



Standards of Conduct

Board Approved 05/27/2025



Purpose:

Clarity is committed to compliance with all applicable Federal and State laws and the prevention of unethical, improper, or unlawful behavior or acts in the delivery and billing of services, and prevention and detection of fraud, waste, and abuse. The Standards of Conduct are approved by Clarity's Board of Directors. This document is a formal statement of Clarity's commitment to the standards and rules of ethical conduct and is intended to provide guidelines for conducting business in a manner that fulfills this commitment and supplements our mission, vision, and values.

Who must abide by the Code of Conduct?

Clarity's Standards of Conduct (the Standards) apply to all Affected Individuals. The term "Affected Individuals" includes all employees, senior leadership members, the Executive Director, contracted practitioners, students, members of the board of directors, and contractors and vendors acting within Clarity's compliance program risk areas. All Affected Individuals, as defined above, must comply with the Standards of Conduct, immediately report any alleged violations of wrongdoing, and assist Management and the Compliance Officer in investigating allegations of wrongdoing.

While the standards addressed in this document are intended to guide Affected Individuals in their daily responsibilities, they do not replace any Clarity policies and procedures. There may be instances not addressed by the Standards of Conduct or existing policies and procedures, or there may be activities that seem to conflict with the Standards. Affected Individuals must seek direction from their supervisor, other Management staff, or the Compliance Officer in these instances.

The Clarity Mission

- Empower people with care, connections, and support for a lifetime of choice.

The Clarity Vision

- A supportive community where all people lead the lives they choose.

Clarity's Core Values

- Put People First
- Be Compassionate
- Instill Hope
- Be Approachable and Accessible
- Uphold Integrity
- Preserve Dignity
- Adapt and Adjust
- Live for the Next Step Forward

1. Ethics

It is the policy of Clarity to comply with all laws and regulations applicable to its business and to conduct business with the highest degree of integrity. To accomplish this, all Affected Individuals must obey the laws and regulations that govern their work and always act in the best interest of those who receive services and their families, (collectively referred to as service recipients), and Clarity.

Guidelines for Affected Individuals:

- a. You are expected to keep Management staff informed of what you are doing, to document or record all services or transactions accurately, and to be honest and forthcoming with Clarity, regulatory agencies, and internal and external auditors.
- b. You are expected to comply with Clarity's policies and procedures, accounting rules, and internal controls.
- c. You are expected to function with honesty in your work for Clarity and with service recipients, other providers, suppliers, and all others with whom Clarity does business.

2. Conflict of Interest:

For purposes of this section on conflict of interest, an immediate family member is any person who is related by blood or marriage, or whose relationship with the Affected Individual is similar to that of persons who are related by blood or marriage. An immediate family member of a person includes:

- ❖ The person's spouse
- ❖ Natural or adoptive parent, child, or sibling
- ❖ Stepparent, stepchild, stepbrother, or stepsister
- ❖ Father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law.
- ❖ Grandparent or grandchild
- ❖ Spouse of a grandparent or grandchild

Affected Individuals may not engage in any conduct that conflicts - or is perceived to conflict - with the best interest of Clarity. The appearance of a conflict of interest may be as serious as an actual conflict of interest. You must not allow any outside financial interest or competing personal interest of yours or your immediate family to influence your decisions or actions taken on behalf of Clarity. This means that you should not take actions or make decisions where you or your immediate family

personally benefit from doing business with Clarity or have independent relationships with those who deal with Clarity, should not use Clarity property for personal benefit, and should avoid direct competition with Clarity.

Affected Individuals must disclose any circumstances where they or their immediate family member are an employee, consultant, owner, contractor, or investor in any entity that (i) engages in any business or maintains any relationship with Clarity, (ii) provides to, or receives from, Clarity any referrals of service recipients, or (iii) competes with Clarity.

