

Code of Conduct and Disciplinary Standards

It is the policy of Community Based Care Integrated Health (CBCIH) to maintain a posture of positive motivation with employees and sub-contractors; to treat all employees and sub-contractors fairly, consistently and equally; and to administer corrective action, where necessary, on a consistent basis.

Code of Conduct

CBCIH and our Lead Agency sub-contractors should conduct themselves in a manner that is consistent with the NAHQ Code of Ethics which includes, but is not limited to, the following:

- Practicing with honesty, integrity, and accountability
- Seeking the trust and confidence of all consumers and stakeholders
- Respecting all laws and avoiding involvement in any false, fraudulent, or deceptive activity
- Promoting the right of privacy for all individuals and protecting the maintenance of confidential information to the fullest extent permitted by law
- Using expertise to inform employers or clients of possible positive and negative outcomes of decisions in an effort to facilitate informed decision making
- Giving credit for the work of others to whom it is due
- Aiding the professional development and advancement of colleagues

The Code of Conduct is published on the CBCH website (www.cbcih.com) and is reviewed with new CBCIH employees and with CBC Lead Agency Behavioral Health Care Coordinators and Nurse Care Coordinators.

Disciplinary Standards

CBCIH staff are Embrace Families employees and, as such, are required to adhere to policies related to Embrace Families, Employee Conduct and Corrective Action and CBCIH Policy CC-1206, Personnel, Background Screenings and Sanctions.

CBC Lead Agency sub-contractors should adhere to their individual organization's Code of Conduct and subsequent policies and procedures related to disciplinary actions. CBC Lead Agencies are considered "downstream" entities from Sunshine as the main contractor for Medicaid/Medicare, and as a downstream vendor, certain additional requirements are applicable, as indicated within the Florida Managed Medical Assistance Program Services Agreement and in accordance within the CBC Lead Agency Annual Contract Compliance Attestation.

- CBCIH and CBC Lead Agency Sub-contractors shall adhere to disciplinary standards which include the requirement to assist with resolving non-compliant issues. They must also reflect the organizations commitment to work with regulators/law enforcement in full to ensure investigation and resolution of identified issues, and specify that failure to adhere to these standards may result in termination.
- Immediate and consistent discipline will be enforced for violations of laws, regulations, standards, policies, and practices. Anyone committing violations will be subject to discipline appropriate with the severity of the violation, including:
 1. Initiation of a Performance Improvement Plan, detailing corrective actions (if applicable)
 2. Suspension or Termination of the contract
 3. Revocation of access to information systems associated with the contract.
- A Performance Improvement Plan, citing corrective actions, may be requested by CBCIH in situations where the organization's or an individual's behavior or work performance does not meet CBCIH standards. Examples that may require corrective action and/or other disciplinary action include but are not limited to:
 1. Failure to meet educational requirements, maintain licensure, etc. for staff who are responsible for providing services in accordance with the contract

2. Determination that there is a lack of compliance with contractual obligations, as observed and documented during CBCIH quarterly monitoring visits
- Disciplinary problems that are related to work performance or conduct, and arise out of suspected alcohol or drug abuse, shall be the responsibility of the Subcontractor
 - CBCIH will promptly, thoroughly, uniformly, and objectively investigate and resolve suspected non-compliance or wrong-doing by a CBC Lead Agency.