



LAKEMARY
CENTER

CORPORATE COMPLIANCE PROGRAM AND CODE OF CONDUCT PLAN

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Lakemary Center, Inc.

LAKEMARY CENTER, INC.

CORPORATE COMPLIANCE AND CODE OF CONDUCT PLAN

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INTRODUCTION

Lakemary is committed to conducting its business with integrity and in accordance with all federal, state, and local laws. Lakemary's policy is to prevent the occurrence of unethical or unlawful behavior, to halt such behavior as soon as reasonably possible after discovery, to discipline personnel who violate Lakemary policies (including individuals responsible for failure to detect violations), and to implement changes in policy and procedure necessary to prevent recurrences.

As part of its commitment to this policy, Lakemary has instituted a Corporate Compliance Program and a Code of Conduct. Their purpose is to prevent, detect, and discourage violations of the law, and to provide guidance to Lakemary and its employees and agents (persons or entities under contract with Lakemary) in resolving legal and ethical issues. All Lakemary personnel must comply with these policies.

The Corporate Compliance Committee (CCC) and the Corporate Compliance Officer (CCO) are responsible for implementing and monitoring the Corporate Compliance Program and the Code of Conduct. By formal resolution, the board of Directors has delegated overall responsibility for the Corporate Compliance Program to the President. The President has formally designated the Corporate Compliance Officer and assigned committee membership.

THE CORPORATE COMPLIANCE PROGRAM

The Lakemary Corporate Compliance Program is a confidential peer review process. The Corporate Compliance Officer oversees this process, and the Corporate Compliance Committee serves as the peer review committee. The Committee will meet at a minimum on an annual basis and more often as the need arises.

The Corporate Compliance Committee

The Corporate Compliance Committee, in cooperation with the Corporate Compliance Officer, is responsible for (1) implementing effective training about the Corporate Compliance Program and the Code of Conduct; (2) establishing effective lines of communication for clarifying policies and for reporting violations; and (3) enforcing the compliance program, the code of conduct, and all related policies and procedures. (See Appendix 1)

The Corporate Compliance Officer

The Senior Director of Corporate Compliance of Lakemary Center is the Corporate Compliance Officer (CCO). The CCO, in cooperation with the Corporate Compliance Committee, is responsible for enforcing the Corporate Compliance Program and the Code of Conduct. The CCO is therefore required to develop compliance policies and standards, maintain the adherence of all Lakemary employees and agents, and monitor all compliance activities.

The CCO is also required to provide an annual report to the President and the Board of Directors of Lakemary Center concerning the implementation and enforcement of these policies. The CCO, in cooperation with the CCC, reviews the Corporate Compliance Program and the Code of Conduct at least annually to determine whether they are working effectively, and recommend revisions to the President as necessary. The Board of Directors must approve revisions.

The Corporate Compliance Process

Education and Training

The CCO is required to provide for the education and training of all current and future Lakemary employees and agents about the purpose and content of the Corporate Compliance Program and the Code of Conduct.

All Lakemary employees and agents, are required to attend initial training, where they will receive a written copy of the Corporate Compliance Program, which includes the Code of Conduct. Employees and agents will then be required to sign an acknowledgment that they have read, understand, and will abide by these policies.

The training will emphasize the importance of adhering to the Corporate Compliance Program and the Code of Conduct, responsibility for reporting actual or suspected noncompliance, and procedures for reporting known or suspected violations. Trainers are required to clearly state that compliance is a condition of employment, and that failure to comply may result in disciplinary action, including termination.

All Lakemary employees must participate in training on any changes in the plan & related policies. After attending any such training, employees are required to sign an acknowledgment that they have read, understand, and will abide by the requirements that have been set forth.

Lakemary employees who directly bill, or code, individual services (excluding bundled rate services) will attend training for all new federal and state billing regulations as they arise. The CCO is responsible for identifying these employees. After attending the training, employees are required to sign an acknowledgment that they have read, understand, and will abide by the requirements.

Monitoring Compliance

The Corporate Compliance Officer is responsible for establishing and implementing a monitoring system in which compliance procedures are reviewed at least annually. Areas that may be reviewed include, but are not limited to: billing, sales, marketing, requisition forms, and pricing. The compliance review may also address issues related to contracts, competitive practices, marketing materials, coding and billing, reporting, and record keeping.