If you have a potential conflict, you must make full disclosure to the Compliance Officer, members of Management and the Board, as appropriate. You will be provided with actions that may be necessary to address or prevent conflict of interest.

Guidelines for Affected Individuals: Conflict of Interest:

It is a conflict of interest for you to personally take for yourself opportunities that are discovered through the use of Clarity's property, information, or your position with Clarity, to use Clarity's property or information for personal gain, or to compete with Clarity.

There are many types of situations where potential conflicts may arise. You must promptly report any actual or potential conflict of interest to your immediate supervisor or directly to the Compliance Officer.



Outside Activities and Employment

- a. You may not conduct outside activities during work time. Such activities interfere with your regular duties and negatively impact the quality of your work.
- b. You are a representative of Clarity in your everyday life and must represent Clarity positively in the community.
- c. Staff of Clarity must ensure that outside employment and outside activities do not interfere with job responsibilities or jeopardize public confidence in the agency. If unsure, staff is encouraged to discuss any significant employment or outside activities with their supervisor or Compliance Officer

Use of Clarity Funds and Resources

- a. Clarity's assets are to only be used for the benefit of Clarity and its service recipients. Assets include not only funds, equipment, inventory, and office supplies, but also concepts, business plans and strategies, information about service recipients, financial information, computer property rights, and other business information about Clarity.
- b. You may not use Clarity assets for personal gain or give them to any other persons or entities, except in the ordinary course of business as part of an approved transaction.

3. Professional Conduct

The following boundaries are required Standards of Conduct for Clarity Affected Individuals:

Welfare of the Service Recipient

Clarity Affected Individuals respect the integrity and protect the welfare of the prospective service recipients applying for or enrolled in Clarity programs. They are responsible for fully informing participants about the purpose and nature of an evaluative, treatment, educational or training procedure and that service recipients have the freedom to choose whether or not to participate.

Competence

Employees, contractors, interns, students and prospective employees and volunteers must honestly detail the extent and nature of their training and experience when applying for Clarity positions. Affected Individuals should only provide services which are within their scope of practice and level of competence and under supervision, which is commensurate with their training,

experience and identified needs. They must also recognize and accept the need for continuing education and participate with supervisory personnel in formulating staff development plans. Clinical staff must maintain knowledge of current scientific and professional information related to the services they render. All Affected Individuals are responsible for maintaining knowledge of state and federal regulations that pertain to the delivery and clinical documentation of services.

Clinicians recognize that personal problems and conflicts may interfere with professional competence. Accordingly, they refrain from any activity in which their personal problems are likely to lead to inadequate performance or harm to a service recipient. If engaged in such activities when they become aware of their personal problems, they seek competent professional assistance to determine whether they should suspend, terminate, or limit the scope of their professional activities.

Professional Relationships

Professional and paraprofessionals, and all Affected Individuals of Clarity act with due regard for the needs, competencies and obligations of their coworkers and colleagues in other agencies and professions. They respect the prerogatives and obligations of the institutions or organizations in which these colleagues are associated. All employees must act to secure for their service recipients the best possible professional services and to exercise foresight, diligence, and tact in obtaining the complimentary or alternative assistance needed by service recipients through other agencies and providers.



Personal Relationships

Employees may not exploit their professional relationships with service recipients, supervisees, interns, students, or employees sexually or otherwise. Employees may not engage in sexual relations with an active service recipient of the agency. Employees may not condone nor engage in sexual harassment. Sexual harassment is defined as deliberate or repeated comments, gestures, or physical contact of a sexual nature that are unwanted by the recipient.

Employees must be continually cognizant of their own needs and their potentially influential position with service recipients, interns, students, and subordinates. Exploiting the trust and dependency of service recipients is forbidden. Senior staff members are responsible for ensuring that services are not extended when the service recipient is not benefiting from them.

Code of Ethics

Employees are expected to adhere to their professional code of ethics, such as the National Association of Social Worker code of ethics for licensed and unlicensed social workers. If there is a discrepancy in the professional code of ethics and the Clarity Standards of Conduct, policies or procedures, the employee is to address this concern with the assigned supervisor.

