

COMCARE of Sedgwick County

# CODE -OF- CONDUCT

Compliance Hotline - 660-7787

[www.sedgwickcounty.org](http://www.sedgwickcounty.org)



COMCARE

*A Licensed Community Mental Health Center*

*Sedgwick County...  
working for you*

# OUR

## Mission

The mission of COMCARE of Sedgwick County is to help people with Mental Health and Substance Abuse needs to improve the quality of their lives.

## Vision

COMCARE envisions a healthy community where people are provided the support needed to reach their potential.

## Operating Principles

Accountability: accepting responsibility for our job performance, actions, behavior and the resources entrusted to us.

Commitment: individual and collective dedication of employees to their jobs and the organization in providing quality services to meet client/customer needs.

Equal Opportunity: providing a work environment that is fair to all current and prospective employees through equal treatment in employee benefits, promotions, training, continuing education, and daily responsibilities, as well as equitable access to all citizens and consumers of Sedgwick County services.

Honesty: truthful, forthright interaction among employees, management and the public - which fosters trust, integrity and a lasting working relationship.

Open Communication: the honest exchange and processing of ideas and information with the public, co-workers, staff, other departments and administration.

Professionalism: an individual promoting honesty, respect, pride, positive self-image and team effort; adhering to a high standard of ethical conduct, competence, and innovation, and who acknowledges criticism, accepts responsibility, and strives for occupational growth.

Respect: consistently demonstrating a deep regard for the diversity, needs, feelings, and beliefs of all people, and acknowledges ideas and opinions of every employee, citizen and consumer.

# CODE -OF- CONDUCT



## Message from our Director

Dear COMCARE staff,

One common definition of a code is an arranged collection of rules and agreements. That's precisely what our compliance code of conduct represents ... a collection of the expectations and rules we agree to follow every day in our work. Having a code of conduct allows us to have clearly defined expectations and rules that govern our work behavior. Having a code also provides us with measures of accountability to one another. We believe that adherence to this code will enable us to maintain financial integrity, better ensure quality care and protect our organization and the individuals we're here to serve. As public servants, we have the obligation to ensure effective and efficient use of the funds entrusted to us. COMCARE's Compliance Code of Conduct outlines for us the steps we need to follow to make us good stewards.

*Marilyn Cook*

Marilyn Cook  
Executive Director

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# Corporate Compliance

At COMCARE, corporate compliance means more than just following the rules. It is our commitment to strong ethical practices in all that we do, as well as having strong standards and expectations in relation to our delivery of quality services to clients, families and our community.

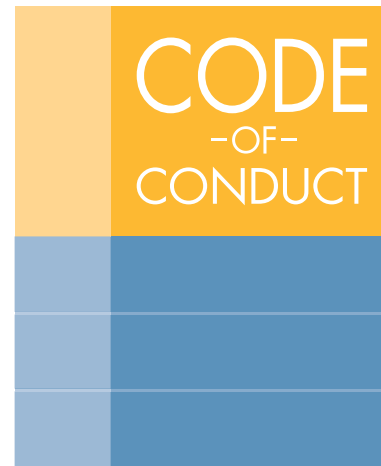
Integrity and honesty are at the core of these standards and the driving force behind our philosophy of doing the right thing.

We are dedicated to the efficient and effective use of resources. We accept responsibility for the public's trust and are accountable for our actions.

We know that it takes commitment from everyone and believe that with a focus on these guiding principles we demonstrate a commitment to excellence.

The future depends  
on what we do in the present.

Mohandas K. Gandhi



No one can  
whistle a symphony.  
It takes an orchestra to play it.

Halford E. Luccock

## Code of Conduct Overview

The COMCARE Code of Conduct has been established to define and govern the conduct expected of all employees and to provide clear guidance as well.

We are dedicated to creating and maintaining an environment where high ethical and work standards contribute to the delivery of excellent client care.

No matter where you work at COMCARE or what type of job you hold, compliance and this code of conduct applies to you.

As a representative of COMCARE, you hold our reputation in your hands. Thus we recognize the duty of each individual to commit to the highest ethical standards in their actions and decisions.