A report will be prepared by the Corporate Compliance Officer and/or the Corporate Compliance Committee. If any review reveals misconduct, the Corporate Compliance Officer will recommend corrective action, including discipline for any violations to the President/CEO.

Reporting Violations

The Corporate Compliance Officer is responsible for establishing an effective plan for reporting violations. This plan includes the following practices and procedures, which the CCO must publicize in writing to all employees:

1. All employees must report any known or suspected violation. Employees will not be subject to any reprisal for a good-faith report. Individuals who make such reports may choose to remain anonymous. When an individual chooses not to remain anonymous, he or she may be interviewed in the investigation of any alleged violations. (See Appendix 2 for Reporting Form.)
2. An employee may consult his or her immediate supervisor, the CCO, or any member of the CCC with any questions. Any employee to whom a question is directed should respond to the inquiry or refer it to appropriate Lakemary personnel.

3. An employee may report any known or suspected violation to his or her immediate supervisor or to the CCO. If a report is not made directly to the CCO, it must be immediately forwarded to this officer.
4. The CCO is responsible for reviewing all reports of known or suspected violations. Both the supervisor receiving such a report and the CCO will maintain confidentiality regarding the identity of employees who submit such reports. This investigation will begin within five working days.
5. In all cases, the CCO will maintain an open door, non-retribution policy to encourage employees to make appropriate inquiry rather than speculating about the proper application of the compliance program, the Code of Conduct, related policies, or applicable law. Any employee who files a good faith report under this program or the Federal False Claims Act shall be protected from discharge, demotion, suspension, threat, harassment, discrimination or retaliation with respect to such good faith report.

Discipline for Violations

Lakemary is committed to providing an environment that encourages and allows employees to seek and receive prompt guidance before engaging in conduct that may violate the Corporate Compliance Program or the Code of Conduct. If a violation occurs, Lakemary will document all reasons for disciplinary actions taken against its personnel. The determination of the appropriate discipline will be made in accordance with Lakemary policy. Discipline may include, but is not limited to, private censure, suspension without pay, demotion, or termination. In addition to these disciplinary measures, legal action may also be initiated by Lakemary against any parties involved in Corporate Compliance Program violations.

The following factors may be taken into account: (1) the nature of the violation and its ramifications for Lakemary; (2) disciplinary action imposed for similar violations; (3) history of past violations; (4) whether the violation was willful or unintentional; (5) whether the individual was directly or indirectly involved in the violation; (6) whether the violation represented an isolated occurrence or a pattern of conduct; (7) whether the violation consisted of failure to supervise another individual, and the extent to which the circumstances reflected lack of diligence; (8) whether the violation consisted of retaliation against another individual for reporting a good-faith suspected violation or cooperating with an investigation, and the nature of such retaliation; (9) whether the individual in question reported the violation; and (10) the degree to which the individual cooperated with the investigation.

In addition to being sanctioned for violations, supervisors may be sanctioned for failing to adequately instruct their subordinates or for failing to detect noncompliance, when reasonable diligence would have led to the discovery of any problems or violations and allowed Lakemary the opportunity to correct them.

Response to Searches and Administrative Investigations

If an investigator from any federal, state, or other regulatory agency arrives at a Lakemary facility, the President or the Corporate Compliance Officer (CCO) should be contacted immediately. The investigator should be asked to not proceed until one of those persons is present.

If an investigator from any federal, state, or other regulatory agency contacts an employee directly, either at work or at home, the CCO should be informed immediately. Deciding whether and how to respond to an investigator is up to the employee, but the employee has the right not to respond until after receiving legal advice. Questions involving investigations and the rights of Lakemary employees pursuant to such investigations should be addressed directly to the CCO.

Maintenance of the attorney-client privilege during an investigation is imperative. To ensure that this privilege remains intact, Lakemary legal counsel should be present during any investigation.