4. Maintenance of Records

Affected Individuals must record and report all information related to Clarity and its operations, its service recipients, and financial information fully, accurately, and honestly. Records include, but are not limited to, records of the service recipients, documentation of services, accounting books or records, financial statements, timesheets or records, expense reports, vouchers, bills, payroll, claims, payment records, correspondence, and any other method of communication. Affected Individuals must not omit or conceal any relevant information.

Guidelines for Employees and Independent Contractors: Recordkeeping

Many of Clarity's forms are legal documents used to prove that a service was provided, to bill for a service, to record a job task, or to record specific happenings. You must document accurately and honestly, and only for those services that you provided or those events in which you were involved.

Affected Individuals are expected to maintain complete, accurate, and contemporaneous (timely), records as required by Clarity. The term "records" includes all documents, both written and electronic, that relate to the provision of Clarity services or provide support for the billing of Clarity services. Records must reflect the actual service provided.

Falsification of Records

- a. You must not make any false entries in any of Clarity's records or in any public record for any reason.
- b. You may not alter any permanent entries in Clarity's records. Any records to be appropriately altered must reflect the date of the alteration, the name, signature, and title of the person altering the document, and the reason for the alteration, if not apparent.
- c. You may not sign the name of another person to any document.
- d. You may not create or participate in the creation of any records that are intended to mislead or to conceal anything that is improper.
- e. Backdating and predating documents is unacceptable.

Expense Records

- a. You must always charge expenses accurately and to the appropriate cost center or account, regardless of the financial status of the program, project, contract, or the budget status of a particular account or line item.

Retention of Records

- a. The retention, disposal, or destruction of records of or pertaining to Clarity must always comply with legal and regulatory requirements and Clarity policy.
- b. You may not destroy records pertaining to any legal action or government investigations or audit without written approval of the Compliance Officer.

5. Protection of Confidential Information

During your employment, contract, or association with Clarity, you may acquire confidential information about Clarity, its staff, and service recipients which must be handled in strict confidence and not discussed with outsiders. The protection of confidential business, employee, and

service recipient information is very important. Violations may result in fines and penalties, legal action, or criminal charges.

Clarity has developed policies and procedures to assure that the confidentiality of Clarity's information and information about service recipients is protected and released only with the appropriate authorization or for lawful reasons. All Affected Individuals are required to comply with Clarity's Uses and Disclosures of Protected Health Information. If you have any questions concerning confidential information or the Uses and Disclosures of Protected Health Information Policy, contact your immediate supervisor or the Compliance Officer.

Guidelines for Affected Individuals: Confidentiality

- a. You must treat all of Clarity's records and information as confidential.
- b. You may not release confidential information without the proper authorization. Confidential information includes not only information about service recipients and their families, but also non-public information about Clarity that may be of use to Clarity's competitors or harmful to Clarity or its service recipients if released.
- c. You must protect Clarity's information and avoid discussing or disclosing Clarity's information, purposefully or inadvertently, (through casual conversation), to any unauthorized person inside or outside Clarity. Furthermore, staff may not share confidential information about Clarity with anyone, except where required for a legitimate business purpose. Ask your supervisor if you are not sure whether certain information is confidential.
- d. Clarity's information may not be removed from Clarity's property without permission from a supervisor or administrator with proper authority over the information.
- e. All subpoenas, court orders, and other inquiries and requests from attorneys, and courts must be immediately reported to the Compliance Officer before action is taken. Any subpoena or court order that identifies Clarity as a defendant or the subject of a legal matter must immediately be reported to the Executive Director or designee in the absence of the Executive Director.