Thank you for supporting this effort. Your commitment will greatly benefit the community we are privileged to serve.

# Asking Questions & Reporting Concerns

COMCARE of Sedgwick County employees are expected to report any violation of the COMCARE Code of Conduct.

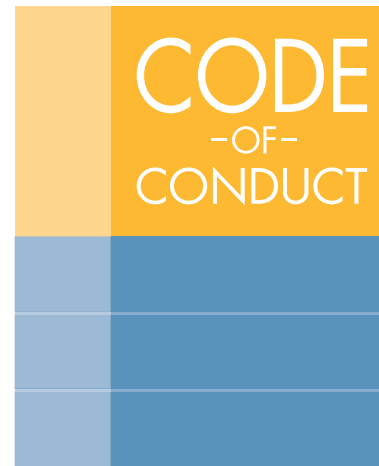
You may ask a compliance question or report a concern by:

- Speaking with your supervisor
- Calling or e-mailing your compliance officer
  - Joan Tammany - 660-7626 or [jtammany@sedgwick.gov](mailto:jtammany@sedgwick.gov)
- Calling the compliance hotline
  - 660-7787
- Visit [www.ourworkplace.com](http://www.ourworkplace.com) to anonymously report fraud, abuse or waste of Sedgwick County resources.

If you are not comfortable reporting issues in this manner, you may make an anonymous report.

All reports will be investigated and action taken as appropriate.

No matter what your role is at COMCARE of Sedgwick County, you are an important part in delivering the best possible care to our clients.



# Striving for Excellence

## Quality of Care & Services

COMCARE of Sedgwick County is committed to providing high quality mental health and substance use treatment services to our clients and to delivering care in an ethical, professional and cost effective manner. We treat clients with respect and dignity and provide care that is medically necessary and appropriate.

- We provide equal access to care for all clients regardless of gender, gender identity or expression, color, age, sexual orientation, disability status, ancestry, race, religious or cultural beliefs, source of payment or any other classification protected by law.
- We maintain accurate and timely records of client information.
- All individuals employed to care for our clients are properly licensed, credentialed, and/or have the necessary experience, training and expertise.
- We act in a respectful, collaborative and professional manner.

# Be Honest

As one of our fundamental values, honesty is an expectation that cannot and will not be compromised. You are expected to be honest in all aspects of your role as a member of the COMCARE team. We view dishonesty in very simple terms:

- Lying
- Cheating
- Stealing
- Falsifying records
  - ie: inaccurate reporting of time worked, mileage and services provided to clients

Dishonesty is taken very seriously at COMCARE. You are expected to be honest in all of your work-related activities.

## Confidentiality & Privacy

COMCARE is committed to safeguarding business information and patient privacy. We will be responsible with how we use and manage our client information. We only access the protected health information we need to do our jobs. Access for any other reason is prohibited and may result in disciplinary action.

- We are responsible for knowing the rules and regulations relating to confidentiality.
- We routinely educate clients about their rights to privacy.
- We keep client information confidential.
- We do not disclose patient information unless a current release is on file and has been signed by the client/legal guardian and the release of information is supported by a legitimate purpose, unless there is an allowable exception to confidentiality as defined by state and/or federal statutes.
- We do not discuss client information in any public areas, including client waiting areas, hallways, break rooms, elevators, restrooms, business meetings, in the community, etc.
- In addition to patient information, access to sensitive information such as personnel and financial information is protected and its disclosure is strictly limited.
- We are bound to maintain this confidentiality even after the closure of a client's episode of care, the client's death, and after our employment with COMCARE has ended.

# Leadership Responsibilities

While all COMCARE of Sedgwick County employees are obligated to follow the Code of Conduct, we expect our leaders to set an example by modeling appropriate behaviors and actions.

