



Compliance Program Manual

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Introduction

Valued workforce members,

Centria Healthcare, Centria Autism Services, and Life Skills Autism Academy (collectively referred to as “Centria” or “Company”) provide its clients with high quality services. We enjoy a reputation of integrity and excellence in the communities that we serve. This reputation is one of our greatest assets. Our achievements depend on the trust our clients and professional associates place in us. To this end, it is the policy of Centria that all individuals conduct themselves with integrity. Individuals must act in conformance with all legal requirements, as well as Centria’s policies, procedures, and Code of Conduct.

To outline Centria’s expectations in this area, we have implemented a formal Compliance Program. It is the intent of Centria for team members, volunteers, students/interns, business associates and contractors (team members or workforce) to use this Compliance Program as a guide in furtherance of Centria’s continuing good-faith efforts in complying with applicable federal, state, and third-party payor laws, rules, regulations, and policies.

This Compliance Program Manual (referred to as “Manual”) is designed to provide team members with basic information regarding Centria’s Compliance Program, Code of Conduct, common compliance issues, and the ways that team members can report any compliance concerns. Centria believes that properly educated team members will do the right thing because they know the right thing to do.

Centria’s Compliance Program

It is important that team members understand the primary reasons why Centria has a Compliance Program.

First, we have many types of government contracts across the country. Because of our government contracts, it is critical we follow all laws and regulations to avoid legal consequences or loss of business.

Second, if we violate the regulations, we could become excluded from participating in government contracts. This would mean that we cannot process claims to government payers or do business with other providers with government contracts. Other potential consequences include but are not limited to criminal prosecution, substantial fines, and suspension on new business for our Company.

Third, having a compliance program is the right thing to do. It demonstrates our commitment to the highest degree of business integrity that is expected of companies and participants in local, state, or federal programs.

Seven Elements of an Effective Compliance Program

Centria's Compliance Program is modeled after the outline of the Federal Sentencing Guidelines. By successfully following the Guidelines, companies accused of criminal conduct can substantially reduce any federal fines or penalties that may be imposed.

In 1991, the Federal Sentencing Guidelines for Organizations outlined corporate guidelines for an effective compliance and ethics program. More recent updates to the Guidelines detail how organizations should promote a culture that encourages ethical conduct.

Based on the Federal Sentencing Guidelines, the Office of Inspector General for Health and Human Services has outlined Seven Elements of an Effective Compliance Program. Those elements are:

1. Standards of Conduct

Centria's Code of Conduct provides team members with guidance on appropriate workplace behavior and describes how to submit reports regarding workplace practices that may violate Company policies. Each team member should receive a copy of the Code of Conduct during the new-hire process. It is also available on the PULSE as well as Centria's public website. We will discuss the Code in more detail later in this Manual.

Although our Code of Conduct applies to all of Centria's different services and supports, it does not replace the Company's operational policies and procedures. Team members must still be familiar with these policies and procedures. Team members can access the Compliance Department's policies and procedures by using the links provided in **Appendix A** of this Manual.

2. Oversight

Centria has a Chief Compliance Officer who reports directly to the CEO of the Company. The Chief Compliance Officer also reports to the Compliance Committee of Centria's Board of Directors. Centria employs a team of compliance professionals that are available to assist team members with their compliance concerns.

3. Education and Training

Team member education is also a key element of Centria's Compliance Program. To have an effective program, team members must be educated about the role and functions of a company compliance program. This involves teaching team members how to resolve unclear situations properly by referring to the Code of Conduct, policy manuals or contacting the appropriate individuals in the Company. Centria provides compliance training to team members at the time of hire and throughout their employment as required.

4. Auditing and Monitoring

For a Compliance Program to be effective, both old and new procedures and systems must be reviewed on a regular basis. Within the Compliance Department, the Internal Audit Team has primary responsibility for monitoring and auditing Centria's business processes.

5. Reporting Process

A critical element of Centria's Compliance Program is the compliance reporting process. Team members are encouraged to first report their concerns to their supervisor using the local chain of command. However, if this does not provide the assistance needed or the issue continues, then team members can contact the Compliance Team for assistance.

For issues that are not compliance-related, Compliance Services may re-direct communications so that the appropriate people receive the information.

To report a compliance concern, team members may email the Compliance Department at CorporateCompliance@centriahealthcare.com. We will discuss the team member reporting requirements in more detail later in this Manual.

6. Response and Prevention

To demonstrate program effectiveness, Centria's Compliance Department investigates reported issues objectively and with respect for all parties.

All allegations will be taken seriously, but maliciously false accusations and/or repeated misuse of the compliance reporting process will be addressed through corrective action.

When a violation is found, the Compliance Department will continue to monitor the matter's resolution to ensure corrective measures have been taken to prevent future recurrence of the violation.

7. Enforcement and Discipline

Centria believes that team member discipline should be fair, consistent, and appropriate. Effective compliance programs ensure that team members who commit similar offenses receive similar corrective actions.

Code of Conduct

Centria's Code of Conduct was created to set standards of conduct and to summarize basic legal principles and policies for team members. It provides guidelines and direction on how to identify a compliance issue and how to raise questions or report workplace practices that may violate company policies or procedures.

In 2021, Centria revised the company's Code of Conduct for its workforce. The Code of Conduct outlines and establishes Centria's standards for honest and ethical business conduct and workplace behavior. Although the implementation and enforcement of the Code of Conduct and Compliance Program is directed by the Compliance Department, *every member of Centria's workforce is responsible for ensuring compliance*. All team members must abide by the standards set forth in the Code of Conduct.

Click on this link to Centria's [Code of Conduct](#) to access, view, or save it to your computer or mobile device.

Compliance Guidance for Centria's Workforce

Service Documentation

Every day, Centria team members provide essential services to clients that will help them reach their highest level of independence. As a result, timely and complete documentation is required to receive payment for the important services that we provide. Service record documentation, which is a collection of information about persons receiving services, is both a confidential and legal record of services provided by our team members. These records should contain facts and observations about clients including past and present services, assessments, referrals, interventions, and outcomes.