Termination of Employment or Contract

- a. You may not use any confidential information gained from your employment or contract with Clarity for your benefit or another competitor's benefit. You may not take copies of any reports, documents, or any other property belonging to Clarity.
- b. Upon termination of employment or contract with Clarity, you must return all of Clarity's property including, but not limited to, copies of documents, notes, and other records containing confidential information, computer disks and flash drives, laptops and other computers, cell phones, your ID, business cards, keys, access swipe cards, and credit cards.

6. Information Security

Guidelines for Affected Individuals: Information Security and Technology

- a. You are responsible for properly using information stored and produced by all of Clarity's computer systems.
- b. Computers, internet access, email, or other office communication systems are intended for business-related purposes only and not for uses that may be disruptive, offensive, harassing, or harmful to others.
- c. Do not share your system username or password with another person or allow another to access the computer with your password or log-on information.

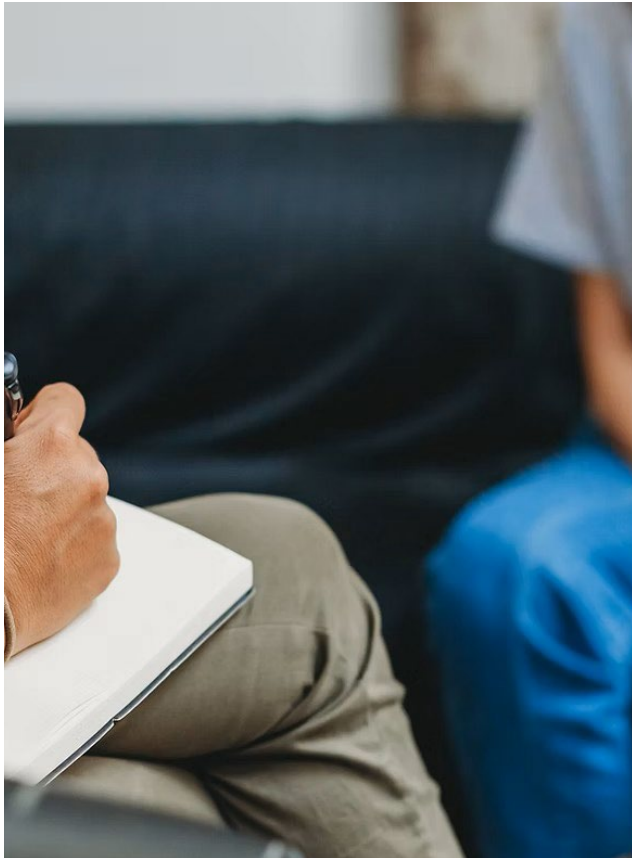
- d. All Affected Individuals are required to comply with Clarity's Information System General Usage Policy. If you have any questions concerning information security, contact your immediate supervisor, the Information Technology Director/ HIPAA Security Officer, or Compliance Officer.

7. Fair Dealing

Business Dealings and Referrals

Clarity will not be inappropriately influenced with goods or services from any business in which Affected Individuals and their immediate family members have a substantial interest.

Conducting business with providers, contractors, suppliers, service recipients, and competitors may pose ethical, and sometimes legal, problems. Affected Individuals are expected to deal fairly with providers, contractors, service recipients and competitors.



Guidelines for Affected Individuals: Fair Dealing

The Standards of Conduct and the following guidelines are intended to help you make appropriate, responsible, and correct decisions in these and all matters:

Kickbacks and Rebate

- a. Kickbacks and rebates in cash, credit, or other forms are prohibited. They are not only unethical, but also in many cases illegal.