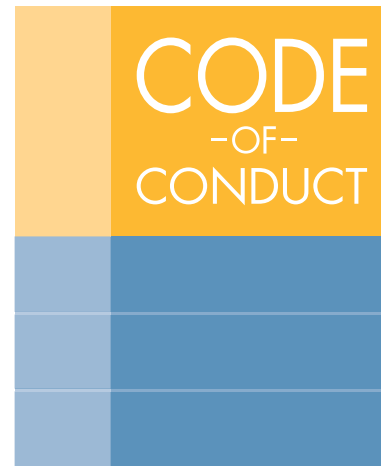
- Our agency leaders are required to set an ethical example for their employees.
- Our leaders are responsible for creating and maintaining an environment that supports honest and open communication.
- Our leaders are responsible for addressing and responding to employee questions and concerns in a timely manner.
- Our leaders must ensure those on their teams have sufficient resources, information and understanding in order to comply with laws, regulations and policies.
- Our leaders will create a culture within COMCARE that promotes the highest standards of ethics and compliance.
- COMCARE of Sedgwick County will never sacrifice ethical and compliant behavior in the pursuit of business objectives.
- We strive to recognize high performers and manage disruptive behavior in a timely manner.
- Leaders are responsible for recognizing we work in a large and complex organization where decisions made by one person may have implications to the larger system, thus must be willing to ask questions and seek information and understanding of the larger picture.
- We need to assume "good intent" on the part of others.
- Leaders will recognize and call out both large and small successes employees experience with clients – share the success, as well as the burden of clinical outcomes.
- Leaders will be committed to continuous learning and demonstrate self-initiative.

# Employment Practices

At COMCARE of Sedgwick County, our greatest strength is our employees. Our reputation as an outstanding provider of mental health and substance abuse services is built by our employees. We must encourage and support each other as we work toward common goals.

- We are an equal opportunity employer and we do not discriminate against employees or potential employees on the basis of gender, gender identity, color, age, sexual orientation, disability status, ancestry, race, religious or cultural beliefs, or any other classifications protected by law.
- We perform assigned tasks in a responsible, respectful, culturally sensitive and cooperative manner.
- We treat one another with mutual respect and dignity.
- Whenever possible, we go directly to the person we have a concern with before speaking about the problem with peers or others.
- We comply with the COMCARE Code of Conduct, as well as with the policies and procedures applicable to our employment with Sedgwick County.
- We adhere to the harassment policies and behave professionally in the workplace.
- We abide by policies prohibiting illegal possession, distribution, use or being under the influence of illegal drugs, alcohol or other substances.
- We abide by time and leave reporting policies.

Working  
Together



Watch the little things;  
a small leak will sink a great ship.

Benjamin Franklin

# Billing & Reimbursement

COMCARE prepares and submits bills that accurately reflect the medically necessary services provided. These bills are supported by documentation in the medical record and are compliant with applicable laws and regulations.

- We will bill only for services actually rendered. COMCARE does not tolerate billing practices that misrepresent the actual services provided.
- We will complete supporting documentation in an accurate and timely manner. We understand our medical records are legal documents that describe the services our patients receive. We operate on the principle that if the appropriate and required documentation is not present, then there is no evidence the service was provided. (From a legal perspective, if it is not documented, it did not occur).
- If we discover errors or notice areas for improvement, we notify appropriate personnel to correct the issue in a timely manner.
- COMCARE staff involved in coding, billing, documenting and accounting for patient care services for the purpose of billing government, private or individual payers must comply with all federal, state and local regulations and COMCARE policies and procedures for detecting, preventing, and reporting fraud, abuse, waste or misconduct.
- All services delivered should be guided by a current and individualized treatment plan.

# Medical Necessity

COMCARE shall submit claims for payment to government, private or individual payers for services that are medically necessary and appropriate.

- When providing services, COMCARE professionals shall only provide services that are consistent with generally accepted medical standards for diagnosis or treatment that is determined to be medically necessary and appropriate.
- In some cases, a professional may determine that services are medically necessary or appropriate, but the client's health care plan may not cover those services. In those cases, a client should refer to his or her health plan administration to receive information about the process for disallowed claims or uncovered benefits.
- Clients may request services that are not covered benefits. Such services may be provided as long as they are medically necessary, comply with agency policy or procedure and the client is provided information on self-pay costs for these services.
- Professional coding and documentation will be consistent with the standards established in COMCARE policy.
- We work from an individualized treatment plan that captures all services to be delivered.