Corporate Compliance Program and Code of Conduct Plan

Search Warrants

This section provides detailed instructions for employees who are served while on duty with search warrants. Employees cannot allow any law enforcement agent to conduct a search on Lakemary Center's owned or leased property without a valid search warrant signed by a Judge. Anyone identifying themselves as an agent with a warrant should be asked to show official identification and provide a copy of the warrant. Immediately notify the President or CCO. Lakemary Center's counsel has the right to review the warrant and keep a copy of it. If the affidavit in support of the warrant is not attached, the employee being served should ask for a copy.

A search warrant is a document issued by a court that authorizes a police officer or somebody else named in the document to go into a building, place or open a container (e.g. vault, safety deposit box), to search and seize anything that might serve as evidence of a crime or could be used to commit a crime (e.g. computers, file cabinets, electronic records, paper documents, etc.).

Employees receiving the warrant need to:

- Check for proper identification
- Request a copy of the warrant
- Write down the name and agency of the lead agent
- Call the President or CCO and should notify their direct supervisor immediately
- If requested, provide assistance for locating items in question
-

Search Warrant Procedures:

- Once the employee has been shown proper identification and obtained a copy of the warrant, he/she should immediately call the President and/or CCO, and their direct supervisor.
- The warrant must identify the place to be searched and may have set time limits. (i.e. Warrants often specify that they are for daytime searches only.) All warrants have an expiration date. Employees should read the warrant and make sure the warrant gives the agents the authority to search the premises of Lakemary Center's owned or leased properties.
- When the employee contacts the President, CCO and direct supervisor, the employee should relate the following information:
 - The facts of the warrant
 - The law enforcement and regulatory agencies involved
 - The areas to be searched under the provisions of the warrant
 - The types of evidence to be seized under the warrant
- It is a crime to obstruct an agent in the lawful exercise of his/her duties, including execution of a warrant. However, asking questions and requesting a copy of the warrant are not obstruction. Remain calm, polite and observant. (Observe the course of the search, but do not interfere with it.)
- Agents may use photocopy machines instead of seizing records with clearance from the President and/or CCO.
- All Federal and State agents are required to leave an inventory of items taken during the search. This inventory must be forwarded to President and/or CCO immediately.
- Be conscientious of the fact that any conversations with an agent will eventually be documented and probably used at a later date. Other than assisting agents in locating items specified in the warrant, Lakemary Center employees do not have to submit to questioning.

No employee is to destroy Lakemary Center, Inc.'s records until the date specified and in accordance with LMC's record retention and destruction policy.

THE LAKEMARY CODE OF CONDUCT

The Code of Conduct applies to all Lakemary employees and agents. Each employee or agent is individually responsible for compliance. Because rapid changes in the developmental disability and mental health care field constantly present new ethical and legal issues, no code of conduct can cover all circumstances or anticipate every situation. Thus, individuals who encounter situations not specifically addressed by this code should seek to apply its overall philosophy and concepts. When there is uncertainty about a particular situation, it should be reviewed with a supervisor, the Corporate Compliance Officer, or a member of the Corporate Compliance Committee. This code of conduct addresses both general ethical standards and specific ethical issues related to the nature of Lakemary's mission and work.

General Ethical Standards

Lakemary's overall policy is to require the observance of all laws applicable to its business. Lakemary cares *how* results are obtained, not just that they are obtained. No supervisor, manager, officer, or director can require or approve any action by any Lakemary employee that would violate the law. Ethical behavior is also important in its own right to preserve the long-standing reputation of Lakemary and its employees for integrity and lawful conduct.

Lakemary expects candor from all employees, and compliance with the Code of Conduct and all related policies. Lakemary personnel are expected to always tell management all that they are doing, to record all transactions accurately in their books and records, and to be honest and forthcoming with Lakemary's external auditors. Concealing information implies that our written standards, policies, and rules can be ignored when inconvenient to follow. This can result in corruption, illegal activity, and demoralization.

Individual Supported Rights

As a result of the quality and value of our services, and because of the respect and confidence we instill in our Individual's supported, Lakemary has gained recognition in the field of services for persons with developmental disabilities and co-occurring mental illness. To maintain this standard, all Lakemary employees who deal with Individual's supported are responsible for safeguarding their rights. To provide guidance in this area, and to ensure that treatment is provided in accordance with applicable law, Lakemary has adopted written policies concerning Individual's supported rights. These policies include privacy rights enacted under the Health Insurance Portability and Accountability Act of 1996 (HIPAA). All staff members, particularly those involved in Lakemary clinical and educational areas should become familiar with all related policies. See Employee Handbook for more information.