Gifts and Gratuities and Entertainment-

- a. Affected Individuals may not without permission of the Compliance Officer and the Executive Director accept, solicit, or offer anything of value from anyone doing business with the Clarity.
- b. Under no circumstances may an employee or immediate family member of an employee accept a cash or cash-equivalent gift or gratuity from a service recipient, a family member or friend of a service recipient, or a vendor or potential vendor because of the services provided by Clarity or with the intent to affect the services provided by Clarity. Any Affected Individual who gives or accepts such a cash gift or gratuity will be subject to disciplinary action, including termination of contract, assignment, or engagement with Clarity.
- c. You may not solicit money, gifts, gratuity, or any other personal benefits or favors of any kind from providers, contractors, accounts, or service recipients and their families.
- d. You must not offer or accept entertainment that is not a reasonable addition to a business relationship but is primarily intended to gain favor or to influence a business decision.
- e. Gifts of nominal value, defined as no more than \$15 per item or \$75 in the aggregate per patient on an annual basis, may be accepted, but must be reported to the employee's supervisor, program director, or the Compliance officer. This does not include cash or cash-equivalent gifts that are strictly prohibited.
- f. Clarity prohibits staff from soliciting sales of any kind to people receiving services. This includes but is not limited to solicitation of entertainment, catalog sales, or home parties, (candles, kitchen wares, home

decorating, etc). Passive solicitations between employees that do not cause work interruptions are permissible. Avoid the perception that participating with solicitations has any bearing on assessment of performance or acceptance by peers. Agency staff will not be subjected to outside solicitations.

Agreements with Contractors and Vendors

- a. Clarity must ensure that any agreements with contractors and vendors clearly and accurately describe the services to be performed or items to be purchased. Performance standards and the applicable compensation, if any, must be reasonable in amount, not be excessive in terms of industry practice, and must equal the value of the service(s) rendered or items purchased.

Improper Use of Funds or Assets

- a. Use of Clarity's funds or assets for any improper purpose is strictly prohibited. If you are aware of or have reason to believe that funds or assets are being improperly used, you must report this immediately to your supervisor or the Compliance Officer.
- b. You may only approve payments or receipts on behalf of Clarity that are described in documents supporting the transaction. "Slush funds" or similar off-book accounts, where there is no accounting for receipts or expenditures on the Clarity's books, are strictly prohibited.

8. Federal and State Programs

Clarity is committed to complying with the laws and regulations that govern the Federal and State programs that it administers. The Compliance Program, these Standards of Conduct, and policies and procedures are developed to provide guidance in your day-to-day work and activities you perform on behalf of Clarity. You must abide by the policies and procedures and the Standards set by Clarity.

Clarity's programs and services are largely funded by Federal and State healthcare programs, including Medicaid and Medicare. Clarity is committed to full compliance with all Federal and State healthcare program requirements. Clarity must also comply with laws and regulations designed to combat fraud, waste, and abuse, and the submission of inaccurate or false claims.

Clarity has put in place procedures and practices to ensure that:

- a. All service documentation, records, and reports are prepared timely, accurately, and honestly.
- b. All documentation supporting claims for service is complete and maintained in accordance with regulatory requirements and Clarity's policies.
- c. All claims submitted to any government or private healthcare program are accurate and comply with all Federal and State laws and regulations and payer requirements.
- d. Claims are only submitted for medically necessary services provided by eligible providers.
- e. All claims are properly documented and accurately coded.
- f. Billing errors are promptly identified, and any payments received in error are promptly returned to the payer.

Employees and independent contractors responsible for the documentation, charging, coding, billing, and accounting of services must comply with all applicable State and Federal regulations and Clarity policies and procedures.

It is against the law and Clarity's policies to knowingly or carelessly submit a false claim. Submitting a false claim includes using false records, using the wrong code, double billing, or billing, or causing services that are not provided or fully documented to be billed, and billing for services that are not medically necessary.

All Affected Individuals have a responsibility to notify the Compliance Officer promptly if they are charged with a criminal offense related to healthcare or are proposed or found to be subject to exclusion from Federal or State healthcare programs.

9. Governmental Investigations

There may be times that Clarity is asked to cooperate with an investigation by a Federal or State governmental agency, or to respond to a request for information. A request may be formally addressed to Clarity or to an individual employed by or associated with Clarity. All Affected Individuals must report any requests for information or cooperation with an investigation to

the Executive Director and Compliance Officer immediately.

