

Code of Conduct

The purpose of this code is to guide the conduct of CREATE, Inc.'s employees, contractors, board members, and volunteers.

The primary goal of CREATE, Inc. is to promote recovery from the illness of addiction. CREATE, Inc. is committed to recognizing the inner goodness of a person and enhancing it.

All employees, contractors, board members, officers and other individuals associated with the organization shall perform their duties in good faith and to the best of their ability and refrain from any illegal conduct.

No employee, contractor, board member, officer or other person associated with the organization shall obtain any improper personal benefit by virtue of his or her relationship with the organization. No employee or other individual associated with the organization may engage in any conduct that conflicts - or is perceived to conflict - with the best interests of the organization. Further, individuals associated with the organization must actively avoid placing themselves in situations that could be viewed by others as compromising the individual's best judgment.

When the organization decides to enter into an agreement or arrangement with another healthcare entity or practitioner to provide services, that decision must be free of any improper influence. Thus, if you or any immediate family member is already an employee, consultant, owner, contractor or even a passive investor of an entity that: (i) engages in any business or maintains any relationship with the organization, (ii) provides to, or receives from, the organization any participant referrals, or (iii) competes with the organization, you must complete an "Outside Interest Form" and submit it to the Compliance Officer. In this way, the organization can be assured that our business relationships are free from improper influences.

Employees may not accept gifts from participants, vendors or others associated with the organization without first receiving explicit authorization from the Compliance Officer. Further, you may not offer anything of value to an entity doing business with the organization or to someone who is a source of referrals for the organization without first receiving explicit authorization for such an offer from the Compliance Officer. This policy ensures that your activities will be "at arm's length" and free from outside influence. Contracts entered into by CREATE, Inc. shall be at fair market value. No agreement shall be entered into without the approval of the Executive Director.

Any waiver of deductibles or copayments must be reported to and approved by the organization's Compliance Officer. Routine waivers of deductibles and/or copayments will not be permitted.

Employees and others involved in billing claims cannot bill for any amount other than in

accord with the organization's usual and customary fee for the particular service being provided and according to the organization's policies and procedures or contracts with payors, as applicable. All communications with outside persons regarding services or billings and all information received related to billing should be clearly and comprehensively recorded in the appropriate files.

Claims are only to be submitted for services that are properly ordered as medically necessary. If an individual associated with the organization becomes aware of or discovers any claims that are false or are for services that are not properly ordered as medically necessary, this information must be reported to the Compliance Officer. The Agency is committed to billings which are accurate, reliable, timely and valid.

Maintaining appropriate documentation is vital to the continued success of the Agency. Employees, contractors and agents are expected to maintain complete, accurate and contemporaneous records as required by the Agency and payors. Records must reflect the actual service provided, containing all required information and signatures.

Employees, contractors, board members, officers and other individuals associated with the organization will not use confidential or proprietary information for their own personal benefit or for the benefit of any other person or entity, while working for the organization, or at any time thereafter.