

Threshold			
Subject:	Code of Ethical Conduct - Clinical	Section:	115
Revised:	Board Approval 6-16-08		

## POLICY

Threshold has developed a Code of Ethical Conduct in conjunction with the Standards for Ethical Conduct to provide guidance to Threshold personnel in carrying out their daily activities. Staff members sign a copy of the Code of Ethical Conduct upon hire as a part of orientation and these signed copies are retained in their personnel files. Copies of the Threshold Standards of Ethical Conduct follow this section.

### CODE OF ETHICAL CONDUCT PRINCIPLES

- A. Threshold personnel shall treat consumers and family members without discrimination and with respect, dignity and professionalism without regard to race, age, gender, religion, national origin, medical condition, physical or mental disability, ancestry, marital status, sexual orientation, citizenship, ability to speak English or status as a covered veteran.
- B. Threshold personnel shall adhere to all applicable standards of professional practice and ethical behavior in carrying out the business of Threshold and shall not feel forced to take part in unethical, improper or illegal conduct. Threshold employee and/or consumer grievance procedures will be used to investigate allegations of unethical behavior, as appropriate.
- C. Threshold personnel are encouraged to report their concerns if they believe that consumer care is at risk or the ethical and business standards defined in the Code of Ethical Conduct have not been met. There will be no retaliation against Threshold personnel who, in good faith, report suspected non-compliance or raise concerns about compliance issues.
- D. Threshold personnel shall follow program procedures in communicating questions, concerns or reporting suspected violations of Threshold Program or Code of Ethical Conduct. An individual may seek advice in a number of ways, including notification of a supervisor, the Corporate Compliance Officer/Quality Assurance Coordinator, the Executive Director or a member of the Board of Directors.
- E. Threshold personnel shall immediately communicate questions and concerns to a supervisor if Federal or State regulations or instructions are not clear. Threshold will seek assistance from federal and/or state government agencies, when necessary, to work collaboratively to clarify and revise policies, procedures, and instructions in order to prevent errors or mistakes.
- F. Since unintentional errors can occur in the normal course of doing business, it is the responsibility of Threshold to report, in a timely manner, any errors and to adjust reimbursements accordingly for those errors.

Threshold	
Subject: Code of Conduct - All Employees	Section: 116
Revised: Board Approval 6-16-08	

## STANDARDS OF ETHICAL CONDUCT

Employees must in all instances maintain their professional conduct at the highest standards. Official conduct guided by high ethical standards gives the public confidence in the integrity of Threshold programs and assures the public that Threshold is responsible to the people. The following standards of conduct are goals which employees should strive to attain so as to avoid even the appearance of impropriety in the conduct of the public's business.

- A. Employees shall strive to provide competent services to individuals seeking treatment through Threshold, Inc.
- B. Employees shall act in accordance with the ethics of his/her profession.
- C. Employees shall demonstrate compassion and respect for human dignity.
- D. Employees shall safeguard client confidentiality within the constraint of the law.
- E. Employees shall deal honestly with clients & fellow employees.
- F. Employees shall respect the law and also recognize the responsibility to seek changes in those requirements which are contrary to the best interests of the persons served.
- G. Employees shall not utilize their position with Threshold in such a fashion that would lead to personal financial gain above agreed-upon salary or compensation.
- H. Employees shall not utilize their employment with Threshold for the purposes of developing personal relationships with clients of the Threshold.
- I. Employees shall be obligated to respond to client emergencies in a manner that assists the emergency being brought to closure. Willful failure to respond to a client emergency will constitute client neglect and be considered misconduct.

## Code of Conduct Employee Agreement

All staff members of Threshold are expected to perform their duties in an ethical and professional manner.

I hereby affirm that:

I am committed to providing the highest quality service for those who seek my help.

I shall evidence a genuine interest in all customers, and do hereby dedicate myself to the best interest of my customers.

At all times I shall maintain a professional relationship with all persons served.

I shall maintain confidentiality of all records, material and knowledge concerning persons served of Threshold

I shall not in any way discriminate between consumers based on race, creed, age, sex, handicaps or personal attributes.