10. Employment Environment

Clarity is committed to creating a safe and professional workplace where employees and others are treated with respect and without regard to their race, sex, age, religion, national origin, color, marital status, disability, or other protected characteristics. Business integrity, teamwork, trust, and respect are Clarity's most important values. Unlawful discrimination or harassment of any sort violates these values. All Affected Individuals must exhibit and promote respect, integrity, trust, and teamwork in the workplace and must comply with Clarity's policies prohibiting discrimination and harassment in all facets of Clarity's work.

All Affected Individuals are required to support Clarity's commitment to a safe and professional work environment and to demonstrate appropriate behavior in the workplace.

All Affected Individuals are prohibited from joking about another person's race, sex, age, religion, national origin, color, marital status, disability, or other protected characteristics.

All employees are prohibited from considering someone's race, color, religion, sex, national origin, age, disability, or other protected characteristic in making decisions about hiring, placement, assignment of duties, training, promotion, termination, compensation, benefits, and other work terms.

Sexual harassment is prohibited. Sexual harassment includes any form of unwelcome sexual advance, request for sexual favors, or other verbal or physical conduct of a sexual or sex-based nature.

Affected Individuals are responsible for understanding Clarity's policy prohibiting discrimination and sexual harassment. You should consult with an appropriate supervisor, administrator, or Human Resources if you have questions about your right to a workplace free from unlawful harassment or discrimination or if you have questions about your duty to avoid discrimination.

11. Seeking Guidance and Reporting Violations

All Affected Individuals must report any suspected fraud, waste, and abuse; illegal or unethical acts; actual or suspected violations of Federal or State laws and regulations; actual or suspected violations of the Standards of Conduct, the Compliance Program and Clarity's policies and procedures; improper acts in the delivery or billing of services; and other wrongdoing (collectively referred to as "compliance concerns") to their immediate supervisor, member of Management, Compliance Committee member or the Compliance Officer. A Compliance Hotline is also available for confidential or anonymous reporting of such issues. The Clarity Compliance Hotline phone number is (800) 928-0084. Reports can also be made online at report.complyline.com. The organization pin is 894447 and the site ID is 1. Both the organization pin and site ID are needed to report via phone or online.

When actual or suspected noncompliance is reported to any Affected Individual, it must be promptly referred to the Compliance Officer. Steps will be taken to protect the confidentiality and anonymity of the reporters. Clarity will not tolerate any form of retaliation or intimidation against a person who makes a good-faith report in



accordance with the Standards of Conduct and its Compliance Program.

All Affected Individuals must cooperate fully and honestly in any investigation into reported noncompliance.

12. Corrective Action and/or Discipline

Affected Individuals found to have engaged in non-compliant activity or wrongdoing addressed in these Standards of Conduct will be subject to appropriate disciplinary action, up to and including termination of employment, contract, assignment, or association with Clarity.

Affected Individuals who knowingly fail to report compliance concerns are subject to appropriate disciplinary action, up to and including termination of employment, contract, assignment, or association with Clarity.

Employees may face disciplinary action ranging from a verbal warning to suspension or termination, depending on the incident and the relevant surrounding circumstances. A more significant level of discipline will be taken for intentional or reckless behavior.

13. Your Responsibilities

- ✓ Attend required training, and read and understand Clarity's Compliance Plan, Compliance Program Policies and Procedures, Employee Handbook, and Standards of Conduct.
- ✓ Follow Clarity's Standards of Conduct and abide by all policies and procedures, guidelines, and Federal and State laws and regulations.

- ✓ Be alert to any situation that could violate Clarity's Standards of Conduct, Compliance Program, policies and procedures, guidelines, and/ or Federal and State laws and regulations.
- ✓ Promptly report any questions, issues, compliance concerns, wrongdoing, violations, or suspected

