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Owner Samuel Shea:
GOBHI
Operations and
Compliance
Senior Manager
Area GOBHI
Compliance
Applicability Greater Oregon
Behavioral
Health, Inc.
References Behavioral
Health,
Compliance

GOBHI Code of Conduct Policy

I. Policy Statement and Purpose

- A. GOBHI has developed standards of conduct that describe the principles, values and rules of behavior that are expected by all members of its workforce, and that support its commitment to the development of a culture of ethics and compliance. Those standards evidence GOBHI's commitment to fraud, waste and abuse prevention and enforcement in accordance with the terms of the Oregon Health Authority Coordinated Care Organization (CCO) contract and all other applicable state and federal laws.
- B. The GOBHI Code of Conduct applies to all members of the workforce and the members of the Board of Directors (BOD).
- C. GOBHI will provide a work environment that supports honesty, integrity, and respect in the treatment of workers related to the below areas:
 - 1. **Ethical Conduct and Compliance:** In the performance of duties, staff members will set an example of ethical behavior, and comply with all laws and regulations that govern our business. Staff must never sacrifice ethical and compliant behavior in the pursuit of business objectives.
 - 2. **Business and Financial Information:** Accuracy, Retention and Disposal of Documents and Records: You are responsible for the integrity and accuracy of any organizational documents or records that you write or modify. Falsifying or altering documents or records is absolutely prohibited. This includes improperly back-dating

documents. You are also expected to become familiar with and comply with policies and procedures that address the retention and disposal of the organization's documents and records.

3. **Financial Reporting and Records:** In order to provide accurate and reliable financial records, all financial transactions shall be recorded and according to generally accepted accounting principles (GAAP) and GOBHI policies and procedures. We have implemented internal controls to provide reasonable assurance that management has authorized a transaction and that it has been properly recorded.
4. **Confidentiality of Business and Member Information:** It is your ethical duty to protect the confidentiality of information about trade secrets, confidential business plans, and proprietary business information. When in doubt about whether or not you may share such information, contact the CEO or Corporate Compliance Officer. You are also expected to comply with policies and procedures regarding the confidentiality of member health information. Identifiable member information shall not be shared with others who do not have a legitimate need to know in order to perform their specific job or to carry on business. The use of member, worker or any individual's or entity's information for personal benefit is absolutely prohibited.
5. **Treatment of others:** GOBHI prohibits all forms of discrimination, including harassment of any kind. Members of the staff shall be treated with dignity and respect, regardless of their age, gender, gender identity, race, ethnicity, national origin, religion, sexual orientation, disability, socioeconomic status, or any other basis protected by applicable law.
6. **Conflict of Interest:** A conflict of interest occurs when personal interests could interfere with your ability to make a fair and objective decision on behalf of GOBHI, or create opportunities for fraud or self-enrichment. You should avoid relationships and activities that create, or even appear to create, a conflict of interest. At times, an employee may be faced with situations in which business actions taken on behalf of Company may conflict with the employee's own personal interests. Company property, information or business opportunities may not be used for personal gain. If you are unsure whether a conflict of interest exists, you should talk with the person to whom you report or the Chief Compliance Officer.
7. **Gifts and Gratuities:** GOBHI staff will not accept items from vendors in excess of \$50.00 (fifty dollars) per year, per individual. For perishable or consumable gifts, the aggregate value of the gift may not exceed \$1,000.00 (one thousand dollars). Regardless of value, no more than two perishable or consumable gifts may be accepted per vendor per year. For gifts that are not perishable or consumable, the aggregate value of the gift may not exceed \$250.00 (two-hundred and fifty dollars). All gifts, gratuities, or other compensation from a vendor must be disclosed to the employee's supervisor or manager, or to the CEO for members of GOBHI's board of directors.
8. **Personal Use of GOBHI Resources:** Anything beyond incidental personal use of GOBHI materials, supplies or equipment is prohibited without prior approval from your team leader. You must not remove property from a facility owned or managed by GOBHI without proper authorization. If removed, property must be returned to the facility as soon as practicable, after it is no longer needed for authorized purposes.