Protection of Property

Lakemary and their staff respect the personal belongings of each child and will support each child in keeping their belongings safe. Refer to the Parent and Family Handbook – Clothing and Other Personal Items section for complete details.

Witnessing of Signatures on Documents for Parents / Guardians

Residential staff do not witness documents for parents or guardians.

Conflicts of Interest

All Lakemary personnel, including all board members and officers, must avoid situations in which their personal interest's conflict, or appear to conflict, with the interests of Lakemary. A conflict of interest is defined as "any opportunity for personal gain apart from the normal compensation provided through employment." To provide guidance concerning possible conflicts of interest, Lakemary has adopted a written policy on conflict of interest. See Employee Handbook for more information.

Financial Arrangements

Day-to-day operations can raise ethical and legal issues in the area of financial arrangements. The following guidelines are intended to help all personnel make appropriate decisions in potentially difficult situations.

“Kickbacks” and Rebates

Employees and members of their families may not receive “kickbacks” or rebates as a result of Lakemary’s purchase or sale of goods and services. Kickbacks and rebates can take many forms, not limited to direct cash payments or credits. In general, if an employee or an employee’s family stands to gain personally through the transaction, it is prohibited.

Reciprocity

In some instances, Lakemary may purchase goods or services from a supplier who also contracts with Lakemary for services. This practice is normal and acceptable, but any form of pressure for reciprocity with that supplier is not. Suppliers must not be asked to contract for services in order to become or continue to be a supplier.

Gifts or Gratuities

Employees will never accept money (i.e., checks, cash, tips, money orders, gift cards with cash back value for example: Visa Card which can be redeemed for cash) under any circumstances from individuals supported or their family members / guardians. Employees will not accept or agree to accept any economic opportunity, gift, loan, special discount or services having an aggregate value of more than \$100 in any calendar year, from any individuals known to have special interest in LMC, its services, or individuals supported or who are themselves consumers of services provided.

Employees are to report to the Corporate Compliance Officer when gifts are received, which do not meet our guidelines (see the above paragraph).

Transportation and Lodging

Some suppliers offer transportation to, and lodging at, their business location during the course of solicitation or in other circumstances. Such travel and lodging should ordinarily be refused except in unusual cases, with prior approval by the Corporate Compliance Officer.

Entertainment

Employees may not encourage or solicit entertainment from any individual or company with whom Lakemary does business. From time to time, personnel may offer or accept entertainment, but only if the entertainment meets IRS guidelines for business entertainment and does not involve lavish expenditure. Offering or accepting entertainment that is not a reasonable adjunct to a business relationship, but that is primarily intended to gain favor or influence is prohibited. The value of items received as part of business entertainment may not exceed \$100 per calendar year.

Payments to Agents, Representatives, Lakemary agents, and Consultants

Agreements with agents, sales representatives, Lakemary agents, or consultants must be in writing in a form acceptable to senior management and must clearly and accurately set forth the services to be performed, the applicable rate or fee, and the basis for earning the commission or fee. Any such payments must be reasonable amounts, not excessive in light of the practice in the trade, commensurate with the value of the services rendered, and supported by appropriate documentation. To avoid questions of over-billing and possible rebates, services should be billed at fair market value. No

inducement in exchange for referral of individuals supported may be offered to, or accepted from, any Lakemary agent or other health care provider.

Payments to Government Employees

No payments of money or gifts may be offered or made available in any amount, directly or indirectly, to any federal or state government official or employee.

Other Improper Payments

No extra-contractual payments or offer of benefit may be made to suppliers or Lakemary agents as an inducement to contract with Lakemary. The use of funds or assets for any unlawful or unethical purpose is prohibited. The making of any payment to a third party for any purpose other than that disclosed on the payment documentation is prohibited.

Fundraising

Individuals supported and employees of LMC should not be involved in campaigns or publicity efforts to raise funds. All fundraising activities must be pre-approved by the Director of Marketing and Development.