It is not possible to provide a complete list of things that must be documented in every situation or for every type of service. However, there are a few standard documentation principles that apply in nearly every situation. For instance, if a service note was not completed, then we will not be able to bill or collect payment for the service - it is just like the service never happened. If the service was recorded incorrectly, then it happened incorrectly. Funding sources, auditors and investigators will want to see records which demonstrate timely service to clients in compliance with the regulations and our contract requirements. With this in mind, our service documentation must be:

- Factual - Documentation should reflect the things you do, see, or hear. Our narratives should focus on the facts and avoid unnecessary opinions. For instance, we should avoid writing, "Jane was lazy today." Instead write, "Jane had trouble focusing and following directions to complete trials. She required several prompts to remain on task."

- **Timely** - The most accurate service notes are those recorded or written fairly soon after interacting with clients, preferably as you are performing the service or before the end of your shift. Service progress notes should be completed within the timeframe as stipulated in Centria policy.
- **Accurate** - Notes should reflect the exact start and stop time of each session and the location where the service was provided. If you arrive late for your shift, the start time should reflect the time you started working with your client and not the time you were supposed to start your shift. If your session ends early, the session end time should reflect the exact time your session ended and not the time the session was supposed to end.
- **Complete** -- Do not leave any section blank, even if it does not seem to apply to your assignment or the person receiving services - you can always write, "Does not apply" or "N/A" in these situations. If you abbreviate, make sure it is a standard abbreviation with no possibility of having more than one meaning.
- **Consistent** with legal, contractual, and regulatory requirements - The services we provide should match the goals outlined in the Treatment Plan. It is required that team members provide original and unique documentation and avoid "cookie cutter" entries. Rather, notes should provide detail to show the individualized nature of the services provided.

Under all circumstances, team members should **NEVER**:

- Enter service notes that suggest an individual received services that were never provided;
- Document services were provided in a way that is different than the way they were actually provided;
- Document a service before it was actually provided;
- Fail to record an accurate date/time/signature/job title for your service notes;
- Record therapy session time while transporting a client to or from a therapy location;
- Provide opinions without facts or outcomes for an individual receiving our services;
- Tamper with a service record by adding, removing, or changing existing documentation.

For a quick reference to Centria's service documentation "red rules", refer to **Appendix C** of this Manual.

Accounting for Time Worked and Time of Service

Service documentation should reflect the exact start and stop time services are provided to the client. Team members should not "round" time to the closest billable unit or add service times together that were separated by a non-billable break in services - this is something our billing staff will handle in accordance with the rules outlined in the payer contract. Properly recording service time may result in additional time that you worked that is not reflected in the service documentation. Time worked that is not direct services should be documented through Centria's timesheet process.

For example, you may be asked to pick up a client at home for transportation to/from a center location. The drive time to/from the center should NOT be included as service time with the client. The transportation time would be considered time worked and you will be paid for this time, but it should not be included in the session time you enter in your iPad.

Reporting Errors in Service Documentation

If you realize your service documentation did not reflect the correct time, date, or services you provided to your client, please take immediate action by notifying your supervisor. Your supervisor will provide guidance on next steps for

correcting the issue. If the service has already been billed to a payer source, the issue must also be reported to the Compliance Department for review (CorporateCompliance@CentriaHealthcare.com).

If the Compliance Department initiates an investigation involving inaccurate time reporting, Centria requires all team members to be honest and forthcoming with any errors or inaccuracies that have occurred. Though an investigation may result in an employment action, there are other legal consequences that can occur if you are not truthful regarding your actions, including the loss of one's license or certification and/or criminal charges.

Fraud Prevention

There has been an increase in new legislation related to false claims and health care fraud enforcement. This section of the Manual highlights Centria's efforts to prevent fraud, waste and abuse of the government resources that fund many of the services we provide. We will also discuss our efforts to prevent the waste and abuse of company resources as well as those of individuals who receive our services.

What is Fraud?

Fraud and related misconduct involve a deliberate act or a deliberate failure to act with the intention of obtaining an unlawful or unfair advantage. This can include:

- Bribery and the illegal giving or accepting of gifts;
- Stealing of funds, supplies or other assets;
- False statements on documents;
- Illegal actions by clients, vendors, or other related parties.

Federal and State Laws

Perhaps you have heard newscasts that discussed details of a team member or former team member "blowing the whistle" on some illegal or inappropriate actions of his/her company or former company. The Federal False Claims Act (FCA) is also known as "The Whistleblower Act" because it authorizes private individuals to file whistleblower lawsuits on behalf of the government against those who make false claims for payment. This law protects those who file "good faith" complaints and provides penalties for those who file frivolous or harassing lawsuits. In addition, some states have their own false claims laws that meet or exceed the federal law. A list of these laws for the states in which Centria operates has been provided in **Appendix B** of this Manual.

For many years, prosecutors have used the False Claims Act to combat fraud in cases in which the delivery of health care services does not meet federal and/or state regulatory requirements. Recently, new federal and state laws have been enacted that strengthen the False Claims Act and address other types of fraud including:

- Failure to repay government overpayments in a timely manner;
- False claims made by a company's contractors or subcontractors.

All Centria team members, as well as our contractors who provide Medicaid covered services, must receive a copy of our [Fraud Prevention Policy](#). Workforce members can access and download this policy by clicking above or by accessing the Compliance link on Centria's public website.

Team member Rights and Protection

Team members have a responsibility to report concerns about actual or potential misconduct either witnessed or suspected. Both direct and anonymous reporting mechanisms are available to all Centria team members to assist in meeting this responsibility.