# Accountability

# Fraud & Abuse

Fraud is knowingly and willfully misrepresenting, cheating or withholding truth that results in an unauthorized benefit.

Abuse refers to the practices that result in unnecessary cost to the state, federal government or COMCARE.

These include but are not limited to:

- Documenting services that were not delivered.
- Providing more or fewer services than are medically necessary.
- Billing services for transportation.
- Submitting claims for services different from the service actually delivered.
- Misrepresenting the actual duration of the service provided.
- Generic documentation (does not meet documentation guidelines).
- Failure to meet professionally recognized standards for quality mental health care.

COMCARE's reputation for integrity and our continued success depends on each employee being honest and following all laws and regulations. If an employee suspects fraud or abuse, they are expected to report it. Suspected fraud or abuse can be reported by:

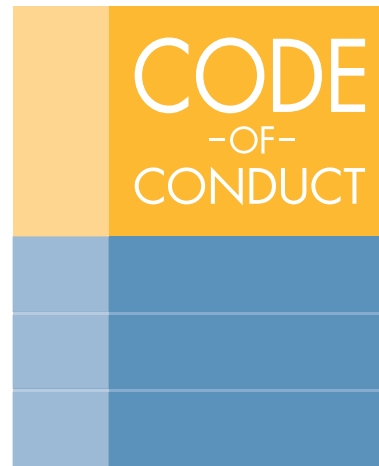
- Discussing suspected activity with immediate supervisor or any other manager.
- Contacting a member of the compliance team.
  - Joan Tammany, Dir. of Quality, Risk Management and Compliance/Compliance Officer: 660-7626
  - Amy Eicher, UR/Compliance Coordinator: 660-7624
  - Amy Unrein, UR/Compliance Coordinator: 660-7623
  - Tracy Lolley, Billing Manager: 660-7611
- Calling the confidential compliance hotline at 660-7787.
- Reporting anonymously to [www.ourworkplace.com](http://www.ourworkplace.com).

# Conflicts of Interest

COMCARE of Sedgwick County expects and requires employees to act in an ethical and honest manner, and to avoid actual and potential conflicts of interest with COMCARE.

- We do not engage in any activity, practice, or act that creates a conflict with the interests of COMCARE.
- We disclose any actual or potential conflicts of interest to COMCARE in accordance with policy.
- We act solely in the best interest of COMCARE whenever acting as an agent of the organization.
- We do not engage in outside employment that affects our work at COMCARE.
- We do not misuse confidential information for personal gain.
- We may not accept substantial gifts from any source.
- If someone wants to make a substantial gift or donation to COMCARE, please contact Marilyn Cook, Executive Director.

Honesty  
& Trust



Act as if it were  
impossible to fail.

Dorthea Brande

## Professionalism

COMCARE of Sedgwick County promotes and requires employees to demonstrate professional conduct and attitude.

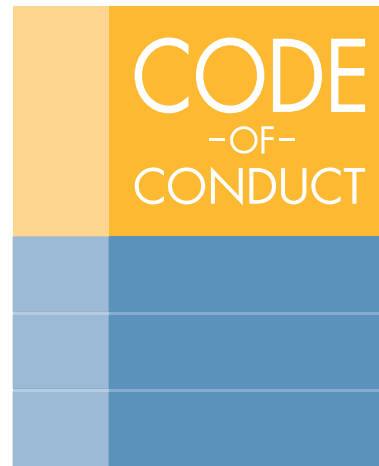
- We value diversity and offer professional courtesy to all team members.
- We conduct ourselves with compassion to everyone we come in contact with throughout our work day.
- We take responsibility for our work and follow through with all tasks.
- We use COMCARE's resources wisely.
- We follow the COMCARE dress code and take pride in our appearance.
- We create and participate in a team environment where honest feedback is encouraged and valued.
- We use appropriate language when we are speaking or sending e-mails.
- We refrain from discrimination or any type of harassment.
- We are helpful and friendly to co-workers.