CROSS REFERENCE:

Policy: 1.2.7 Fundraising
 3.1.12 Protection Against Exploitation

Marketing & Business Development

The results of trustworthy marketing are essential to forming and maintaining sound, lasting business relationships. Any and all marketing and business development involving Lakemary should be conducted in a manner that is clear, correct, non-deceptive, and fully informative. Those involved in marketing must never make misrepresentations or dishonest statements about Lakemary to anyone. All marketing and business development activities should be in accordance with applicable federal and state regulations and must avoid any appearance of inducement of individual supported referral or admission to the Lakemary.

Third-Party Payers

Lakemary requires compliance with all laws, regulations, and guidelines governing federally funded health care programs. All claims for services for which reimbursement is requested from any third-party payer must be clinically necessary and documented to accurately reflect the services actually performed. Any individual who believes that a violation or potential violation has occurred should immediately report it. Questions involving the following areas should be directed immediately to the Corporate Compliance Officer.

Clinical Necessity

Clinical necessity is an important consideration for Lakemary Center in caring for individuals supported. Lakemary clinicians must weigh the potential benefits and risks of available treatment and testing options and then choose an appropriate course of action. As a result of recent actions by the federal government, clinical necessity is taking on new importance. If fraudulent activity, including activities related to clinical necessity issues, is found in an audit, Lakemary clinicians may be subject to monetary penalties, exclusion from participating in federally funded health care programs, felony prosecution, and even imprisonment.

Lakemary clinicians are required to ensure that claims are submitted to payors only for services that the Lakemary clinicians have reason to believe are necessary. Lakemary clinicians should perform and order only those services that are clinically necessary for the diagnosis and treatment of individuals supported.

Billing, Documentation, and Coding

Lakemary clinicians are required to maintain appropriate documentation to support the clinical necessity of any service. Appropriate documentation includes preparing forms with the correct diagnosis codes and supporting the clinical necessity of a service in the individual's supported clinical record. In addition, clinical records must be documented according to applicable federal and state regulatory standards.

Claims may not be submitted to any third-party payor unless the services provided have actually been performed, are accurately coded, and are appropriately documented in the clinical record.

Any questions regarding coding and documentation should be directed immediately to the Corporate Compliance Officer.

Deficit Reduction Act Section 6032

False Claim Act

Sections 3729 to 3733 of Title 31 of the United States Code provide in pertinent part that:

1. Any person who: knowingly presents, or causes to be presented, to an officer or employee of the United States government a false or fraudulent claim for payment or approval; knowingly makes, uses, or causes to be made or used, a false record or statement to get a false or fraudulent claim paid or approved by the government; conspires to defraud the government by getting a false or fraudulent claim allowed or paid; has possession, custody, or control of property or money used, or to be used, by the government and, intending to defraud the government or willfully to conceal the property, delivers or causes to be delivered, less property than the amount for which the person receives a certificate or receipt; authorized to make or deliver a document certifying receipt of property used, or to be used, by the government and, intending to defraud the government, makes or delivers the receipt without completely knowing that the information on the receipt is true; knowingly buys, or receives as a pledge of an obligation or debt, public property from an officer or employee of the government, who lawfully may not sell or pledge the property; or knowingly makes, uses, or causes to be made or used, a false record or statement to conceal, avoid, or decrease an obligation to pay or transmit money or property to the government, is liable to the United States government for a civil penalty of not less than \$5,000 and not more than \$10,000, plus 3 times the amount of damages which the government sustains because of the act of that person, with certain exceptions.
2. The Attorney General shall diligently investigate violations of the above, and if the Attorney General finds that a person has violated or is violating the law, then he/she may bring a civil action against the person. A person may bring a civil action for the violation of the above for the person and for the United States government. The action shall be brought in the name of the government. If the government proceeds with the action, it shall have the primary responsibility for prosecuting the action. Such person shall have the right to continue as a party to the action, subject to certain limitations, and may have a right to share in a recovery if certain conditions are met.