411.690(2))

D. Fraud, Waste and Abuse:

1. GOBHI policy is to ensure all employees, contractors and volunteers are provided training related to Fraud, Waste, and Abuse. This includes the federal and state false claims acts, remedies available under these acts and how employees and others can use them, and about whistleblower protections available to anyone who claims a violation of the federal false claims acts. We will also advise our employees, contractors, and agents of the steps GOBHI has put in place to detect health care fraud and abuse. The **Federal False Claims Act** is a federal law that imposes liability on persons and companies who defraud governmental programs. It is the federal government's primary litigation tool in combating fraud against the government. The law includes a qui tam provision that allows people who are not affiliated with the government, called "relators" under the law, to file actions on behalf of the government (informally called "whistleblowing").
 - a. Persons filing under the Act stand to receive a portion of any recovered damages. This statute allows a civil action to be brought against a health care provider who:
 - i. Knowingly presents, or causes to be presented, a false or fraudulent claim for payment or approval to any federal employee;
 - ii. Knowingly makes, uses or causes to be made or used a false record or statement to get a false or fraudulent claim paid; or
 - iii. Conspires to defraud the government by getting a false or fraudulent claim allowed or paid (31 USC SEC 3729(a)).
 - b. **Examples of a False Claim:** Billing for procedures not performed; Up-coding health care services; Falsifying information in the medical record
 - i. **Remedies:** A federal false claims action may be: brought by the U.S. Department of Justice, or brought by an individual as a *qui tam* action(this means the individual files an action on behalf of the government); punishable by a civil penalty of between \$10,781 and \$21,563 per false claim, plus three times the amount of damages incurred by the government; and subject to a statute of limitations that controls how much time may pass before an action may no longer be brought for violation of the law. Under the False Claims Act, the statute of limitations is six (6) years after the date of violation or three (3) years after the date when material facts are known or should have been known by the government, but no later than ten (10) years after the date on which the violation was committed.
 - c. **Federal Whistleblower Protections:** Federal Law prohibits an employer from discriminating against an employee who initiated or otherwise assisted in a false claims action. The employee is entitled to all relief necessary to make the employee whole. 31 USC 3730(h)

- d. **Oregon Whistleblower Statutes:** Criminal and civil laws that prohibit Medicaid fraud are outlined below. It is a crime if a health care provider knowingly submits, or causes to be submitted, a claim for payment to which the provider is not entitled. ORS 180.755; ORS 411.675; ORS 165.690.692. A healthcare provider is subject to civil damages if it has been previously warned against certain billing practices. ORS 411.690(2))
 - e. **Oregon Whistleblower Protections:** Oregon law contains several provisions that prohibit retaliatory action by a healthcare provider against an employee who, in good faith, brings evidence of unlawful practices to the attention of the proper authority. ORS 441.181, ORS 441.057, ORS 659A.233, ORS 659A.203. Further, an employee who believes he or she is the victim of retaliation may file a complaint with the Oregon Bureau of Labor and Industries.
 - f. **Medicaid Waste and Abuse:** In addition to an intolerance of Medicaid fraud, GOBHI prohibits Medicaid waste and abuse, defined as follows:
 - i. **Waste:** The extravagant, careless, or unnecessary utilization of, or payment for, health care services.
 - ii. **Abuse:** An activity or practice undertaken by a member, practitioner, employee, or contractor that is inconsistent with sound fiscal, business or health care practices and results in unnecessary cost to GOBHI, reimbursement for services that are not medically necessary, or an activity or practice that fails to meet professionally recognized standards for health care.
 - iii. **Additional Information:** If you have any questions about this information, you may contact the Corporate Compliance Officer or make an anonymous report to the Hotline at (844) 773-7237.
 - iv. **Obeying All Laws:** Members of GOBHI's workforce are required to follow all applicable federal, state and local laws. Any member of the GOBHI workforce who believes himself or herself to have received instructions otherwise must immediately inform the Chief Compliance Officer or members of the GOBHI Board of Directors.
- E. At GOBHI, we acknowledge and address the historical and ongoing injustices and discrimination faced by individuals based on age, color, disability, gender, gender identity, language, national origin, race, religion, and sexual orientation. We firmly believe that the diverse cultures, ethnicities, backgrounds, and experiences of our staff and the individuals we serve are invaluable assets in shaping and improving our policies and procedures for the advancement of diversity, equity, and inclusion (DEI) practices in our daily work.

