



monroe plan
FOR MEDICAL CARE

Code of Conduct

*Setting the standard for corporate
compliance & ethical behavior
in the workplace.*

*Rated among the
nation's top Medicaid
managed care plans*



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Our Vision and Mission

The Monroe Plan for Medical Care is recognized nationally as a health care management organization that improves health outcomes and reduces disparities for low income and working poor individuals and their families. It achieves these accomplishments through its effective partnerships with its 100,000 enrollees and 4,000 health care professionals, its innovative quality management programs, its focused community leadership and its strategic organizational management.

We dedicate our efforts to: facilitating access to high quality health care services; educating patients and caregivers in areas that foster an effective partnership in health care management; supporting our network of caregivers in their efforts to deliver high quality services to their patients; and collaborating with others around issues that affect the health of our enrollees and their families.



Dear Fellow Employees:

Our Board of Directors has adopted a Corporate Compliance Program designed to help each one of us incorporate necessary ethical standards into our day-to-day activities and responsibilities here at work. These ethical standards are known as our Code of Conduct.

The Monroe Plan is committed to the values of honesty, integrity and fairness, and the implementation of this Code is proof of that commitment. The Code educates us about the legal and ethical rules of accepted business practices, raises awareness of questionable conduct, provides ways to report suspected ethics violations, and enables you to make informed, fair business decisions on our behalf.

Kindly take time to review this brochure. It has been developed to provide you with an overview of our Code of Conduct, and to help explain your obligations under it. It also provides you with information about some of the resources we have put in place to make corporate compliance a significant part of our everyday work lives.

Thank you for your attention and adherence to the vital information contained in this *Code of Conduct*.

Dennis J. Graziano
President and Chief Executive Officer

Introduction . . . The values that guide us

At Monroe Plan, we share a commitment to improving health outcomes and reducing disparities for our members, while operating according to the highest standards of fairness and integrity.

At the Monroe Plan, our primary values and beliefs serve as our guideposts, underpinning the way we do business and supporting our efforts to conduct ourselves according to the highest ethical standards each and every day.

Integrity

Integrity means providing quality services consistent with our aim of maintaining a leadership position as one of the highest-rated Medicaid managed care plans in the U.S.

Accountability

By taking personal responsibility for our tasks and results, we hold ourselves accountable for our successes and mistakes. Always striving to be our best, we are committed to helping the organization to meet every challenge.

Focus

The quality and value we deliver in our services must lead our stakeholders to prefer doing business with us.

Reputation

Our reputation makes a big difference in our relationships with our key stakeholders and in the communities where we do business. We desire to maintain, protect and enhance that reputation.

Trust

We keep our word. We do the right thing because it is right. That has been our policy. That will continue to be our policy.

Objectivity

As we strive for superior service, we objectively measure how our stakeholders judge us, because we know this is the only way to meet and surpass their expectations.

Teamwork

We work together and help each other, because at the end of the day, we succeed—or fail— as one team, one organization, one Monroe Plan.

About Our Code of Conduct

The Monroe Plan's Code of Conduct (the Code) reflects our commitment to operating in accordance not only with the strict requirements of the law, but also in a manner that is consistent with high ethical and professional standards.

All employees, directors and contractors have a personal obligation to: familiarize themselves with our Code and compliance procedures; review and understand the key policies governing their particular job functions; report any fraud, abuse or other improper activity through the mechanisms established under the program; cooperate in internal and government audits and investigations; and carry out their jobs in a manner that demonstrates a commitment to honesty, integrity and compliance with the law.

This brochure is designed with specific sections (e.g., Employees, Members) to help guide your decision-making when Compliance issues arise. We cannot answer every specific ethical and legal question and uncertainties are bound to occur. In these situations, or whenever questions arise regarding Compliance or our Code of Conduct, seek direction from your immediate supervisor, the Corporate Compliance Officer or Human Resource Department.

To report possible violations of the Code of Conduct you can call the compliance hotline at 1-800-233-4038. Employees' reports of Code of Conduct violations will be kept confidential to the extent permitted by law and our ability to address specific concerns.

Plan Members

Monroe Plan members utilize our services because they trust us to deliver quality and value in everything we do. We must conduct our business to preserve that trust.