Centria's [Prohibition of Retaliation for Reporting Compliance Concerns Policy](#) protects team members, who in good faith, report known or suspected instances of inappropriate business conduct or activities that violate local, state, or federal regulations or the Company's Code of Conduct. Management, supervisors, or other team members are not permitted to engage in retaliation, retribution or any form of harassment or discrimination directed towards a team member who reports a good faith compliance concern. Any member of Centria's workforce who experiences retaliation as a result of their reporting responsibilities should immediately report the matter to the Compliance Department.

Compliance reporting processes are NOT intended to replace your local supervisor or existing channels for reporting workplace incidents, conflicts with co-workers or employment-related concerns. These matters should be reported to your supervisor, operational management, or Centria's Human Resources Department in accordance with Company policies and procedures.

Any person who purposely reports false information or attempts to settle personal grievances by making false reports or repeating reckless gossip will be subject to corrective action.

Centria's Fraud Prevention Initiatives

Centria is committed to preventing fraud, waste or abuse of resources belonging to the company or individuals we support. Team members should disclose their own errors immediately after discovery. However, team members should not conduct their own investigations, but should report concerns to their supervisors and the Compliance Department.

Investigators have full access to all Centria records and grounds, and they have the authority to review all company property, including physical files or computer storage. Investigators can gain access without prior knowledge or consent of the team member whose file is being reviewed. Confirmed incidents of fraud are reported to executive leadership, including the General Counsel and Board of Directors.

Immediate disclosure of discovered errors helps to ensure that the company does not unintentionally bill for services it has not provided. Team members should refer to Centria's [Fraud Prevention Policy](#) for further details regarding the company's fraud prevention procedures and fraud detection tools.

Best Practices for HIPAA Compliance

All Centria team members receive training on the Health Insurance Portability and Accountability Act, or "HIPAA" as it is commonly called. It is important for team members to periodically review the basics of the law and some of Centria's best practices for HIPAA compliance. There are several key things that all Centria team members should know and do about HIPAA as they perform their job duties. For detailed guidance, team members are encouraged to review Centria's policy on [Permitted Uses and Disclosures of Protected Health Information](#).

Under HIPAA, Centria and its team members have an obligation to safeguard the protected health information (PHI) of the people who receive our services. *PHI is any medical or behavioral health diagnoses, clinical assessments, treatment*

progress notes, testing results or any other information related to our clients' past, present or future health or health treatment services, where a client is individually identified. Information that individually identifies a client includes things like their name, DOB, address, or photo. In fact, HIPAA outlines eighteen (18) specific client identifiers that can make health information PHI. While you do not have to memorize all of them, it is important to remember that information can still be PHI even when a client's name is never listed or shared.

The following are some best practice tips that can assist in protecting PHI:

- Do not access any Centria client's PHI unless you need it to perform your job;
- Do not discuss Centria clients outside of your paid work setting or work-related activities;
- Do not leave PHI unattended so that others can view it. Cover any papers or notes and lock your computer screen when you walk away from your work area. Secure electronic devices (iPad, iPhone, USB drives, etc.) when not in use. PHI in any format should be maintained in a locked drawer or cabinet when you end your workday. If traveling with PHI in your vehicle, it should always be concealed during transport and locked away or taken with you when you exit the vehicle. Team members should not leave electronic devices in their vehicle overnight;
- Secure any PHI you have on personal devices. It is not a violation to access client information on a personal device (such as a mobile phone, laptop, or home computer), but team members should avoid storing clients' PHI on personal devices whenever possible. If you need to download or save PHI on your personal device to perform your job duties, you must also take adequate steps to keep the PHI secure;
- Permanently delete the PHI from your personal device when it is no longer needed. Creating and requiring an access password or PIN for your device is an easy way to secure confidential information. Some mobile devices allow users to set a passcode or require facial recognition to access specific notes or files. In addition, team members should avoid using client names or other identifiers in their device contacts or address book. You should also not take or save photographs or videos of your clients with your personal devices.

If you are not sure if a person is authorized to have a client's PHI or you do not know who the person is, contact your supervisor or the Compliance Department for direction before sharing any information.

While there are circumstances where PHI might be shared with others without first getting a parent or guardian's consent, those situations are rare. The list below includes the most common or likely reasons this might occur:

- Payor audits or oversight agency investigations;
- Subpoenas or court orders;
- Police, EMS, or hospital staff to assist a client who has a medical emergency; and
- Reports of abuse/neglect to the appropriate agencies, such as Recipient Rights or Child Protective Services.

When PHI is disclosed in one of the above situations, team members must document the disclosure on an Accounting for Disclosures form and load it into the client's record. If you have questions about whether to disclose information in a particular situation, please consult your supervisor or Centria's Compliance Department.

In 2009, the Health Information Technology for Economic and Clinical Health Act (commonly known as "HITECH") placed additional requirements on companies who fail to protect their clients' PHI. Whenever PHI is accessed, used, or disclosed improperly, this results in a HIPAA *violation*. A serious violation involving a client's personally identifiable information or other PHI is known as a HIPAA *breach*.

If you believe a HIPAA violation may have occurred, you are required and responsible for immediately reporting the issue to your supervisor and the Compliance Department. Time is of the essence - if it is ultimately determined that a breach of PHI has occurred, Centria has a limited time to send out the required notification letters to those who were impacted by the breach. Failure to meet these timelines can result in severe civil and criminal penalties for both the Company, and in some cases, our individual team members.

The organization that oversees HIPAA compliance is the Office for Civil Rights (OCR). The OCR understands that a breach of PHI can happen due to common errors or simple mistakes. While we should always strive to protect our clients' PHI, it is a far greater error to ignore a potential violation or to fail to report it. The most severe penalties on companies relate to the failure to report a breach or the failure to take steps to correct or minimize the risks associated with it.

We can all work together to keep our clients' information safe and secure. Failure to follow the best practices outlined above does not necessarily mean a violation or a breach has occurred, but following these tips reduces the risk that one will. Above all, please keep the following simple messages in mind:

1. Use PHI for legitimate work purposes only;
2. Always keep PHI private and secure;
3. When finished, delete electronic PHI from personal devices and return paper PHI to Centria for proper storage or disposal;
4. Encourage other team members to do the same.

