WILL COUNTY COMMUNITY HEALTH CENTER

TITLE: Standards of Conduct for Governing Council Members, Officers Employees, Contractors, and Agents of the Health Center	SECTION: Corporate Compliance	POLICY NO. CC-0002
EFFECTIVE DATE: 4/27/26	SUPERSEDES: 5/5/10, 1/14/13, 11/7/19, 12/29/16, 6/8/23 5/1/24	Pages 1 of 4

POLICY: WCCHC (Health Center) affirms its commitment to compliance with all federal and state laws with an emphasis on preventing fraud and abuse. Standards of conduct are set forth in the Center's mission, goals and ethical principles and establish the organizations' expectations that anyone who provides care on behalf of the organization or is otherwise authorized to act on its behalf (Governing Council, executive & management staff, employees, volunteers, contractors and consultants) must conduct him or herself in a professional and ethical manner.

PURPOSE: The purpose of these standards is to provide safeguards to ensure the Health Center's compliance with laws and regulations relating to fraud and abuse as well as to prevent members of the Governing Council, officers, employees contractors and agents of the Health Center from (1) using their positions for purposes that are, or giving the appearance of being, motivated by a desire for private financial gain for themselves or others such as those with whom they have family, business or other ties, and, (2) from violating their duty to the Health Center by inappropriately disclosing confidential information about the Health Center.

SCOPE: Applies to Governing Council Members, Officers Employees, Contractors, and Agents of the Health Center

COMPLIANCE WITH LAWS AND REGULATIONS

- ACCURATE CLAIMS FOR REIMBURSEMENT
  - All claims for reimbursement to third party payers, including but not limited to Medicaid and Medicare that are submitted on behalf of the Health Center, as well as those to uninsured patients, must contain accurate and true information and must only reflect services provided as supported by the patient's medical record.
- MEDICAL NECESSITY
  - No supplies or services will be billed by the Health Center unless they are reasonable and medically necessary, as evidenced by a fully and accurately documented medical record.
- ACCURATE BUSINESS RECORDS
  - All business records completed by Health Center employees and contractors must accurately reflects the matter to which it pertains. No entry in a Health Center record should disguise any material fact regarding the business transaction.
- REFUNDS
  - If the Health Center determines that it has been overpaid by a government program, third party payor or patient, it will promptly refund the payment to the proper party in accordance with Health Center policies and procedures.
- KICKBACK PROHIBITION
  - No Health Center employee and/or independent contractor will offer, provide, solicit or accept anything of value from any person in return for the referral of Medicare/Medicaid or other government sponsored patients to the Health Center, or in return for influencing or engaging in any related business transaction, directly or indirectly, involving the care provided to Health Center patients.
- CO-PAYMENTS / DISCOUNTS
  - The Health Center must not waive the collection of insurer's co-payment obligations unless it establishes that the patient meets the Health Center's sliding fee scale requirements. A record of the patient's financial indigence should be kept by the Health Center.
- HONEST DEALING WITH GOVERNMENT AUDIT AND INVESTIGATION
  - No Health Center employee or contractor will attempt to improperly influence actions or decisions made by the government bodies, officials, employees or contractors.
- COOPERATION AND GOVERNMENT AUDIT AND INVESTIGATION
  - The Health Center will be cooperative and truthful in its dealings with any governmental inquires or request, including audits, surveys and certifications reviews.

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PRIVATE FINANCIAL GAIN

- FINANCIAL INTERESTS
  - No employee, contractor, agent, officer or member of the Governing Council of the Health Center may participate in the selection, award or administration of a contract in which Federal funds are used, in which he/she or his/her immediate family (i.e., spouse, children, parents, or siblings through blood, adoption or marriage) has a financial interest or with whom he/she is negotiating or has any arrangement concerning employment.
  - The Health Center requires that all employees, contractors, agents, officers and members of the Governing Council disclose in writing (and update at least annually) all business and family relationships which might potentially create a conflict of interest. In addition, employees, contractors and agents, must disclose to the CEO (and the CEO must disclose to the Governing Council and Executive Director of the WCHD) in writing the specifics of any plans to accept supplemental outside employment so the Health Center and Health Department may determine whether such outside employment has the potential for conflicting with the interests of the Health Center/Health Department.
  - If an employee, contractor, agent, officer or member of the Governing Council believes that he/she, a member of his/her immediate family or partner has a financial interest in a Federally funded contract of the Health Center, he/she must immediately disclose this in writing to the CEO. Disclosures by officers or members of the Governing Council must also be made to the chairman (and if it is the Chairman who has such a financial interest, he or she must make disclosure to the Vice-Chairman).
  - No member of the Governing Council may vote on any matter which may directly or indirectly result in financial gain to that member, or which may conflict with that member's obligations to another organization's governing council or to his/her employer. Provided that the member of the governing council has first disclosed conflict or potential conflict, and abstains from voting in that regard, he/she may participate in discussions relating to that matter.

- COMPENSATION TO MEMBERS OF THE GOVERNING COUNCIL
  - Within the limits of available funds, the Health Center may reimburse members of the Governing Council for reasonable expenses actually incurred by reason of their participation in Board activities, e.g., travel expenses, meals, and incidentals.
  - The Health Center will not compensate members of the Governing Council for services rendered in the ordinary course of service as members of the Governing Council. However, if a member of the Governing Council who is not an officer is uniquely qualified to perform professional services for the Health Center, the Health Center may consider contracting with that member of the Governing Council for such professional services, provided that the affected member of the Governing Council does not participate in Board discussions or vote on his/her selection, the contract is in all respects "arms'-length," consistent with Federal procurements standards if federal funds will be used, and in the best interests of the Health Center.

