

ORGANIZATIONAL PROCEDURE

PROCEDURE # 9.1 A	EFFECTIVE DATE	REVISED DATE
TITLE: CODE OF CONDUCT DISTRIBUTION AND TRAINING	7/21/2022	
ATTACHMENT TO	REVIEW DATES	
POLICY #: 9.1	7/21/2023	
POLICY TITLE: CORPORATE COMPLIANCE		
CHAPTER: COMPLIANCE		

I. PURPOSE

The purpose of this procedure is to articulate the Lakeshore Regional Entity (LRE) processes related to the Code of Conduct. Specifically, how it is distributed and the training that LRE employees complete in accordance with the Code of Conduct.

II. PROCEDURE

The Code of Conduct serves to function as a foundational document that details the fundamental principles, values and framework for action within LRE compliance program. The Code of Conduct articulates Lakeshore Regional Entity' commitment to comply with all applicable Federal and State standards. The standards not only address compliance with statutes and regulations, but also set forth broad principles that guide employees in conducting business professionally and properly. The standards included in the Code of Conduct will promote integrity, support objectivity and foster trust. Furthermore, the LRE standards of conduct will reflect a commitment to high quality health care delivery, as evidenced by its conduct of on-going performance assessment, improved outcomes of care and respect for the rights of Lakeshore Regional Entity' customers.

- A. Standards of Conduct are included in the LRE's organizational policies, Compliance Plan and Code of Conduct and Ethics.
 1. These documents are reviewed and approved on an annual basis in compliance with the policy promulgation policy and procedures.
 2. LRE staff are responsible for staying informed on the standards of conduct, policies and procedures and requirements pertinent to their role(s).
 3. The Chief Compliance Officer will conduct additional training activities as necessary to remind staff of standards.
 4. The Chief Compliance Officer will report activities taken to ensure compliance with the standards of conduct as part of the annual Compliance Program Effectiveness Assessment.

- B. Code of Conduct and Ethics

The Code of Conduct and Ethics is a foundational document that explains the company's commitment to ethical and legal standards and sets expectations for the staff in achieving and maintaining standards.

1. Code of Conduct and Ethics Development and Amendment

- i. The Executive Leadership Committee, in conjunction with the Chief Compliance Officer is responsible for the development and review of the Code of Conduct and Ethics.
- ii. The Board of Directors shall review and approve the Code of Conduct and Ethics annually including any proposed amendments.
- iii. The Chief Compliance Officer is responsible for ensuring all staff are informed of any changes to the Code and for ensuring employees have the opportunity to receive technical assistance regarding the application of the Code. Changes will be shared with LRE staff and LRE Board members after they are approved by the Board of Directors. All LRE staff and Board members will be trained on the changes.

C. Distribution and Training

1. Staff are trained on the Code of Conduct and Ethics upon hire (within 30 business days), and annually thereafter through distribution and training on the following:

- i. Corporate Compliance Plan;
- ii. Code of Conduct and Ethics; and
- iii. Applicable policies and procedures.
- iv. New Hire/Annual Training Attestation Process
- v. All staff will attest that they have reviewed the required trainings and agree to abide by the Code of Conduct and Ethics.
- vi. Attestations will be maintained in the staff's personnel file.
- vii. New hire and annual trainings are completed in compliance with the LRE Human Resources Training and Development policy
- viii. The Human Resources Director and Chief Compliance Officer will make recommendations/coordinate follow up actions or disciplinary actions for staff that fail to complete the new hire or annual trainings on time.
- ix. In the instance that LRE staff require individual coaching or training regarding the Code of Conduct and Ethics it will be documented in their personnel file.
- x. All attestations and trainings will be maintained in accordance with the documentation retention policy.

2. Board of Directors

- i. Upon appointment and annually thereafter, all Board Members will attest that they have reviewed the trainings and agree to abide by the Standards of Conduct outlined the following:
 - a) Corporate Compliance Plan and

- b) Code of Conduct and Ethics
 - ii. Attestations and trainings will be maintained in the Board Member's file.
 - iii. The Compliance Officer and Board Chair are responsible for ensuring orientation and annual trainings are completed on time.
- 3. Development of Training Materials
 - i. The Chief Compliance Officer is responsible for the oversight and retention of compliance training materials in accordance with the documentation retention policy.
 - ii. The Chief Compliance Officer will arrange and administer updated training annually to all LRE personnel. Failure to attend or receive such scheduled training will be subject to disciplinary action and/or an action plan for immediate compliance.
- 4. Training Timeliness
 - i. Failure of any personnel to review and accept the LRE Code of Conduct and Ethics and Compliance Plan within thirty days (30) days of the employee's hire date shall be reported to LRE's Chief Compliance Officer. Personnel shall respond with a signed and dated Code of Conduct and Ethics Training acknowledgement statement, if completed, or by a corrective action plan for immediate compliance.
 - ii. Failure of any personnel to complete the annual trainings within (30) days of the time it is offered shall be reported to LRE's Chief Compliance Officer. Personnel shall respond with a signed and dated training acknowledgement statement, if completed, or by a corrective action plan for immediate compliance.
- 5. Reporting Violations
 - I. Staff and Board Members are required to report violations of the standards of conduct to the Chief Compliance Officer through the resources outlined in the Compliance Plan. Staff and Board Members may request to have their report be kept confidential.
 - II. Staff and Board Members are encouraged to ask questions and seek technical assistance from the Chief Compliance Officer on the application of the standards of conduct relevant to specific situations.

III. APPLICABILITY AND RESPONSIBILITY

This procedure applies to all LRE staff and operations, LRE contract providers, and LRE Board Members.

It is the responsibility of the Chief Compliance Officer to oversee all elements of the Code of Conduct and Ethics training and distribution.

It is the responsibility of each supervisor to ensure that the personnel within their supervision are aware of and are acting ethically and in compliance with applicable laws and the Code of Conduct and Ethics.

IV. MONITORING AND REVIEW

The Chief Compliance Officer, in conjunction with the Chief Executive Officer, will review this procedure on an annual basis.

V. DEFINITIONS

None

VI. RELATED POLICIES AND PROCEDURES

- A. Corporate Compliance Policy
- B. Lakeshore Regional Entity Code of Conduct
- C. Lakeshore Regional Entity Compliance Plan
- D. 8.8 Human Resources Training and Development Policy
- E. 9.3 Retention of Records Policy

VII. REFERENCES/LEGAL AUTHORITY

- A. 42CFR, Ch. IV §438.608
- B. Federal Register Volume 64, No. 219

VIII. CHANGE LOG

Date of Change	Description of Change	Responsible Party
7/22/22	New Procedure	Chief Compliance Officer
7/22/23	Annual Review	CEO/Designee