Conflicts of Interest

Team members are obligated to conduct Centria's business in an honest and ethical manner. This includes the ethical handling of actual or apparent conflicts of interest between personal and professional relationships.

A conflict of interest occurs when a team member's personal or private interests interfere in any way with the interests of Centria. A conflict of interest may also exist if the demands of any outside activities distract you from the performance of your job or cause you to use Centria's resources for a non-Centria purpose.

Examples of conflicts of interest include, but are not limited to:

- Personal or family financial interests in an enterprise that has business relations with Centria;
- Receiving improper personal benefits as a result of one's position with the company;
- Ownership by a workforce member of a significant financial interest in any actual or potential competitor or third party;
- Performing services for any actual or potential competitor or third party without approval of Centria management;
- Engaging in outside business activities that detract from or interfere with your responsibilities to Centria or our clients;
- Serving on a public body or in an organization whose interests may limit or interfere with Centria's business interests;
- Using work time or Centria resources in pursuit of personal activities which interfere or compete with Centria's business;

- Accepting or providing gifts to/from clients or their family members, as well as selling, buying, or lending items to clients or their family members;
- Purposefully offering or paying remuneration to induce or influence referrals for services payable by any federal healthcare program.

You must remain free of conflicts of interest for the proper performance of your job responsibilities. Team members should not engage in any activities that conflict, or might appear to conflict, with the interests of Centria or its subsidiaries. Team members should notify Centria's Compliance Department of any information about any actual or apparent conflicts of interest involving team members or others with respect to the Company.

Maintaining Professional Boundaries with Individuals Receiving Services

Boundaries help clients feel safe and help establish relationships built on trust and confidence in the skills and expertise of the Centria team members who support them. It is important to always remember that Centria's team members, not our clients or their family members, are ultimately responsible for maintaining professional boundaries. At the onset of a relationship with a client, a team member can define boundaries and create a safe environment by explaining his/her role and responsibilities to the client and client's family members. A team member's focus must always remain on the client and should never shift from the client's needs to the team member's own needs.

To maintain professional boundaries, team members should avoid the following behaviors:

- Over-sharing personal information: Any personal information that a team member shares with a client or client's family members should be provided for the client's welfare and related to the client's goals – for example, a personal story that demonstrates an example or teaches a lesson related to the client's situation. Team members should not share personal information because they need someone to talk to or need someone to help them feel better. Team members should also never discuss negative feelings about their jobs, the Company, or co-workers with clients or their family members. Team members should not interact with clients or their family members through social networking (such as "friending" a client on Facebook or tagging them in posts). If a team member is unsure whether personal information will benefit a client, then he/she should take the cautious approach and not share the information.
- Borrowing or accepting money or personal property: Team members should never have any type of personal gain at the expense of a client, even when doing so is the expressed wish of the client or client's family members. Clients or family members may want to "help out" a team member by loaning a car or money to pay bills, or they may offer to "sell" a team member something he/she needs at a price far below reasonable value or on "credit" until the team member can afford to pay. Taking advantage of these situations puts the team member's interests above the client's and diverts focus from the client's needs.
- Over-involvement with a client: Sometimes good intentions can lead to crossed professional boundaries. At times, team members may feel especially protective of or responsible for a particular client. However, as professionals, team members must ensure that they are not becoming too personally involved with their clients. Over-involvement occurs when team members offer to assist a client outside of their job-related role. Some examples include babysitting a client, lending money to a client or family member, providing

transportation for non-treatment activities, or believing that no one else can truly meet the client's needs. These types of things indicate over-involvement with a client or his/her family.

- **Developing a personal relationship with a client:** While team members should be friendly with clients, they should not be friends with them. Social relationships with clients and/or their families violate professional boundaries. Engaging in any type of physical or sexual relationship with clients or their family members is always inappropriate. In addition, visiting a client when off-duty, engaging in personal phone calls or texts, and communicating through social media (such as Facebook, Instagram, Snapchat, TikTok, etc.) are also violations of professional boundaries and Centria's policies. Furthermore, team members should always inform their supervisor before providing any services to an individual with whom they have a previously established personal, social, or family relationship.
- **Showing favoritism:** While it is human nature to prefer some people over others, in the type of work we do at Centria, avoiding favoritism is critical. Special favors, gestures or personal gifts provided to some clients and not to others may create disappointment and resentment in those clients who do not receive the same special attention. This can cause our clients to no longer view their service provider as objective. Furthermore, team members should also avoid creating nicknames or using terms of endearment with clients (such as "Baby" or "Honey") because these actions might suggest favoritism or might offend those receiving our services.

Of course, many other behaviors may also cross professional boundaries. The examples above are provided to illustrate boundary issues, but they are not all-inclusive of professional boundary violations. Team members should always use common sense in interactions with clients and should ask themselves these questions before engaging in any behavior:

- Is this behavior in line with Centria's policies and Code of Conduct?
- Does this behavior show respect for the client's rights?
- Is this behavior in the client's best interest?
- Does this behavior meet the client's needs?
- Would I engage in this behavior with all other similar clients?
- Would I feel comfortable talking with my supervisor about this behavior?

If the answer to any of these questions is "no," the team member should not engage in the behavior. Team members with questions or concerns about professional boundaries should speak with their supervisor, HR Representative, or a member of Centria's Compliance Department.

Managing Gifts or Gratuities Involving Clients and Outside Parties

Centria team members who provide services to our clients are our first representatives and have direct access to clients and family members who are grateful for our team member's hard work and dedication. Occasionally, a client or family member wants to show their gratitude with a gift or some type of gratuity. While team members are welcome to accept and express verbal gratitude, it is against our policy to accept gifts, cash, or services from our clients. It is also against our policies to give personal gifts, cash, or personal services to our clients.

