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OUR COMMITMENT AND VALUES

We are guided by integrity, respect, accountability, and compassion. This Code of Conduct reflects our dedication to integrity, quality, and ethical service delivery. It establishes the standards that guide our behavior and decision-making as we work to fulfill our mission of providing high-quality, recovery-oriented, person-centered behavioral health services.

This Code of Conduct is implemented and enforced through the Code of Conduct Policy and related organizational policies.

CORE PRINCIPLES

1. COMMITMENT TO MISSION

We are dedicated to improving the lives of individuals with mental illness, serious emotional disturbance, intellectual and developmental disabilities, and co-occurring substance use disorders. Every action we take supports this mission through recovery-oriented, person-centered care.

2. LEGAL AND REGULATORY COMPLIANCE

We comply with all applicable federal and state laws, Medicare and Medicaid requirements, HIPAA Privacy and Security Rules, the Michigan Mental Health Code, MDHHS contract requirements, professional licensing standards, accreditation standards, and organizational policies.

3. ETHICAL CONDUCT

We conduct ourselves with honesty, integrity, and professionalism in all interactions—with individuals served, families, colleagues, partners, funders, and the public.

4. QUALITY OF CARE

We provide services that meet or exceed professional standards, are evidence-based and clinically appropriate. We provide services that are: delivered by qualified and competent staff; support recovery, resiliency, and wellness; and respect individual choice and dignity.

5. STEWARDSHIP OF RESOURCES

We use organizational resources responsibly and for their intended purposes. We are accountable for the efficient and effective use of public and private funds entrusted to us.

STANDARDS OF CONDUCT

1. RESPECT FOR INDIVIDUALS SERVED

WE WILL:

- Treat all individuals with dignity, respect, and compassion
- Honor individual rights, including informed consent, confidentiality, and participation in treatment planning
- Provide culturally responsive, trauma-informed services
- Respect individual preferences, values, and choices
- Protect individuals from abuse, neglect, and exploitation
- Maintain appropriate professional boundaries

WE WILL NOT:

- Discriminate based on race, ethnicity, national origin, religion, gender, gender identity, sexual orientation, age, disability, or other protected characteristics
- Engage in physical, verbal, emotional, or sexual abuse
- Enter into personal or romantic relationships with individuals served
- Accept gifts of significant value from individuals served
- Exploit individuals for personal gain

2. CONFIDENTIALITY AND PRIVACY

WE WILL:

- Protect the confidentiality of all protected health information (PHI)
- Access medical records only when necessary for job duties
- Obtain proper authorization before disclosing PHI
- Discuss client information only in private settings
- Secure documents and electronic devices containing PHI
- Report breaches or potential breaches immediately

WE WILL NOT:

- Discuss client information in public areas or with unauthorized persons
- Access records of friends, family, or others without job-related need
- Remove or copy PHI without authorization
- Share login credentials or allow unauthorized access to systems
- Post client information on social media

3. ACCURATE DOCUMENTATION AND BILLING

WE WILL:

- Document direct and indirect services completely, accurately, and timely
- Bill only for services actually provided by qualified staff
- Use correct billing codes that accurately reflect services provided
- Maintain documentation supporting all billed services
- Correct errors promptly when identified
- Return overpayments within 60 days

WE WILL NOT:

- Bill for services that have not been provided
- Falsify clinical documentation or alter records to support billing
- "Upcode" (bill for a more expensive service than required or provided), duplicate bill, or unbundle inappropriately

4. PROFESSIONAL COMPETENCE

WE WILL:

- Maintain current licenses, certifications, and credentials
- Participate in required training and professional development
- Practice within our scope of competence and licensure
- Seek consultation or supervision when needed
- Immediately report impairment that affects ability to perform duties safely

WE WILL NOT:

- Falsify credentials, education, or experience
- Provide services while impaired

5. CONFLICTS OF INTEREST

WE WILL:

- Disclose any actual or potential conflicts of interest
- Avoid situations where personal interests conflict with organizational or client interests
- Recuse ourselves from decisions where we have conflicts

WE WILL NOT:

- Use our position for personal gain
- Engage in self-dealing or self-referral (using one's position to direct NLCMHA resources, services, clients, or contracts to oneself, a family member, or a business in which the individual has a financial or personal interest)
- Accept kickbacks or bribes
- Use confidential information for personal benefit

6. WORKPLACE CONDUCT

WE WILL:

- Treat colleagues with respect and professionalism
- Cooperate and collaborate with team members and other departments
- Communicate honestly and respectfully
- Follow organizational policies and procedures
- Use organizational resources appropriately

WE WILL NOT:

- Engage in harassment, bullying, or discrimination
- Use abusive, threatening, or demeaning language
- Engage in workplace violence
- Use alcohol or illegal drugs at work or report to work under the influence
- Misuse organizational property or resources

7. FINANCIAL INTEGRITY

WE WILL:

- Handle organizational funds responsibly
- Follow purchasing and procurement policies

- Submit accurate expense reports
- Report suspected fraud, waste, or abuse

WE WILL NOT:

- Embezzle, steal, or misuse organizational funds
- Falsify expense reports or financial documents
- Accept unauthorized payments or kickbacks

8. REPORTING OBLIGATIONS

WE WILL:

- Report promptly (and immediately when required to protect safety or comply with law) suspected compliance violations, fraud, waste, or abuse
- Report promptly (and immediately when required to protect safety or comply with law) safety concerns and risks to individuals served
- Report one's own errors, compliance concerns, or potential violations promptly (and immediately when required to protect safety or comply with law) and honestly
- Cooperate with compliance investigations
- Report promptly (and immediately when required to protect safety or comply with law) to appropriate authorities as required by law (child abuse, elder abuse, harm to self/others)
- Speak up when we observe conduct inconsistent with this Code

WE WILL NOT:

- Ignore violations or unethical conduct
- Retaliate against those who report in good faith
- Interfere with investigations

QUESTIONS AND GUIDANCE

When you have questions about this Code or need guidance on ethical issues, please contact:

- Your direct supervisor
- Compliance Officer
- Human Resources
- Executive leadership

We encourage asking questions before acting when uncertain about the right course of action.

ACKNOWLEDGMENT

All workforce members must review, understand, and acknowledge this Code of Conduct. By signing the annual certification, you confirm your commitment to upholding these standards in all aspects of your work.

This Code of Conduct was reviewed and accepted by the NLCMHA Leadership Team on 3/23/2026.