Access to Medically Necessary Services

The Monroe Plan is committed to ensuring that all members receive prompt and appropriate access to the full range of medically necessary health care services in accordance with the standards set forth in government contracts, regulations or applicable law.

Maintaining Confidentiality of Member Records

As a “business associate” of the health plans with which it contracts, the Monroe Plan must comply with the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”), which limits the use and disclosure of protected health information. The Monroe Plan also must comply with special state confidentiality laws governing HIV-related and genetic testing information. The Monroe Plan has adopted a comprehensive privacy compliance program governing the use and disclosure of member records. All employees who have access to such records must familiarize themselves with the program’s policies and procedures, and adhere to their terms.

Honesty in Every Interaction

The Monroe Plan is committed to conducting all of its activities with honesty and integrity. Employees are expected to act in a manner that promotes the Monroe Plan’s reputation as an organization that exceeds the strict requirements of the law and operates with the highest ethical standards.

A worried relative is calling to find out if one of our members is receiving health care for HIV/AIDS. A customer service rep takes the call and turns to you for help. She says the caller is crying and sounds really concerned. Against your advice, she gives out the information. The Code of Conduct is crystal clear that it is wrong to give out protected health information. Your co-worker may have meant well, but that doesn’t make her conduct right. As for you, you may not WANT to get involved and report what you believe to be a violation of the Code of Conduct. But, it’s your duty, as a Monroe Plan employee, to take action.

Plan Providers and Purchasers

Monroe Plan has invested substantial time, effort and resources developing strong relationships with our health care professionals, plan providers and purchasers. Our business practices must preserve those relationships.

Purchasing from Suppliers

Suppliers should be selected on the basis of objective information concerning such factors as quality, safety, value, best or lowest price, technical excellence, service reputation and production capacity. Employees should be certain that personal or family relationships do not influence or appear to influence objective purchasing decisions.

Avoiding Conflicts of Interest

All employees, directors and officers must avoid activities that constitute or create an appearance of a conflict of interest. All are prohibited from using their positions for personal benefit. All are prohibited from accepting gifts of more than nominal value from vendors, or facilitating contracts between the Monroe Plan and companies in which they have a financial interest.

Avoiding Kickbacks and Referral Fees

Employees are prohibited from offering or paying anything of value, whether in cash or in kind, to another party in return for the referral of a member to the Monroe Plan. The Monroe Plan prohibits employees from soliciting or receiving anything of value, whether in cash or in kind, from another party in return for the referral of a member to another health care provider.

You are planning Monroe Plan’s summer picnic and your brother-in-law is a caterer. Can you hire him to cater the picnic? Even though he may be a great caterer, and cost effective, we are prohibited from making decisions that may result in your personal gain – or even from creating the APPEARANCE of personal gain.

Organizational Assets

Our public reputation is an important asset. We must use our assets and business information in a responsible manner and in the best interests of our stakeholders.

Submitting Complete and Accurate Reports

All employees involved in the process of preparing and submitting cost reports must strive to ensure that these reports are accurate and complete. Expenses reflected on cost reports must have been actually incurred and properly allocated in accordance with program guidelines. The same standards of accuracy and completeness apply to any other reports or data regarding the Monroe Plan's operations submitted to government agencies or private parties.

Accounting and Business Transactions

Certain employees have responsibility for accounting for business transactions and preparing accurate financial statements. The overall responsibility, however, extends to each and every employee. All of us must ensure that all transactions are documented in a manner consistent with their substance. Employees shall seek reimbursement for expenses only to the extent such expenses have been incurred in the course of carrying out their job duties and in accordance with the Monroe Plan's expense reimbursement policies.

Use of Organizational Assets

Every employee has a responsibility to protect our assets against loss, theft and misuse. Our assets include cash, facilities, equipment, inventory, staff, computer systems and software, and other intellectual property. Our funds and property should only be used for the benefit of the Monroe Plan, and solely for the purpose of carrying out specific job responsibilities. Employees may not use their affiliation with the Monroe Plan to promote any business, charity or political cause.

Using Resources Exclusively for Tax Exempt Purposes

The Monroe Plan's primary purpose as a tax-exempt organization is arranging for and managing the delivery of medical services. Employees may not use the Monroe Plan's resources to engage in any business activity that is outside the scope of the Monroe Plan's tax-exempt purpose without the approval of the Compliance Officer.