Gifts to or from Clients, Family Members, or Guardians

Centria PROHIBITS team members from accepting money or gifts from individuals we serve, their family members, or guardians. This includes loans of money or the temporary use of personal property belonging to a client or family members. Team members should make clear that compensation (of any type) for services provided to the person served is limited strictly to the financial agreement established in the contractual agreement or authorized services from funding source / insurance. If team members receive a gift or are asked to accept a gift, they must report it immediately to their manager/director.

Centria recognizes that there are certain exchanges between a team member and a client that are part of the client's treatment plan or a natural part of building a trusting, therapeutic relationship. Typically, acceptable exchanges between a team member and a client would be:

- Giving educational or treatment-related items of minimal value (\$15 or less) that is directly related to the client's treatment plan;
- Accepting personal or handmade items with no applicable market value;
- Offering/accepting modest refreshments (such as a bottle of water, coffee, soft drink, snack item, etc.) directly before, during or immediately following a provided service.

For example, a parent makes cookies during a home session and offers one to you. You could accept or decline based on your preference. However, taking home a batch of cookies for yourself and your family would not be acceptable. Taking a cookie without being offered would also be unacceptable, even if the parent had told you to help yourself to as many as desired.

While the specific exchanges highlighted above may be allowable under Centria policy, all licensed and certified team members are expected to abide by the ethical code and standards of their profession and licensing body. When this may differ from Centria policy, the more stringent requirements should be followed.

Gifts or Gratuities from Outside Parties

Team members may provide or accept an occasional gift of nominal value (sometimes known as "swag"), an inexpensive meal or a social invitation from outside parties provided it is:

- Legal;
- Infrequent in nature;
- In conjunction with an educational or business function;
- Consistent with industry and company practices;
- Not likely to be perceived as an attempt to improperly influence referrals or business decisions ("inducement").

It is always best to check with your supervisor and the Compliance Department prior to offering or accepting any gift from a payor, referral source, vendor, or another service provider.

Communicating with Clients

Centria's standard and accepted ways to communicate with clients include person-to-person phone calls, secure (encrypted) email, or U.S. Mail. It may be necessary, from time to time, to communicate with clients by your personal cell phone or other personal electronic device. You will find detailed guidelines for use of personal devices in Centria's policy for [Business Use of Personal Mobile Devices](#).

In an earlier section of this Manual, we learned that HIPAA outlines eighteen (18) specific client identifiers that are considered PHI. For this reason, it is difficult to communicate with a client without including some form of PHI - in fact, a person's email address or phone number used to establish the communication is itself a form of PHI. Therefore, it is important that team members use secured methods of communication to avoid potential HIPAA violations. Company-owned devices, including iPads and cell phones, typically use encryption to secure the transmission of PHI. On personal devices, the use of Centria's cloud-based applications can also prevent unauthorized access to PHI by outside parties. Generally speaking, team members may phone a client to discuss information that includes PHI since voice calls are considered a secured method of communicating.

Team members must understand that standard text messaging is not secured. Most common email accounts that are available to the general public, such as personal Gmail, Hotmail, or Yahoo accounts, are not secured either. If a client wishes to communicate by an unsecured method, such as texting, the client must provide written consent to Centria. The requirements for giving this consent are found in Centria's [Confidential Communications by Alternative Means Policy](#) and its associated form, [Request for Confidential Communication by Alternative Means](#). Team members must have the client fill out this form prior to engaging in any unsecured electronic communications such as text messaging or non-secured email. Once the signed form is obtained from the client or his/her guardian, team members must still take care to avoid the use of PHI when using unsecured methods of communication. For example, a technician can say, "Hi, this is John. Please call me as soon as possible," or "I need to reschedule my evening visit." Avoiding the use of a client's name, address, or any other identifying information, including references to Centria or a client's condition or treatment services, is a good rule to follow when texting a client or his/her family member.

Client Transportation

To maintain the safety of our clients and workforce, team members must understand and follow Centria's [Client Transportation Policy for Centria Autism and LSAA](#) and/or [Client Transportation Policy for Healthcare Services](#) policies and procedures prior to transporting any client in a personal vehicle. A brief summary of these policies is provided below:

ABA Services

The transportation services will only be provided from permitted points of origin to/from the location of the Centria ABA therapy services as follows:

- An active (established) client is permitted to be transported from/to permitted points of origin, which include, for example, home, school, a family's member's home, Centria Clinic location or other location approved by a supervisor;
- The transportation services will only be provided if the client's point of origin is within 50 miles of the location of the Centria ABA therapy services.

Healthcare Services

The transportation services will only be provided from permitted points of origin to/from the location of a medically necessary service provider as follows:

- An active (established) client can be transported from permitted points of origin (for example - home, school, a family's member's home, etc.) to/from the location of a medically necessary service provider (for example - doctor appointments, therapy appointments, pharmacies, etc.);
- The transportation services will only be provided if the client's point of origin is within 50 miles of the location of the medically necessary service.
- The Supervising Clinician is responsible for identifying the client's transportation needs.

To obtain authorization to transport clients, Behavior Technicians, HPFS or any other members of Centria's workforce providing transportation must agree to and adhere to the following requirements:

- A **Transportation Attestation Form** signed by the workforce member agreeing to abide by all of Centria's transportation requirements must be on file prior to transporting any clients;
- A **Transportation Consent and Agreement Form** must be on file, evidencing that the parent or guardian of the client has authorized transportation for the client;
- The workforce member must have a valid driver's license;
- The workforce member must have current automobile liability insurance in his or her own name;
- The workforce member must use his or her own personal vehicle (not commercial or borrowed);
- The workforce member must maintain vehicle safety, upkeep, and cleanliness;
- The workforce member must ensure that seatbelts are used by the driver and all passengers during transport. This includes proper installation and use of any child car seats or booster seats as required by state law;
- The workforce member must follow all applicable driving and safety laws while transporting clients. The workforce member will be responsible for all tickets and moving violations incurred while transporting clients;
- The workforce member is strictly prohibited from transporting a client to the workforce member's home or running personal errands during the transport of the client; and
- Therapy time may not be billed while driving clients. Billing for therapy may only commence upon arrival to the therapy location. This means that transportation time cannot be listed/billed as therapy time.