# Behave Ethically

Every employee of COMCARE will conduct business in a manner consistent with the highest ethical, legal, and professional standards. Honesty, integrity, and fairness will be demonstrated when working with clients, families, co-workers, business partners, payors and other community partners. Every effort will be made to avoid actual or perceived illegal, unethical or unprofessional conduct.

- We are mindful of maintaining professional and therapeutic boundaries with those we serve.
- We are prohibited from accepting or giving gifts, gratuities or anything beyond common business courtesies of nominal value.
- We do not offer or solicit bribes or kickbacks.
- If you are not sure about an action or decision ask yourself:
  - Does it seem like a law, regulation, or COMCARE policy is being violated?
  - Does the action/behavior appear to be unacceptable or unethical to you?
  - Does it seem inconsistent with COMCARE's values and the Code of Conduct?
  - Would I be embarrassed if my supervisor, co-workers or public learn of my actions?
    - If the answer is yes, or you are still unsure, seek guidance from a supervisor.

## Personal Responsibility



Enthusiasm is contagious.  
Start an epidemic.

Bumper Sticker

## Accountability/Sense of Ownership

At COMCARE, employees do not just identify problems but rather contribute to the solution by providing ideas for resolution.

- We never say, "It's not my job" and strive to add value to serving each other by being proactive and offering assistance when there is a need.
- We recognize that attitude is contagious and thus are responsible for creating a positive work environment by avoiding gossip, negativity, discriminatory practices, and refraining from disruptive behavior.
- We encourage others to grow by offering honest and valuable feedback that is timely and delivered in a caring fashion.
- We own any customer complaints received and take appropriate actions to remediate the issues when possible.
- We recognize that our actions impact others and work to complete our duties in an accurate and timely manner.
- We report known violations of the code to supervisors or compliance staff.
- We will remember that while we work at a specific location, we are all COMCARE employees and those who seek services with us are COMCARE clients.

# Health & Workplace Safety

COMCARE is committed to providing a clean, safe and healthy work environment for all employees, guests and clients. To achieve and sustain this goal, we must recognize our role in fostering a safe work environment and our shared responsibility to follow and promote all safety rules, policies and practices.

- We wear our identification badges visibly at our waist or higher unless we are in a location that would jeopardize a client's right to privacy.
- We are aware of emergency plans, know what to do and will carry out our responsibilities in the event of an evacuation, natural disaster or fire.
- We report any suspicious activity including potential workplace violence or workplace hazards to COMCARE management.
- We utilize incident reports to document unusual events or incidents that are outside our normal business practices.
- We act responsibly and collectively to treat everyone in a respectful and professional manner.
- We immediately report any potential or actual bloodborne pathogen or needle stick exposures to our infection control officer.
- We follow laws and regulations relating to the environment, including laws and rules regarding the handling, storage, use and disposal of hazardous materials and infectious waste.
- We wear proper protective equipment for our jobs, report spills and engage in hand hygiene.
- We put in maintenance requests for any wall hangings, moves or elevated work that would otherwise result in staff using chairs or desks as step stools, or actions that could result in injury.
- We require all direct service providers to receive CPI training to learn how to de-escalate anxious and aggressive clients and only trained staff participate in Crisis Response Team activities.
- We report on-the-job vehicle accidents and injuries immediately and follow all rules relating to medical treatment recommendations for work place injuries.
- We communicate with our supervisor whenever we are exposed to an act of physical aggression or verbal abuse from other employees, clients or others in order to protect staff from dangerous situations.

# Information Security

COMCARE protects its information and information systems from accidental or unauthorized access, disclosures, modification or destruction.

- We log off our workstations, never share our passwords, and always double check fax numbers and e-mail addresses before sending patient and other confidential information.
- We do not install, download, share or copy software programs, or perform other acts that would violate a vendor's software license agreement or organizational procedures.
- We do not use thumb drives/USB devices or personal equipment to store or transport client information between work and home.
- We report information security weaknesses and suspected or actual instances of computer and information theft or abuse to COMCARE's information security officer.
- We comply with regulatory requirements and organizational policy for the creation, management, retention and destruction of records.
- We secure protected health information that may be in paper form in lockable cabinets or offices so it can only be accessed by authorized staff.
- We protect confidential health information from disclosure when copying, faxing, e-mailing and mailing or when speaking to others.
- We only transmit and receive patient information and confidential communications on machines that are located in areas accessible only to staff authorized to see such materials.
- HIPAA breaches are reported to HIPAA Privacy Officer Joan Tammany.