Outside Employment and Activities

Monroe Plan employees should avoid any activity or personal financial interest that could adversely affect the independence or objectivity of their judgment, interfere with the timely and effective performance of their duties and responsibilities, or that which could discredit, embarrass or conflict with the best interests of the Monroe Plan.

You use the office copier to make flyers for a Stroke Prevention Walk. You are pretty sure this is ethical, because Monroe Plan supports health outcomes. Is this OK?

Using the office copier, or any other Monroe Plan property for volunteer activities is wrong, even for a good cause, and even if some of our members participate in the activity. However, there is one way to stay within the Code of Conduct – by getting prior approval from the Compliance Officer.

Communities and Government

Monroe Plan conducts business in many communities and collaborates with many governmental agencies throughout New York State and nationwide. We must be responsible citizens wherever we do business.

Complying with Government Contracts

The Monroe Plan is a subcontractor to health plans operating under state and federal government contracts. In this capacity, the Monroe Plan may be required by contract to comply with rules and standards governing Medicaid, Medicare and other state and federal health care programs. Employees are expected to familiarize themselves with the contract requirements applicable to their duties and carry out their responsibilities in a manner consistent with these obligations.

Political Activities

Federal law and company policy prohibit the use of company funds, assets, services or facilities on behalf of a political party or candidate except under certain limited circumstances.

Government Information Requests

Employees and contractors are expected to fully cooperate in all government audits and investigations. All subpoenas and other governmental requests for Monroe Plan documents should be forwarded to the Compliance Officer who is responsible for coordinating such requests with legal counsel.

Non-Retaliation Policy

No employee who files a report of suspected fraud, abuse or other improper activity in good faith will be subject to any retaliation by the Monroe Plan in any form, including but not limited to termination, suspension, demotion, failure to consider for promotion, harassment or reduction in compensation.

I feel uncomfortable about reporting an incident, and worry about being harassed. What protection do I have?

Monroe Plan will not tolerate any form of retaliation against you for reporting actions against our Code of Conduct. You should bring this to your supervisor's attention, and appropriate action will be taken against any co-worker who harasses or threatens you. You can always call the Compliance Hotline for help.

I am working on a political campaign for a local candidate. Can I display posters and hand out flyers to my co-workers?

No, it is against the Code of Conduct to use company assets, or your work time for any political activity.

Employees

Monroe Plan's success depends on the contributions of many people. We should be fair and respectful in our dealings with our fellow employees.

Valuing Diversity

At the Monroe Plan our employees are our greatest asset. We believe that diversity and inclusion are key to creativity and innovation and gives us a competitive advantage in our marketplace. We are committed to creating a respectful and supportive work environment that values individual differences and affords each person the opportunity to contribute fully to our goals and objectives.

Equal Opportunity Employment

Each Monroe Plan manager and employee shall take whatever action is necessary to ensure that all employees are afforded an equal opportunity in recruitment, employment, promotion, transfer, discipline including termination, compensation, benefits, demotion, layoff, training and educational programs without regard to race, age, color, religion, sex, national origin, disability, veteran status or other status covered by any applicable laws.

Prohibition of Harassment

Monroe Plan will not tolerate harassment of its employees by anyone, including unwelcome conduct, whether verbal, written or physical, that is based upon a person's sex, race, color, religion, national origin, age, disability, veteran status, or other status covered by any applicable laws.

Workplace Safety

Each employee is responsible for observing the safety rules and practices that apply to his or her job. Employees are also responsible for taking precautions necessary to protect themselves and their co-workers, including immediately reporting accidents, injuries and unsafe practices or conditions.

Drugs and Alcohol

Employees are prohibited from possessing, selling, using, distributing or offering to others any illegal drugs or controlled substances while on company business or on company premises. Employees may not consume alcohol at any time when it may impair the ability to perform job duties, endanger others, or reflect adversely on our reputation.

A co-worker makes many jokes about gender and ethnic groups. Several of us find this objectionable and offensive. What should we do? If asking the co-worker to refrain from making these comments doesn't work, report your concerns to your supervisor or Human Resources.

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