Note: If there are two members of Centria's workforce in the vehicle and an approved transportation therapy program is documented in the treatment plan, there may be some therapy services rendered; however, this must all be pre-approved and authorized with the payer.

If at any time, a workforce member is unable to uphold the requirements set forth in Centria's Client Transportation policies, he or she has an affirmative duty to notify Centria immediately and cease transporting clients.

Any misrepresentation of billed therapy time, or documentation involved in the transportation of clients will result in disciplinary action up to termination of employment.

Compliance Reporting Requirements

As part of Centria’s Compliance Program, every team member is required and has the affirmative duty to internally report any actual or potential violations of the law, regulations, or Centria’s Code of Conduct. This responsibility includes any violations that team members directly observe, or suspect based on things they have seen or heard. When situations like this occur, Centria expects you to report these things through the appropriate Compliance Program channels. Failure to internally report potential violations is a serious matter, and it can lead to disciplinary action, including potential termination of your employment.

There are several available options to make an internal compliance report:

- Send a confidential email to Centria’s compliance reporting system at CorporateCompliance@centriahealthcare.com;
- Submit a report through Centria’s website at <https://www.centriahealthcare.com/submit-a-complaint-or-violation>;
- Call the Centria Compliance Hotline at (866) 842-7126. This is the way to report concerns if you wish to remain anonymous. The Hotline is managed by a third-party vendor, and they will pass along your concern with no identifying information about you if requested.

When to Report an Issue

The following are examples (but not a complete list) of situations that a team member or supervisor would be required to internally report to the Compliance Department:

- Non-compliance with any law or regulation governing the services we provide
- Non-compliance with payor contract requirements
- Billing concerns (improper time reporting, improperly providing services, inaccurate documentation of services, intentional falsification of service notes or other billing documentation, improperly credentialed staff providing services, etc.)
- Safety concerns involving a client that involve an allegation of potential abuse/neglect/ exploitation of the client by a team member, or a client injury potentially caused by staff action or negligence. If the situation does not involve a specific client(s), then it is more appropriate for HR or Facilities via the TMSC. NOTE: All client injuries, regardless of the cause, should be documented and reported via a Centria Incident Report Form
- Professional boundaries concerns involving a client or client’s family. If the boundary issues relate to staff only, then it should be sent to the TMSC for escalation to HR
- Theft/misuse of company funds, property, or supplies by any Centria team member, department, or contractor
- Potential conflict of interest one of our team members or the company
- HIPAA Privacy or Information Security violations involving our client’s information. Any concerns about improper use or disclosure of team members’ information should be directed to the TMSC for escalation to HR
- Payor inquiries or member complaints regarding access or quality of services
- Harassment or discrimination of any client receiving our services
- Notification of investigation by any external entity - Payors, Police, CMS/OIG, Recipient Rights, etc.

- General Compliance/Privacy inquiries or requests for information

It is critical that you make internal report when required so that Centria can undertake a comprehensive internal investigation of the matter and take appropriate corrective action based on the results of the investigation.

Legal Inquires/Concerns

Centria's Legal Department now has its own ticket system for team member inquires, requests, and notifications: Legal@centriahealthcare.com. The following are examples (but not a complete list) of situations that you should internally report to the Legal Department:

- Any subpoena, formal request, or inquiry from an outside attorney or state Attorney General
- Any contact by police or other legal enforcement agency (FBI, ICE, Homeland Security, IRS, OSHA, etc.)
- Notice of Legal Demand or filed lawsuit against Centria or one of our team members
- Requests for a new contract or review of contract documents
- Any event that is likely to cause significant reputational or financial harm to Centria
- General legal inquiries or request for information

Contacting Your Compliance Department

It is the responsibility of every Centria team member to report any potential compliance violation or misconduct that they believe to be illegal or unethical. A team member who makes a compliance report in good faith will be protected from retaliation or retribution from any member of Centria's workforce.

Team members can report a potential compliance issue in several ways:

- Send a confidential email to: CorporateCompliance@centriahealthcare.com. The Compliance email address is the quickest and easiest way to directly share your concern with the Compliance Department;
- Submit a report form through Centria's website: <https://www.centriahealthcare.com/submit-a-complaint-or-violation>;
- Call the confidential hotline at **1-866-842-7126**. An outside vendor operates the Compliance Hotline, and it is available to team members 24/7. It is a good option for those who would like to remain anonymous.

When making a report by email, reporting form or the hotline, please provide a detailed description of the concern. This would include the location and any important dates, times, and names of those who are involved in the issue.

Centria's Non-Retaliation Policy

Centria has a strict [Prohibition of Retaliation for Reporting Compliance Concerns](#) policy. Specifically, any form of retaliation against a team member for making a good faith internal compliance report is strictly prohibited, Retaliatory behavior or actions by any Centria team member should be immediately reported to the Chief Compliance Officer or other member of the Compliance Department.

Review Process and Confidentiality

A Compliance Team member will review all reported issues to determine the best way to investigate the concern. Team members should not attempt to handle any suspected compliance issues on their own, including conducting their own investigation surrounding the issue or attempting to fix an issue on their own. Team members should not

discuss an allegation or compliance concern with any team member other than their supervisor or Compliance Department staff. The Compliance Department will treat all internal reports confidentially to the extent reasonably possible.

Reporting Potential Violations to Outside Agencies

Team members may exercise their rights and responsibilities to directly contact any regulatory authority, government agency or entity to report potential violations or make other disclosures required by law. Centria's reporting process is not intended to restrict, discourage, or interfere with communications or actions required or protected by state or federal law. However, reports such as these are not a substitute for Centria's internal reporting requirements. It is also necessary to report these matters through an appropriate internal reporting channel as well.