I shall respect the rights and views of other staff members.

I shall continuously strive for self-improvement.

I have an individual responsibility for my own conduct.

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Staff/ Member Signature

Date

Threshold	
Subject: Code of Conduct - Quality of Care	Section: 117
Revised: Board Approval 6-16-08	

## POLICY

- A. Threshold will provide quality services and assessment services in a manner that is appropriate and efficient.
1. All persons served and family members will be provided with quality services.
  2. Threshold recognizes the right of persons served and family members to make choices about their own care, including the right to do without recommended care or to refuse treatment.
  3. Threshold will inform consumers and family members about the alternatives for care if they are seeking treatment.
  4. Threshold personnel will follow current ethical standards in regards to communications with persons served and family members.
  5. Telephone crisis and information services shall be provided consistent with agency resources at no charge to the caller.

Threshold	
Subject: Code of Conduct Medical Necessity	Section: 118
Revised: Board Approval 6-16-08	

## POLICY

### A. Threshold, Inc. shall observe the following guidelines:

1. Threshold staff shall only request services that are medically necessary and consistent with generally accepted standards for diagnosis or treatment of related disease and are determined by a licensed professional to be medically necessary and appropriate.
2. In some cases, a health care professional may determine that services are medically necessary or appropriate, but the persons served may be unable to pay. The Executive Director shall receive information about the process for disallowed claims or uncovered benefits. Persons served may request services that are not covered benefits. Such services may be provided as long as the persons served has been given advance notice and has agreed to pay for the services or has completed the Reduced Fee Application. In these cases, the person served may request the submission of a claim for the services to protect his or her appeal rights with respect to those services or to determine the extent of the coverage provided by the payer.

Threshold			
Subject:	Code of Conduct - Coding, Billing and Consumer Accounting	Section:	119
Revised:	Board Approval 6-16-08		

POLICY

- A. Threshold personnel involved in the coding, billing, documentation and accounting for consumer services for the purpose of billing governmental, private or individual payers must comply with all applicable state and federal regulations.
1. Threshold will bill only for services actually rendered and shall seek the amount to which Threshold is entitled. Threshold will not tolerate billing practices that misrepresent the services actually rendered.
  2. Supporting medical documentation must be prepared for all services rendered. Threshold personnel shall bill on the principle that if the appropriate and required documentation has not been provided, then the service has not been rendered.
  3. All services must be accurately and completely coded and submitted to the appropriate payer in accordance with applicable regulations, laws, and contracts and Threshold policies and procedures.
  4. All person served shall be consistently and uniformly charged. Discounts will be appropriately reported and items and services consistently described so that comparability can be established among payers.
  5. Government sponsored payers shall not be charged in excess of the provider's usual charges.
  6. Billing and collections will be recorded in the appropriate accounts. Credit balances must be processed in a timely manner in accordance with applicable rules and regulations.
  7. Threshold personnel responsible for coding, billing and documentation should be knowledgeable about Threshold policies and procedures and about federal and state regulations regarding those activities. Threshold shall bill according to federal and state regulations and Threshold policies and procedures.
  8. Elective services that are not covered by governmental or private payer may be provided. However, before providing any elective services, the provider must inform the person served that these services may not be covered. The provider should obtain the agreement of the person served to pay for the services if payers deny the claim. A person served has the right to have a claim submitted even if services are excluded from coverage.
  9. An accurate and timely billing structure and medical records system is critical to ensure that Threshold personnel can effectively implement and comply with required policies and procedures. The Executive Director or other designated Threshold personnel should remedy demonstrated lapses in the information and billing systems in a timely manner.



Threshold	
Subject: Code of Conduct - Cost Reports	Section: 120
Revised: Board Approval 6-16-08	

## POLICY

- A. Threshold personnel who are responsible for the preparation and submission of cost reports must ensure that all such reports submitted to governmental and private payers are properly prepared and documented according to all applicable federal and state laws.
  1. In submitting and preparing cost reports, all costs will be properly classified and supported by verifiable and auditable cost data.
  2. It is Threshold policy to correct any cost report preparation or submission errors and mistakes in a timely manner and, if necessary, clarify procedures and educate employees to prevent or minimize recurrence of those errors.