Act as if what you do makes a difference.  
It does.

William James

# Corporate Resources

Each employee, contract provider, volunteer or intern is expected to use agency resources economically and safeguard corporate assets at all times. COMCARE assets and property are for use in providing care and conducting authorized business. They are not to be used for personal reasons unless otherwise permitted by policy. This includes use of items such as:

- Office equipment
- Computers and software
- Office supplies
- County vehicles
- Patient information
- Company records
- Agency funds

Employees are not to remove agency resources from COMCARE property unless you are authorized and need them to perform your job. COMCARE property is to be returned as soon as it is no longer needed for off-site business.

Any use of time or agency resources for personal financial gain unrelated to the organization is prohibited.

It takes less time to do a thing right  
than it does to explain why you did it wrong.

Henry Wadsworth Longfellow

## CODE -OF- CONDUCT

Quality means doing  
the right thing when no one is looking.

Henry Ford

## Teamwork/Collaboration

COMCARE of Sedgwick County is committed to providing a collaborative work environment where successes are celebrated and learning is a norm.

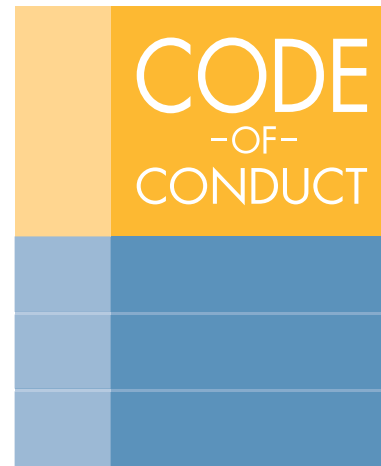
- We recognize that we are a member of a larger team and that we avoid the "we/they" whenever possible
- We welcome new team members with energy and a "How can I help you?" spirit.
- Help co-workers feel appreciated and valued by sending thank you notes for specific actions or verbally thanking them.
- Role model the characteristics of exceptional adult learners. Specifically, when attending trainings or meetings:
  - Be totally present and engaged
  - Listen as if you were going to teach it
  - Take notes for future reference
  - Integrate learning into daily practice
- Share information freely both horizontally and vertically.
- Allow others to benefit from your expertise so listen for opportunities to be a good mentor.
- Gather feedback from others as a means of pushing yourself and others to the next level.
- Seek out mentoring opportunities for personal and professional growth.

# Failure to Follow the Code

An employee's failure to follow the Code of Conduct may result in serious consequences, up to and including termination, criminal charges, required reimbursement for losses or damages, or reporting to a governmental authority.

- We have a responsibility to perform our job in an honest and ethical way.
- We have a duty to recognize any shortfall or error, no matter how small or insignificant.
- Any COMCARE staff member who hears or sees a problem or issue must bring it to the attention of an appropriate manager or to the compliance department.
- We encourage discussion of issues and concerns by all employees without any fear of retaliation.

Act with  
**Integrity**



Compliance Hotline:  
**316-660-7787**

COMCARE of Sedgwick County

## Identifying Concerns

If you are uncertain whether to report an actual or potential concern, consider the following questions:

- Is this issue in conflict with the COMCARE Code of Conduct, values, policies, and procedures?
- Would others question this issue?
- Are you repeatedly asking yourself how to handle the issue?
- If you answer "yes," to any of the questions, please confer with a supervisor for further guidance.

### Non-Retaliation

- COMCARE of Sedgwick County does not allow any form of retaliation against an employee who reports a suspected violation in good faith, participates in an investigation, or makes a report to a supervisor, the human resources office, the compliance officer, or the compliance hotline.

# "Ethical Conduct"

means doing the right thing.

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Compliance Hotline - 660-7787



COMCARE  
A Licensed Community Mental Health Center

*Sedgwick County...*  
*working for you*