When making a report to any outside agency, team members are prohibited from sharing client or employee records without written permission. If a team member feels that confidential records must be provided as part of a report to an outside agency, an advance request should be submitted to Centria's Privacy Officer at CorporateCompliance@centriahealthcare.com for necessary approval.

To comply with mandated reporting requirements, team members may:

- Provide the minimum necessary client or team member identifying information to accomplish the report
- Summarize relevant factual information in a written personal statement or agency-required form
- Verbally share their actual observations or things that were reported directly to them

Team members can also report violations or complaints to Centria's independent accrediting bodies:

- Behavioral Health Center of Excellence (BHCOE) at <https://www.bhcoe.org/become-a-bhcoe/report-a-compliance-concern/> or by calling 310-627-2746.
- The Joint Commission at https://www.jointcommission.org/resources/patient-safety-topics/report-a-patient-safety-concern-or-complaint/?utm_content=dm-o-56.

Team members who are independently licensed or certified may also have an ethical responsibility to report alleged misconduct of a similarly licensed/credentialed individual to their respective professional board, such as the Behavior Analyst Certification Board (BACB - <https://www.bacb.com/contact-us/>). Team members should consult their applicable Code of Ethics for further guidance.

Reporting Suspected Abuse and Neglect

Centria does not tolerate abuse, neglect, or exploitation of the individuals we serve. If you are aware of any abuse, neglect, or exploitation of a Centria client, your obligation is to report it immediately to your supervisor and to the authorities as outlined in state law.

There are guidelines and time frames for reporting such incidents in each state, and it is very critical for you to follow the guidelines for your work location. If you are unsure of your mandatory reporting requirements, you may contact the Compliance or Legal Department for assistance.

Click on this link to Centria's [Internal Reporting Obligations and Investigations Policy](#) for more detailed guidance on workforce members' reporting requirements.

Reporting Client Incidents

Sometimes incidents occur when we are providing services to our clients. An incident is an unusual or significant event that disrupts or adversely affects the course of treatment or care of a client. Unusual or significant events should be identified on an individual case-by case basis and may be different based on individual client needs.

When a client incident occurs, team members must first ensure client safety prior to internal notifications or submission of an incident report. Team members should utilize their training, including the client's Foundational Plan, the client's Safety and Crisis Plan, First Aid/CPR training, and Safety Care Training (if applicable) to ensure client safety and de-escalation before attempting any internal reporting as outlined in this policy. In the case of a medical emergency, Emergency Medical Services (EMS) should be contacted.

Centria requires team members to immediately report incidents to their direct supervisor via a phone call or Google Chat. Depending on the type of incident that has occurred, further notifications to other Centria leaders may be necessary as well. Once all notifications have been made, team members must complete a Centria Incident Report form. When completing an Incident Report form, team members should describe the incident using ONLY factual information that was directly observed or reported to the person completing the report. Team members should refrain from giving opinions or forming conclusions that are the responsibility of the person investigating the incident. For additional information on incident reporting protocols, refer to the [Reporting and Managing Client Incidents Policy](#).

Conclusion

In today's environment of increased scrutiny by regulatory agencies and the public at large, organizations must be prepared to demonstrate that they take compliance directives seriously. An organization's commitment to a culture of compliance can be key in preventing misconduct and reducing the number of penalties imposed when compliance violations are detected. Centria's Compliance Department is instrumental in ensuring an environment where the prevailing goal is to "do right" for the people we serve. Through the efforts of each of our team members, Centria will continue to demonstrate the highest degree of business integrity that is expected of the leading provider of autism services and private duty nursing care for children.

Appendix A

Compliance Program Policies and Procedures

Category	Policy Name	Primary Stakeholders
Privacy	Accounting for Disclosures of Protected Health Information (CC.P+P.018.02)	Privacy Officer, Medical Records + Operations making the disclosure
Privacy	Amendment of Protected Health Information (CC.P+P.030.01)	Privacy Officer, Clinical Ops
Privacy	Breach Notification (CC.P+P.011.02)	Privacy Officer, Operations
Privacy	Business Associates (CC.P+P.019.01)	Privacy Officer, Leadership
Privacy	Business Use of Personal Mobile Devices (CC.P+P.026.02)	All Members of Centria Workforce
Privacy	Business Use of Third-Party Software Applications (CC.P+P.033.03)	Compliance, IT Security
Privacy	Client Access to Protected Health Information (CC.P+P.014.01)	Medical Records, Clinical Ops
Privacy	Confidential Communications by Alternative Means (CC.P+P.025.02)	Privacy Officer, Operations
Privacy	Designated Record Set and Legal Health Record (CC.P+P.015.01)	Medical Records, Clinical Ops
Privacy	Disposal of Protected Health Information (CC.P+P.017.02)	Medical Records, Operations
Privacy	Minimum Necessary Uses and Disclosures of Protected Health Information (CC.P+P.024.01)	All Members of Centria Workforce
Privacy	Permitted Uses and Disclosures of Protected Health Information (CC.P+P.020.02)	All Members of Centria Workforce
Privacy	Prohibition of Information Blocking (CC.P+P.021.02)	Privacy Officer, IT Security
Privacy	Recording Calls for Quality Review (CC.P+P.037.01)	All Supervisors/Managers
Privacy	Restrictions on Permitted Use and Disclosures of Protected Health Information Policy (CC.P+P.031.01)	Privacy Officer, Medical Records
Privacy	Retention of Medical Records and Protected Health Information (CC.P+P.016.02)	Medical Records, IT Security
Privacy	Social Media (CC.P+ P.028.4)	All Members of Centria Workforce
Privacy	Video and/or Audio Capture of Clinical Interactions with Clients (CC.P+P.027.02)	Privacy Officer, IT, Clinical Ops
Compliance	Client Transportation Policy	All Members of Centria Workforce
Compliance	Compliance Training for Centria Team Member (CC.P+P.022.03)	Compliance, Training, Management
Compliance	Corporate Compliance Program (CC.P+P.010.04)	Chief Compliance Officer
Compliance	Fraud Prevention (CC.P+P.009.04)	CCO/CFO, Leadership/Managers
Compliance	Internal Audit (CC.P+P.023.02)	Compliance
Compliance	Internal Reporting Obligations, and Investigations (CC.P+P.001.08)	All Members of Centria Workforce
Compliance	Michigan Recipient Rights Reporting + Investigation (CC.P+P.008.02)	Michigan Workforce Members
Compliance	Overpayments and Credit Balances (CC.P+P.029.02))	Compliance, Finance
Compliance	Prohibition of Retaliation for Reporting Compliance Concerns (CCP+P013.03)	All Supervisors/Managers/Leaders
Compliance	Reporting and Managing Client Incidents Policy (CC.P+P.039.01)	All Members of Centria Workforce
Compliance	Verification of Federal or State Healthcare Program Exclusions	Chief Compliance Officer
Publication	Code of Conduct (v2.2)	Privacy Officer, Clinic Managers
Publication	Compliance Program Manual (v2.1)	All Members of Centria Workforce
Publication	Marketing Compliance Manual (v2.0)	Marketing/Sales, Intake
Publication	Notice of Privacy Practices- Autism, Healthcare, and LSA versions (CC.F.011.01)	All Members of Centria Workforce