Threshold	
Subject: Code of Conduct - Personal and Confidential Information	Section: 121
Revised: Board Approval 6-16-08	

## POLICY

- A. All efforts will be made to protect personal and confidential information concerning persons served. Consumer information shall be protected in conformity with Title 42, Code of Federal Regulations, Part 2: Federal Confidentiality Regulations.
1. Threshold personnel shall not disclose confidential information except with the persons served specific written consent and/or when authorized by law (see Program Manual). Confidential consumer information should only be discussed with or disclosed to appropriate Threshold personnel on a limited, "need to know" basis or in response to a legal or other authorized request.
  2. Confidential consumer information shall not be discussed with or disclosed to non-Threshold personnel unless authorized by the person served with a completed and signed Consent for Release of Confidential Information. Such authorization shall specify the exact nature of the information to be disclosed and the person or entity to which this information is to be provided (see Program Manual).
  3. Persons served can request and are entitled to receive copies or summaries of their records if it is appropriate as judged by their clinician and approved by supervisor.
  4. Full confidentiality procedures are detailed in the Threshold Program Manual, Confidentiality of Consumer Records which is hereby made a part of this Code.

Threshold			
Subject:	Code of Conduct - Creation and Retention of Consumer & Institutional Records	Section:	122
Revised:	Board Approval 6-16-08		

POLICY

- A. All consumer and institutional records are the property of the organization. Threshold personnel responsible for the preparation and retention of records shall ensure that those records are accurately prepared and maintained in a manner and location as prescribed by law and Threshold policy.
1. The complete and accurate preparation and maintenance of all records (logs, assessment records, accounting, electronic and paper) by Threshold staff are important for providing quality care and conducting the business of Threshold clinical enterprise. Accurate records are required in order for Threshold to retain licensure and accreditation.
  2. Threshold personnel will not knowingly create records that contain any false, fraudulent, fictitious, deceptive or misleading information.
  3. Threshold personnel must not delete any entry from a record. Records can be amended and material added to ensure the accuracy of a record. In such case, an indication must be made that the notation is an addition or correction and record the actual date that the additional entry has been made.
  4. Threshold personnel must not sign someone else's signature or initials on a record. Logging into the facility computer system with another's password is prohibited, even with permission, except for management, supervisory and audit purposes.
  5. Threshold records shall be maintained according to accepted standards and principles of the North Carolina Division DD/MH/SAS and applicable Threshold policies and procedures.
  6. Unless authorized by Threshold policy, personnel shall not destroy or remove any Threshold records from Threshold premises.
  7. Threshold record retention and record destruction policies and procedures must be consistent with Federal and State requirements regarding the appropriate time periods for maintenance and location of records. The premature destruction of records could be misinterpreted as an effort to destroy evidence or hide information. See document retention policy below:

## **Threshold, Inc Document Destruction Policy**

The Sarbanes-Oxley Act addresses the destruction of business records and documents and turns intentional document destruction into a process that must be carefully monitored.

Sarbanes –Oxley makes it a crime to alter, cover up, falsify, or destroy any document (or pressure someone else to do so) to prevent it from being used in an official proceeding. This policy is intended eliminate accidental or innocent destruction of documents. All documents will be retained per the following guidelines in order to be in compliance with the Sarbanes Oxley Act.

