions by any Centria employee should be immediately reported to the Chief Compliance Officer or other member of the Corporate Compliance Department.

## Review Process and Confidentiality

A Compliance Team member will review all reported issues to determine the best way to investigate the concern. Employees should not attempt to handle any suspected compliance issues on their own, including conducting their own investigation surrounding the issue or attempting to fix an issue on their own. Employees should not discuss an allegation or compliance concern with any employee other than their supervisor or Corporate Compliance Department staff. The Corporate Compliance Department will treat all internal reports confidentially to the extent reasonably possible.

## Reporting to Outside Agencies

Employees may exercise their rights and responsibilities to directly contact any regulatory authority, government agency or entity to report potential violations or make other disclosures required by law. Centria's reporting process is not intended to restrict, discourage, or interfere with communications or actions required or protected by state or federal law. However, reports such as these are not a substitute for Centria's internal reporting requirements. It is also necessary to report these matters through an appropriate internal reporting channel as well.

## Reporting Employee or Client Incidents

Sometimes incidents occur when we are providing services to our clients. Centria requires our employees to report incidents to their supervisor and to complete a Centria Incident Report form.

When completing an Incident Report form, employees should describe the incident using ONLY factual information that was directly observed or reported to the person completing the report. Employees should refrain from giving opinions or forming conclusions that are the responsibility of the person investigating the incident. Once completed, employees should email the form to the Process Compliance team, who will enter the documentation into Centria's Incident Tracking system and ensure the form is routed to the appropriate CMH/Payer as required by our contract. Sometimes incidents should also be reported to Centria's Corporate Compliance Department, especially if they involve employee actions that violate our policies or Code of Conduct. However, routine incidents such as unexpected client misbehavior, non-emergent medical treatment, non-injury vehicle accidents, and other types of environmental concerns or service interruptions do not require a report to the Corporate Compliance Department. Instead, these events or actions should be handled through Centria's established methods and channels for reporting such incidents.

## Reporting Suspected Abuse and Neglect

Centria does not tolerate abuse, neglect, or exploitation of the individuals we serve. If you are aware of any abuse, neglect, or exploitation of a Centria client, your obligation is to report it immediately to your supervisor and to the authorities as outlined in state law.

There are guidelines and time frames for reporting such incidents in each state, and it is very critical for you to follow the guidelines for your work location. If you are unsure of your mandatory reporting requirements, you may contact the Compliance or Legal Department for assistance.

Click on this link to Centria's [Internal Reporting Obligations, Investigations, General Communications](#) policy for more detailed guidance on workforce members' reporting requirements.

## Conclusion

In today's environment of increased scrutiny by regulatory agencies and the public at large, organizations must be prepared to demonstrate that they take compliance directives seriously. An organization's commitment to a culture of compliance can be key in preventing misconduct and reducing the number of penalties imposed when compliance violations are detected. Centria's Corporate Compliance Department is instrumental in ensuring an environment where the prevailing goal is to "do right" for the people we serve. Through the efforts of each of our employees, Centria will continue to demonstrate the highest degree of business integrity that is expected of the leading provider of autism services and private duty nursing care for children.

## Appendix A

### Compliance Program Policies and Procedures

Category	Policy Name
Compliance	<a href="#">Corporate Compliance Program</a>
Compliance	<a href="#">Fraud Prevention</a>
Compliance	<a href="#">Internal Reporting Obligations, Investigations, General Communications</a>
Compliance	<a href="#">Michigan Recipient Rights Reporting + Investigation</a>
Compliance	<a href="#">Prohibition of Retaliation for Reporting Compliance Concerns</a>
Compliance	<a href="#">Compliance Training for Centria Employees</a>
Compliance	<a href="#">Internal Audit</a>
Compliance	<a href="#">Overpayments and Credit Balances</a>
Compliance	<a href="#">Client Transportation Policy for Healthcare Services</a> <a href="#">Client Transportation Policy for Autism Services</a> <a href="#">Client Transportation Policy for LSAA</a>
Privacy	<a href="#">Permitted Uses and Disclosures of Protected Health Information</a>
Privacy	<a href="#">Minimum Necessary Requirement for Use and Disclosure of PHI</a>
Privacy	<a href="#">Designated Record Set and Legal Health Record</a>
Privacy	<a href="#">Client Access to Protected Health Information</a>
Privacy	<a href="#">Accounting for Disclosure of Protected Health Information</a>
Privacy	<a href="#">Breach Notification</a>
Privacy	<a href="#">Retention of Medical Records and Protected Health Information</a>
Privacy	<a href="#">Disposal of Protected Health Information</a>
Privacy	Right to Request Restriction of the Use and Disclosure of PHI
Privacy	Right to Amend Medical Record
Privacy	<a href="#">Prohibition of Information Blocking</a>
Privacy	<a href="#">Business Associates</a>
Privacy	<a href="#">Confidential Communication by Alternative Means</a>
Privacy	<a href="#">Social Media</a>
Privacy	<a href="#">Video and/or Audio Capture of Client Interactions</a>
Privacy	<a href="#">Business Use of Personal Mobile Devices</a>
Publication	<a href="#">Authorization to Disclose Protected Health Information Healthcare</a> <a href="#">Authorization to Disclose Protected Health Information Autism</a> <a href="#">Authorization to Disclose Protected Health Information LSAA</a>
Publication	<a href="#">Authorization to Release Protected Health Information Healthcare</a> <a href="#">Authorization to Release Protected Health Information Autism</a> <a href="#">Authorization to Release Protected Health Information LSAA</a>
Publication	<a href="#">Code of Conduct</a>
Publication	<a href="#">Centria Healthcare Notice of Privacy Practices</a> <a href="#">Centria Autism Notice of Privacy Practices</a> <a href="#">LSAA Notice of Privacy Practices</a>