Appendix B

False Claims Act by State

	STATE	STATUTE	OIG CERTIFICATION	REVIEW DATE
1	Arizona	No State FCA - Ariz. Rev. Stat. Ann. §§ 36-2918 and 36-2957; Ariz. Stat. Ann. § 13-2311; Ariz. Rev. Stat. Ann. §§ 38-531 to 38-532; Ariz. Rev. Stat. Ann. §§ 23-1501 to 23-1502; Ariz. Rev. Stat. Ann. § 12-2-510	No	NA
2	California	State FCA - CA Govt. Code § 12650 - 12656	YES	1/25/2019
3	Georgia	State FCA - (Medicaid Only) O.C.G.A. § 49-4-168.1 - 168.6	YES	1/25/2019
4	Indiana	State FCA - Ind. Code §§ 5-11-5.7-1 through 5-11-5 -7-18	YES	12/28/2016
5	Maryland	State FCA - (Medicaid Only) Md. Code Ann. Health-General Title 2 § 2-601 (2014); (all other state claims) Md. Code Ann. Gen. Prov. § 8-101 et seq.	No OIG review	N/A
6	Massachusetts	State FCA - MASS Gen. Laws Ch. 12, §§ 5A-5O	YES	12/28/2016
7	Michigan	State FCA - (Medicaid Only) MCLS §§ 400.601 - 400.615	No	12/28/2016
8	Minnesota	State FCA - Minnesota False Claims Act, Minn. Stat. §§ 15C.01 through 15C.16	No	1/25/2019
9	New Jersey	State FCA - N.J. Stat. Ann. §§ 2A:32C-1-3	No	3/21/2011
10	New Mexico	State FCA - N.M. Stat. Ann. §§ 27-14-1 - 27-14-15	No	7/24/2008
11	North Carolina	State FCA - N.C. Gen. Stat. §§ 1-605-618; N.C. Gen. Stat. §§ 108A-70.10 to 70.16	YES	10/26/2018
12	Oregon	State FCA - ORS § 180.750-785	No OIG review	N/A
13	Texas	State FCA - (Medicaid Only) Tex. Hum. Res. Code Ann. §§ 36.001 - 36.132	YES	12/28/2016
14	Virginia	State FCA - Va. Code Ann. § 8.01-216.1 et seq.	YES	8/14/2018
15	Washington	State FCA - (Medicaid Only) RCW § 74.66.005 et seq.	YES	8/14/2018

Appendix B Revision History

Revised On	Version	Description
06-Jan-2021	00	<ul style="list-style-type: none"> Updated Attachment A statute information as needed.
29-Apr-2024	01	<ul style="list-style-type: none"> Updated to include Georgia Medicaid FCA.

Appendix C

Centria's Service Documentation "Red Rules"

- To meet payor requirements, service documentation must reflect the provision of active treatment. All service notes should include a written narrative of your observations of the client and the client's progress in treatment.
- Service notes must include the provider's signature, title and date of service. As part of Centria's Service Verification Process (SVP), the service note must also have the signature of an Authorized Signer. This is typically the parent/guardian for home-based services, but additional options are available in CareConnect for clinic-based services.
- Service documentation should reflect the exact start and stop time that services are provided to the client. Staff should not make time adjustments to round their time up/down or simply default to the scheduled start/end times for the session.
- Time worked that is not directly providing services should be documented as non-billable time in CareConnect in accordance with policy. This includes any travel time or service breaks that last more than 7 minutes.
- If you submit service documentation that did not reflect the correct time, date, or services you provided to your client, please take immediate action by notifying your supervisor. Your supervisor will provide guidance on next steps for correcting the issue.
- If the service has already been billed to a payor source, the issue must also be reported to the Corporate Compliance Department for review (CorporateCompliance@CentriaHealthcare.com).

Appendix D

Affirmation of Centria's Compliance Program*

By signing below, I hereby acknowledge that I have received Centria's Compliance Program Manual, which includes direct access to the Centria's Code of Conduct and the Compliance Department's policies and procedures. I understand that I am responsible for reviewing this information and complying with all requirements of Centria's Compliance Program.

I further acknowledge that I have been given the opportunity to ask questions about the Compliance Program, and I have a responsibility to seek guidance if any further questions arise. I am aware that I may contact Centria's Compliance Department if I would like additional information or copies furnished to me.

Signature

Printed Name

Date

*A copy of this affirmation will be retained in signer's employment record.