II. Definitions

A. NA

III. Procedure

- A. All new members of the GOBHI workforce have access to GOBHI Code of Conduct Policy and an opportunity to ask any questions about its content.
- B. Each workforce member will review the code:
 - 1. Upon employment during new employee orientation with signed attestation
 - 2. Annually, through assignment of policy review in Relias with completion tracked in Relias training records.
- C. **Reporting Obligation and Resources**
 - 1. **Personal Obligation to Report:**
 - a. You are responsible to report any activity that appears to violate applicable laws, rules, regulations, or the Code of Conduct. If you report a concern, but believe that it has not been resolved, contact the Chief Compliance Officer.
 - 2. **Resources for Guidance:**
 - a. We encourage you to discuss concerns with your manager or CEO. If you are uncomfortable doing so, you can discuss the situation with the Corporate Compliance Officer.
 - b. You may contact him/her directly by phone at 541-256-4524, by email at compliance@gobhi.org.
 - c. GOBHI absolutely prohibits, and will not tolerate, retaliatory discipline against a worker who reports concerns using the channels described above. Claims of retaliation will be investigated and, if substantiated, appropriate action will be taken.
 - d. GOBHI takes health care fraud and abuse very seriously. It is our policy to provide information to all employees, contractors and agents about the federal and state false claims acts, remedies available under these acts and how employees and others can use them, and about whistleblower protections available to anyone who claims a violation of the federal false claims acts.
 - e. We will also advise our employees, contractors, and agents of the steps GOBHI have put in place to detect health care fraud and abuse.
 - f. An employee, contractor, temporary worker, or volunteer who provides care or has access to clients, client information, or client funds within or on behalf of any entity or agency licensed, certified, registered, or otherwise regulated by the Department or Authority is subject to a standard criminal history check at hire and monthly sanction check.
 - 3. **Procedure for Reporting:**
 - a. If you think that GOBHI may have made a false claim as discussed above, you are encouraged to: Report it to the Chief Compliance Officer at 541-256-4524, through 1-844-773-7237, or the website at

www.gobhi.ethicspoint.com for further investigation.

- b. You may also report it directly to the federal Department of Justice; you are not required to report a possible false claims act violation to GOBHI first.
4. Report any retaliation you may experience from GOBHI if you inform GOBHI or the federal government of a possible false claims act violation to the Federal Department of Justice.
5. **GOBHI Policies and Procedures for Detecting Fraud and Abuse:**
 - a. See GOBHI Fraud Waste and Abuse Policy.
 - b. See GOBHI Compliance Program and Oversight Policy
6. **Training Policy:**
 - a. GOBHI will train all members of our workforce, contractors, volunteers, and agents regarding federal and state false claims acts, Fraud, Waste, and Abuse, Ethics, and ways to report conduct concerns at hire, and annually.

D. Effectiveness Criteria

1. A review of a sample of employee records reflects compliance with this policy based on need.
2. Violations of the code of conduct are addressed consistently and objectively.

IV. Related Policies & Procedures, Forms and References

- A. GOBHI Reporting Fraud Waste and Abuse Policy
- B. GOBHI Non-Retaliation Policy
- C. GOBHI Compliance Program and Oversight Policy

V. Affected Departments:

- A. All GOBHI employees and GOBHI BOD members

Approval Signatures

Step Description	Approver	Date
Policy Owner	Samuel Shea: GOBHI Operations and Compliance Senior Manager	2/17/2026

Applicability

GOBHI

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