**The following table provides the minimum requirements.**

<b>Type of Document</b>	<b>Minimum Requirement</b>
Accounts payable ledgers and schedules	7 years
Audit reports	Permanently
Bank Reconciliations	2 years
Bank statements	3 years
Checks (for important payments and purchases)	Permanently
Contracts, mortgages, notes and leases (expired)	7 years
Contracts (still in effect)	Permanently
Correspondence (general)	2 years
Correspondence (legal and important matters)	Permanently
Correspondence (with customers and vendors)	2 years
Deeds, mortgages, and bills of sale	Permanently
Depreciation Schedules	Permanently
Duplicate deposit slips	2 years
Employment applications	3 years
Expense Analyses/expense distribution schedules	7 years
Year End Financial Statements	Permanently
Insurance Policies (expired)	3 years
Insurance records, current accident reports, claims, policies, etc.	Permanently
Internal audit reports	3 years
Inventories of products, materials, and supplies	7 years
Invoices (to customers, from vendors)	7 years
Minute books, bylaws and charter	Permanently
Patents and related Papers	Permanently
Payroll records and summaries	7 years
Personnel files (terminated employees)	7 years
Retirement and pension records	Permanently
Tax returns and worksheets	Permanently
Timesheets	7 years

Trademark registrations and copyrights	Permanently
Withholding tax statements	7 years

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Threshold	
Subject: Code of Conduct - Government Investigation	Section: 123
Revised: Board Approval 6-16-08	

## POLICY

- A. Threshold personnel shall cooperate with appropriately authorized governmental investigations and audits.
1. Should a representative from a federal or state agency contact Threshold personnel anywhere, such as at the office or at home, for information regarding Threshold, or any other entity with which the Threshold does business, the individual should contact the Executive Director immediately for guidance. If the Director is not immediately available, the individual should contact the Operations Manager.
  2. Threshold personnel should ask to see the government representative's identification and business card, if the government representative is there in person. Otherwise, Threshold personnel should ask for the person's name and office, address and telephone number, and identification number and then call the government representative's office to confirm his or her authority.

Threshold	
Subject: Code of Conduct - Preventing Improper Referrals or Kickbacks	Section: 124
Revised: Board Approval 6-16-08	

## POLICY

- A. Threshold personnel must not accept, for themselves or for the organization, anything of value in exchange for referrals of business or the referral of consumers or family members.
1. Threshold personnel must not offer or receive any item or service of value as an inducement for the referral of business.
  2. Federal law prohibits anyone from offering anything of value to a Medicare or Medicaid recipient that is likely to influence that person's decision to select or receive care from a particular health care provider.
  3. The following types of business arrangements must be reviewed and approved by one or more members of the Board of Directors to assure compliance with Threshold policies and federal regulations:
    - a. Pursuing joint ventures, partnerships, corporations.
    - b. Developing outside financial arrangements with current Threshold personnel.
    - c. Entering into an arrangement to lease or purchase equipment or supply items from a vendor.
    - d. Acquisition of other facilities or programs, clinical and ancillary services, or any other entities.

Threshold	
Subject: Code of Conduct - Adherence to Antitrust Regulations	Section: 125
Revised: Board Approval 6-16-08	

POLICY

Threshold, Inc. (Threshold) will comply with all applicable federal and state antitrust laws. Threshold personnel should not, for example, agree, or attempt to agree, with a competitor to artificially set prices or salaries; divide markets, restrict output, or block new competitors from the market; share pricing information with competitors that is not normally available to the public; or agree to or participate with competitors in a boycott of government programs, insurance companies, or particular products.

Threshold			
Subject:	Code of Conduct - Avoiding Conflicts of Interest and Self-Referral	Section:	126
Revised:	Board Approval 6-16-08		