Administrative Remedies for False Claims and Statements

Sections 3801 to 3812 of Title 31 of the United States Code provide in pertinent part that:

1. Any person who makes, presents, or submits, or causes to be made, presented, or submitted, a claim that a person knows or has reason to know if false, fictitious, or fraudulent; includes or is supported by any written statement which asserts a material fact which is false, fictitious, or fraudulent as a result of such omission, and is a statement in which the person making, presenting, or submitting such statement has a duty to include such material fact; or is for

Corporate Compliance Program and Code of Conduct Plan

payment for the provision of property or services which the person has not provided as claimed, shall be subject to, in addition to any other remedy that may be prescribed by law, a civil penalty of not more than \$5,000 for each such claim. Such person may also be subject to an assessment of twice the amount of the false, fictitious, or fraudulent claim, or the portion of such claim, which is determined to be in violation of the law.

2. Any person who makes, presents, or submits, or causes to be made, presented, or submitted, a written statement that the person knows or has reason to know asserts a material fact which is false, fictitious, or fraudulent as a result of such omission; and contains or is accompanied by an express certification or affirmation of the truthfulness and accuracy of the contents of the statement, shall be subject to, in addition to any other remedy that may be prescribed by law, a civil penalty of not more than \$5,000 for each such statement.

Books, Records, Accounting, and Document Retention

Books and Records

The law requires Lakemary to maintain books and records that accurately reflect the true nature of the transactions represented. False or artificial entries must never be made in any Lakemary books or records for any reason, nor should entries in any Lakemary records be altered. No payment or receipt on behalf of Lakemary may be approved or made with the intention or understanding that any part of it is to be used for a purpose other than that described in the documents supporting the transaction. "Slush funds" or similar off-book accounts, where there is no accounting of receipts or expenditures on corporate books, are strictly prohibited. Lakemary personnel must not create or participate in the creation of any records intended to mislead or conceal.

These same requirements apply to clinical records. Lakemary health care providers and personnel with authority to make entries on individuals supported charts are responsible for timely and accurate documentation of all individuals supported care services and for complying with all applicable regulations, policies, and procedures with regard to clinical records.

Proper Accounting

Lakemary maintains a system of internal controls to provide reasonable assurance that transactions are executed and recorded in accordance with management's authorization. The system includes written policies and procedures and examination by external auditors and internal staff. All personnel must strictly adhere to these policies and procedures.

Retention of Records

Lakemary has instituted document retention policies that must be followed by all personnel. Document retention and destruction must take place in accordance with established written policy. The Corporate Compliance Officer is responsible for monitoring compliance with these policies. If an individual has reported a violation or suspected violation, the Corporate Compliance Officer is responsible for immediately directing all employees to retain all pertinent documents.

The Corporate Compliance Officer is responsible for establishing procedures to prevent the intentional or inadvertent destruction of documents that could lead to prosecution for obstruction of justice. If Lakemary is served with a subpoena or has reason to believe a subpoena may be served, the Corporate Compliance Officer is responsible for immediately directing employees to retain all documents that may be potentially responsive to that subpoena.

Tax Exempt Status

Use of Lakemary Resources, Funds, and Assets

Lakemary Center is a charitable, tax-exempt corporation under section 501(c)(3) of the Internal Revenue Code. As such, it is obligated to meet certain “community benefit” standards and must assure that the assets of the organization is safeguarded against uses that are illegal or otherwise fall outside of their charitable purposes. Employees are not to engage in any activity that involves the use of Lakemary resources or property for any private benefit.

Assets include not only tangible items such as equipment, inventory, funds, and office supplies, but also concepts, business strategies and plans, financial data, and other information about Lakemary. Employees may not transfer any assets to other persons or entities except in the ordinary course of business. Transactions must be in the best interests of Lakemary and must be negotiated at arm’s length for fair market value.

Employees faced with questionable situations should consult with their supervisor or the Corporate Compliance Officer. Employees who suspect a violation of tax-exemption requirements should disclose that situation immediately.

Political Activity

Lakemary encourages all employees to vote and to be active in the political process. However, various laws restrict the use of corporate funds or other assets in connection with political activity. The political process has become highly regulated, and anyone with a question about what is or is not proper should consult with the Corporate Compliance Officer before agreeing to do anything that could be construed as involving Lakemary funds in any political activity at the federal, state, or local level.

Employment and Employee Relations

Equal Opportunity Employer

Lakemary is an equal opportunity employer that encourages a work environment free of harassment or discrimination because of race, sex, sexual orientation, religion, national origin, age, or disability. Lakemary’s employment policies are provided in the *Employee Handbook*. Known or suspected violations will be reported in accordance with these policies.

