

New View Alliance, Inc. (“NVA”) Code of Conduct

The NVA Code of Conduct is a part of the NVA Corporate Compliance Plan, a set of formal organizational systems which are intended to prevent, detect and correct payment and billing mistakes, fraud, waste and abuse in compliance with Federal and State laws/regulations including, but not limited to, the following:

New York State Social Service Law Section 363-D
New York Codes, Rules and Regulations, Title 18 Part 521
New York State Finance Law Article 13 §§ 187-194 (“NY False Claims Act”)
31 United States Code §§ 3729 through 3733 (“Federal False Claims Act”)
New York Not-For-Profit Corporation Law

NVA demonstrates its commitment to the display of honest, ethical behavior in all interactions according to its Code of Conduct and NVA policies.

Activities Applicable Under this Code of Conduct

All directors, officers, key persons, employees, contractors and volunteers/interns of NVA shall display honest, ethical conduct while carrying out their role to fulfill the activities outlined below:

1. Billing
2. Payment
3. Medical necessity and quality of care
4. Governance
5. Mandatory reporting,
6. Credentialing
7. Other risk areas that are, or should, with due diligence be identified (for example, a breach of confidentiality).

For purposes of this policy, a key person shall have the meaning provided in New York Not-For-Profit Corporation Law Section 102(a) (25), which is the following:

Any person, other than a director or officer, whether or not an employee of New View Alliance, Inc. who (i) has responsibilities, or exercises powers or influence over New View Alliance, Inc. as a whole similar to the responsibilities, powers, or influence of directors and officers; (ii) manages New View Alliance, Inc., or a segment of New View Alliance, Inc. that represents a substantial portion of the activities, assets, income or expenses of New View Alliance, Inc.; or (iii) alone or with others controls or determines a substantial portion of New View Alliance, Inc.’s capital expenditures or operating budget.

Duty to Report

All directors, officers, key persons, employees, contractors and volunteers/interns of NVA must report any known or possible violation of this Code of Conduct, NVA Code of Ethics, NVA policies or federal, state, local laws/regulations in accordance with the reporting methods outlined in this Code of Conduct.

Any conduct that a reasonable person would in good faith believe to be erroneous, wasteful or fraudulent must be reported in accordance with the reporting methods outlined in this Code of Conduct.

Examples of potential reportable compliance concerns may include:

- **Documentation** claiming entitlement to payment for services rendered that is submitted in error or fraudulently; as may be found in a progress note, client attendance record, or billing code.
- **Employee entitlement to payment that is claimed in error or fraudulently** as in a time sheet, invoice, reimbursement request, or a check request.

Those who fail to report any known or possible violation of this Code of Conduct, NVA Code of Ethics, NVA policies or federal, state, local laws or regulations, participate in non-compliant behavior, and/or encourage, direct, facilitate or permit non-compliant behavior will be subject to the responses outlined below for misconduct as a result of an investigation.

Non-Intimidation and Non-Retaliation

Consistent with NVA's Non-Intimidation and Non-Retaliation Policy, no director, officer, key person, employee, contractor, or volunteer/intern of NVA who in good faith reports any action or suspected action taken by or within NVA that is illegal, fraudulent, or in violation of law (e.g. including, but not limited to the New York False Claims Act) or of any adopted policy of NVA shall suffer intimidation, harassment, discrimination or other retaliation or, in the case of employees, an adverse employment consequence. However, reports made in bad faith by employees may result in disciplinary action up to and including termination.

Investigation

Reports of any known or possible violation of this Code of Conduct, NVA Code of Ethics, NVA policies or federal, state, local laws or regulations will be investigated by the Compliance Officer according to the NVA Investigation and Resolution of Compliance Concerns Policy.

Communications connected to the report will be kept confidential to the degree possible while conducting the investigation.

All directors, officers, key persons, employees, contractors and volunteers/interns of NVA are expected to cooperate fully in an investigation of a report of a known or possible violation of this Code of Conduct, NVA Code of Ethics, NVA policies or federal, state, local laws or regulations.

Misconduct or violation of this Code of Conduct, NVA Code of Ethics, NVA policies or federal, state, local laws or regulations will result in employee disciplinary action up to and including termination or, for other individuals, action according to the applicable handbook, agreement or NVA By-Laws.

Reporting Methods

Reports of any known or possible violation of this Code of Conduct, NVA Code of Ethics, NVA policies or federal, state, local laws or regulations must be made to the Corporate Compliance Officer through normal supervisory channels or as follows:

- Corporate Compliance Officer, Pamela Rouse (716-783-3224; prouse@newviewalliance.org)
- Board of Directors Audit and Compliance Committee Chair, Tracy Meyer; 716-400-4529.
- The Whistleblower Hotline

Please note that reports made using the Whistleblower Hotline may be made anonymously

- By Phone: 877-472-2110
- E-mail: reports@lighthouse-services.com
- Fax (215) 689-3885
- By letter to: Lighthouse Services, Inc. 1710 Walton Road, Suite 204, Blue Bell, PA 19422
(You must include New View Alliance, Inc.'s name in the letter)