POLICY

- A. All Threshold, Inc. personnel shall conduct clinical enterprise and personal business in a manner that will avoid potential or actual conflicts of interest.
- B. Threshold personnel shall not use their official positions to influence an organizational decision in which they know, or have reason to know, that they have a financial interest.
- C. Threshold personnel will be knowledgeable about those activities that may be an actual or potential conflict of interest. Examples of such activities may include, but are not limited to, the following:
  - 1. Giving to or receiving gifts, gratuities, loans, or other special treatment of value from third parties doing business with or wishing to do business with the organization. Third parties may include, but are not limited to, treatment programs, treatment providers, customers, persons served, vendors, suppliers, competitors, payers, carriers and fiscal intermediaries.
  - 2. Using Threshold facilities or resources for other than Threshold activities, unless expressly approved by the Board of Directors.
  - 3. Using the Threshold name to promote or sell non-Threshold products or personal services; and contracting for goods or services with family members of Threshold personnel directly involved in the purchasing decision.
- D. Threshold personnel who maintain a private practice shall not refer consumers seeking counseling services for either themselves or a friend or family member to their private practice.
- E. When a Threshold staff member receives a request from a consumer seeking referrals to substance abuse treatment services, the Threshold staff member shall provide the consumer with appropriate referrals. Threshold personnel shall always keep in mind the best interests of the consumer and shall not unduly promote referrals to any other organization where they are employed. Referral information on all referrals given may include the services provided, location and philosophy of treatment, etc. but shall not reflect the personal opinion or bias of the Threshold staff member.
- F. Threshold personnel should consult with the Executive Director of Threshold counsel prior to engaging in any activity that could raise conflict of interest issues.

Threshold	
Subject: Code of Conduct - Consumer Freedom of Choice	Section: 127
Revised: Board Approval 6-16-08	

## POLICY

- A. When referring consumers to treatment programs, treatment providers, self-help groups, or other services, Threshold personnel should respect the consumer's right to choose his or her own providers.
  - 1. Some healthcare plans limit the consumer's choice of provider, or pay less than the full cost of a provider. The consumer may choose a provider outside his or her health plan, but probably will have to pay for non-covered care.
  - 2. If the consumer chooses Threshold as their treatment provider, and their plan does not cover costs of service, the consumer should be fully apprised of the cost of treatment and shall receive an application for fee reduction.

Threshold	
Subject: Code of Conduct - External Relations	Section: 128
Revised: Board Approval 6-16-08	

## POLICY

- A. Threshold personnel shall adhere to fair business practices and accurately and honestly represent themselves and the organization's services and products.
  - 1. Threshold personnel will be honest and truthful in all marketing and advertising practices pertaining to the business practices of Threshold programs.
  - 2. Vendors who contract to provide goods and services to Threshold will be selected on the basis of quality, cost-effectiveness and appropriateness for the identified task or need.

Threshold	
Subject: Code of Conduct - Fair Treatment of Employees	Section: 129
Revised: Board Approval 6-16-08	

## POLICY

- A. Threshold prohibits discrimination in any work related decision on the basis of race, color, national origin, religion, sex, physical or mental disability, ancestry, marital status, age, sexual orientation, citizenship, or status as a covered veteran. Threshold is committed to providing equal employment opportunity and a work environment where each employee is treated with fairness, dignity and respect.
- B. Threshold will make reasonable accommodations to the known physical and mental limitations of otherwise qualified individuals with disabilities.
- C. Threshold does not tolerate harassment or discrimination by anyone based on the diverse characteristics or cultural backgrounds of those who work for the organization.
- D. Any form of sexual harassment is strictly prohibited.
- E. Any form of workplace violence is strictly prohibited.
- F. Threshold provides a number of ways for employees who observe or experience any form of discrimination, harassment or violence to report the incident. Reports can be made to the Executive Director North Carolina Equal Employment Opportunity Commission.

Threshold	
Subject: Code of Conduct - Consumer Rights	Section: 130
Revised: Board Approval 6-16-08	

## POLICY

- A. The following standards, as set forth in the Consumers' Rights section of the Medicare Conditions of Participation adopted by the Health Care Financing Administration on August 2, 1999, are made a part of this Corporate Compliance Plan as further indication of the importance of ensuring Consumer rights. The standards are intended to protect each consumer's physical and emotional health and safety when receiving direct clinical services from a health care facility and shall be adhered to as appropriate in delivery of clinical services by personnel of the organization.
1. The right of each person served to be notified of his/her rights, in advance of furnishing or discontinuing care;
  2. The right to participate in the development and implementation of his/her plan of care;
  3. The right to personal privacy, to receive care in a safe setting, and to be free from all forms of abuse or harassment;
  4. The right to confidentiality of clinical records and to access information contained in the records; and
  5. The right to be free from seclusion or restraints used in behavior management, unless clinically necessary.