- GIFTS / GRATUITIES
  - "Gift" means any gratuity, discount, entertainment, hospitality, loan, forbearance, or other tangible or intangible item having monetary value including, but not limited to, cash, food and drink, and honoraria for speaking engagements related to or attributable to government employment or the official position of an officer or employee.
  - The employees of the Health Center will abide by the Will County Ethics Ordinance, Article 3 on Gift Ban as attached.
  - The employees, contractors, agents, officers, and members of the Governing
  - Council of the Health Center may not solicit or accept gratuities, favors or anything of value from contractors or potential contractors of the Health Center.
  - Any employee, contractor, agent, officer or member of the Governing Council shall decline or return any gift and notify the CEO of such gift.

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- COMPETITION
  - It is the policy of the Health Center to conduct all procurement transactions in a manner to provide, to the maximum extent practical, open and free competition. The Health Center will be sensitive to, and seek to avoid, organizational conflicts of interest or non-competitive practices among contractors. Consultants who want to bid for a contract from the Health Center are prohibited from drafting the contract's specifications, request for proposals and the like. Awards will be made to the bidder whose bid is responsive to the solicitation and most advantageous to the Health Center, price and other factors considered.
  - The Health Center always retains the right to reject all bids when it is in the Health Center's best interest to do so.
  - The Health Center retains the right to determine with respect to any particular procurement that a sole source procurement is justified.
- BRIBERY
  - The Health Center will make its best efforts to dismiss any employee, remove any officer or member of the Governing Council, and terminate the contract of any contractor/agent found to have offered or accepted a bribe to secure funding from the Health Center.
- CONFIDENTIAL INFORMATION
  - Employees, contractors, agents, officers, and members of the governing council, may gain access to confidential (i.e., non-public) information by virtue of his/her position within the Health Center. Employees are required to sign a Confidentiality Agreement that specifically limits the context in which, and persons to whom, confidential information may be communicated.
  - Officers and members of the Governing Council may not communicate confidential information about the Health Center to anyone who is also not an officer or member of the Governing Council, respectively, absent the explicit authorization of the full Governing Council. If, as a result of negotiations in which the Health Center is engaged, an officer or member of the governing council gains access to confidential information of another entity, the officer or member of the governing council may not communicate this information about the other entity to anyone who is not also an officer or member of the governing council, respectively, without the authorization of the full governing council. If the Health Center executes an agreement with another entity which agreement includes provisions governing confidentiality of information, all officers and members of the governing council are bound by those provisions and required to comply with them.
- OTHER
- POLITCIAL ACTIVITIED
  - No employee, contractor, or agent to the Health Center may engage in political activities during business hours. No employee, contractor, agent, officer or member of the Governing Council may use the Health Center's name, facility, or resources in connection with political activities. In particular, no Federal grant or related funds may be used to support the costs, if any are incurred, of prohibited lobbying activities as defined in 0MB Circular A-122, Department of Health and Human Services ("HHS") rules implementing the Byrd Amendment and HHS appropriation riders.
  - Employees, contractors, agents, officers and members of the Governing Council may not solicit political support in any manner, which might suggest that the Health Center supports any political party or candidate. No employee, contractor, agent, officer or member of the Governing Council shall, in any manner, solicit financial assistance or subscription for any political party, candidate, fund, publication, or for any other political purpose from Health Center employees in the workplace or otherwise in an employment-related setting.

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- NEPOTISM
  - The Health Center will not hire any individual who is related to an employee or contractor of the Health Center if, in the position being applied for, the applicant will supervise, or be supervised by, the related employee or contractor. Every applicant for employment with the agency must disclose any and all family and business relationships with employees, contractors, agents, officers and members of the Governing Council of the Health Center.
- VIOLATIONS OF STANDARDS OF CONDUCT
  - Employees, contractors, and agents who violate these standards may, depending on the severity of the violation, be subject to oral admonishment, written reprimand, reassignment, demotion, suspension or separation, in addition to legal penalties which might apply. Officers and members of the Governing Council who violate these standards may, depending on the severity of the violation, be subject to oral admonishment or removal from theBoard.

Attachment A: Certification of Commitment

CEO/Designee — Date: 6-16-26

CMO/Designee — Date: 6-9-26

CDO/Designee — Date: 6/16/26

DOO/Designee — Date: 6-11-26

Approved by GC on: 6/9/26

Will County
Health Department &
Community Health Center

Certification of Commitment

I hereby acknowledge and certify that I have received and reviewed a copy of the Health Center's Standards of Conduct and understand that it represents mandatory policies of the Health Center.

By signing this form below, I agree to abide by these Standards of Conduct during the term of my employment or while otherwise authorized to serve on the Health Center's behalf. In addition, I acknowledge that I have a duty to report any suspected or known violation of the Standards of Conduct to the Compliance Officer/Contact.

Please return the completed, signed Certification of Commitment to the Compliance Officer/Contact.

_____ _____

Signature Date

_____

Printed Name

_____

Title/Position

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