Job Responsibilities

To ensure compliance with laws and regulations, all staff members should be assigned authority and job responsibilities based on experience and education. Supervisors who delegate authority to other staff members will allow them the opportunity for reasonable and consistent supervision. Job responsibilities will be clearly defined and in writing, and supervisors will be available for questions when staff members are uncertain about procedures.

Prohibited Crimes

Lakemary will not employ individuals convicted of a criminal offense related to childcare or health care or listed by a federal agency as ineligible for participation in a federally funded program.

Personal Property

Staff and visitors are encouraged to leave personal property secured in their vehicle. In the event personal property is brought into the direct work environment it must be secured in a locked: cabinet, locker, desk, manager’s office, etc. Lakemary Center, Inc. is not responsible for lost, stolen, or damaged personal property of staff.

Lakemary Property

Lakemary has procedures in place to protect its properties (owned and leased) and staff are trained and encouraged to protect the property owned/leased by the organization. In addition, Lakemary carries property insurance to cover damage and loss.

Cross Reference: Employee Handbook, Property Equipment and Supplies
Transportation Manual
Children's PRTF Procedure Manual

Clinical Staff

Clinical staff membership (employed or contracted) and Lakemary privileges will not be granted to any practitioner who is excluded or debarred from participation in any federally funded health care program. If criminal charges related to health care are brought against any practitioner having privileges, or if any federal agency proposes to exclude a practitioner, then that individual's privileges, to the extent that they involve providing services for which Lakemary may obtain reimbursement from any federally funded health care program, will be suspended pending resolution of the matter. If resolution results in conviction, debarment, or exclusion, Lakemary will immediately terminate that practitioner's membership and privileges.

APPENDIX 2

Reporting Form for Corporate Compliance Program and Code of Conduct

Instructions:

Please report below any known or suspected violation of the Lakemary Corporate Compliance Program, the Code of Conduct, or any related policy or procedure. If more space is needed, please write on the reverse side.

In lieu of using this Reporting Form, an email may be sent to the Corporate Compliance Officer (or other member of the Corporate Compliance Committee), or the reporting individual may contact the Corporate Compliance Officer via the Lakemary's Corporate Compliance Hotline at 913-937-9288.

Reporting individuals may remain anonymous at their request. Retaliation against an individual reporting a violation or suspected violation in good faith is strictly prohibited. Anyone engaging in such retaliation will be subject to discipline up to and including termination.

Signature

Name (Please Print)

If you wish to remain anonymous, do not sign or print your name above.

Send to: Corporate Compliance Officer
Lakemary Center
100 Lakemary Dr.
Paola, Kansas 66071
Fax: 913-937-9288
Telephone: 913-937-9288

ACKNOWLEDGEMENT OF RECEIPT AND UNDERSTANDING

**LAKEMARY CENTER
CORPORATE COMPLIANCE PROGRAM
AND CODE OF CONDUCT**

I acknowledge receipt of the Lakemary Center Corporate Compliance Program and Code of Conduct Plan. I further understand it is my responsibility to know and abide by the procedures and guidelines contained in the Lakemary Center Corporate Compliance Program and Code of Conduct Plan.

I have been informed and understand the Lakemary Center Corporate Compliance Program and Code of Conduct Plan may be updated to include additions and changes to Lakemary Center policies and procedures. I further understand that the most current Lakemary Center Corporate Compliance Program and Code of Conduct Plan is always accessible to me on our website (www.lakemary.org) or in the Human Resources Department. Corporate Compliance Program and Code of Conduct Plan change notifications will be provided to employees at the time payroll checks and advices are distributed. I agree to review the changes and acknowledge the effective date will begin on the date of distribution.

By my signature below, I also acknowledge that I have received a copy of the handbook, have been presented with an overview, and agree to read the procedures / guidelines contained in this handbook within one week from the date signed. Should I have questions about specific procedure / guidelines I will seek out a Human Resources Representative for clarification. I acknowledge it is my responsibility to read and comply with the Handbook and all future revisions.

Signature

Name (Please Print)

Date