## Appendix B

### False Claims Act by State

	STATE	STATUTE	OIG CERTIFICATION	REVIEW DATE
1	Arizona	No State FCA - Ariz. Rev. Stat. Ann. §§ 36-2918 and 36-2957; Ariz. Stat. Ann. § 13-2311; Ariz. Rev. Stat. Ann. §§ 38-531 to 38-532; Ariz. Rev. Stat. Ann. §§ 23-1501 to 23-1502; Ariz. Rev. Stat. Ann. § 12-2-510	No	NA
2	California	State FCA - CA Govt. Code § 12650 - 12656	YES	1/25/2019
3	Georgia	State FCA - Medicaid Only) O.C.G.A. § 49-4-168.1 - 168.6	YES	1/25/2019
4	Indiana	State FCA - Ind. Code §§ 5-11-5.7-1 through 5-11-5 -7-18	YES	12/28/2016
5	Maryland	State FCA - (Medicaid Only) Md. Code Ann. Health-General Title 2 § 2-601 (2014); (all other state claims) Md. Code Ann. Gen. Prov. § 8-101 et seq.	No OIG review	N/A
6	Massachusetts	State FCA - MASS Gen. Laws Ch. 12, §§ 5A-5O	YES	12/28/2016
7	Michigan	State FCA - (Medicaid Only) MCLS §§ 400.601 - 400.615	No	12/28/2016
8	Minnesota	State FCA - Minnesota False Claims Act, Minn. Stat. §§ 15C.01 through 15C.16	No	1/25/2019
9	New Jersey	State FCA - N.J. Stat. Ann. §§ 2A:32C-1-3	No	3/21/2011
10	New Mexico	State FCA - N.M. Stat. Ann. §§ 27-14-1 - 27-14-15	No	7/24/2008
11	North Carolina	State FCA - N.C. Gen. Stat. §§ 1-605-618; N.C. Gen. Stat. §§ 108A-70.10 to 70.16	YES	10/26/2018
12	Oregon	State FCA - ORS § 180.750-785	No OIG review	N/A
13	Texas	State FCA - (Medicaid Only) Tex. Hum. Res. Code Ann. §§ 36.001 - 36.132	YES	12/28/2016
14	Virginia	State FCA - Va. Code Ann. § 8.01-216.1 et seq.	YES	8/14/2018
15	Washington	State FCA - (Medicaid Only) RCW § 74.66.005 et seq.	YES	8/14/2018

## Appendix A Revision History

Revised On	Version	Description
06-Jan-2021	00	<ul style="list-style-type: none"> <li>Updated Attachment A statute information as needed.</li> </ul>

**Affirmation of Centria's Corporate Compliance Program\***

By signing below, I hereby acknowledge that I have received Centria's Compliance Program Manual, which includes direct access to the Centria's Code of Conduct and the Corporate Compliance Department's policies and procedures. I understand that I am responsible for reviewing this information and complying with all requirements of Centria's Corporate Compliance Program.

I further acknowledge that I have been given the opportunity to ask questions about the Corporate Compliance Program, and I have a responsibility to seek guidance if any further questions arise. I am aware that I may contact Centria's Corporate Compliance Department if I would like additional information or copies furnished to me.

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Signature

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Printed Name

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Date

\*A copy of this affirmation will be retained in signer's employment record.