

CODE OF CONDUCT

Doing the right thing,
even when no one is looking.



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From the President | CEO

Dear Colleagues,

This Code of Conduct manual expresses Mosaic's commitment to always do the right thing, even when no one is looking. It is an important guide and is essential to the work that you do to support those who receive services from Mosaic. As someone who is fulfilling Mosaic's mission of service and advocacy, you are expected to make a personal commitment to uphold the principles, policies and guidelines outlined in this resource. The people we serve, along with their families, fellow staff members and all others engaged with our ministry, count on each of us to act with a high degree of honesty, integrity and ethics.

In this manual, you will read practical, real-life guidance to help you make decisions and take action in your work. We cannot anticipate every situation that may arise, but the topics included in this manual deal with issues you routinely encounter. Since there are complex rules, laws and regulations Mosaic must follow, it is important that you understand the implications of your on-the-job decisions and actions. It is your responsibility to read this manual and follow these standards and guidelines. If you do not understand any part of it or have a question about it, please contact someone within Mosaic and ask.

If you have observed or heard about a work situation that may violate this Code of Conduct, you should contact the Mosaic Compliance Department or the Confidential Reporting Program. Our commitment to integrity demands that each of us, regardless of our job title or affiliation with the organization, is accountable not only for our own actions but also to report any known or suspected compliance issues. Only through each of us taking personal responsibility for our actions will we fulfill our promise to do the right thing, even when no one is looking.

I know that every day we have thousands of staff members and contractors who have the opportunity to work side-by-side with people as we support them to pursue a life of possibilities. This is an incredible opportunity for us to make a real difference in the life of another person. Along with that awesome opportunity comes awesome responsibility because each of us makes decisions that affect individuals as well as the organization.

Thank you for your partnership in creating a life of possibilities for people with intellectual disabilities.



Linda Timmons
Mosaic President | CEO

From the Compliance Department

Dear Colleagues,

It is the goal of Mosaic's Compliance Department to honor our core value of Integrity by fostering an organization-wide understanding of our commitment to compliance with the law and ethical behavior.

One of the many challenges Mosaic faces is to stay up-to-date on complex federal and state regulatory requirements that we must adhere to while providing services to people with intellectual disabilities. This manual was created to provide guidelines and examples of Mosaic's expectations for ethical behavior as related to employees, officers, board members, volunteers, and contractors. This manual should create an awareness and support a commitment to ensure that you are carrying out your responsibilities in accordance with laws, rules, regulations, or contractual agreements.

The Code of Conduct is just one of many resources that is made available to you by the Compliance Department to support an environment of sound ethical behavior. Other resources include the Confidential Reporting Program, compliance-related policies and procedures, and friendly, knowledgeable Compliance Department staff.

The key to the success of our Compliance Program will be each of us taking on the responsibility of not only working to live up to the Code of Conduct, but taking responsibility to report if others are not meeting his or her obligations as detailed in the Code of Conduct. Thank you for doing your part to help provide services and supports to people with intellectual disabilities in a manner consistent with our mission, values, and with a high standard of integrity.



Sarah Khalili, JD
Vice President, Compliance

Decision-Making Guide

In our daily work, we are sometimes faced with situations where we must decide whether a certain action or decision is the right action or decision. Consider the following questions to help make good decisions:

- Does my action or decision comply with laws and regulations pertaining to Mosaic's mission?
- Is my action or decision consistent with Mosaic policies and procedures?
- Is the action or decision based on the best interest of Mosaic and not my own personal interest?
- Will my action or decision protect Mosaic's reputation as a law-abiding, ethical, and responsible organization?
- Would I want my action or decision published in my community's newspaper?

If you can answer "yes" to all of these questions with confidence, then it is likely that your action or decision is appropriate. If you cannot confidently answer "yes" to all of these questions, do not take action or make a decision until you are clear that what you are about to do is the right thing.



When in doubt, ask!

Keep asking until you get an answer that makes sense. There are several ways to gain insight if you are uncertain whether an action or decision is appropriate:

- Talk to your supervisor. If you are not comfortable discussing the issue with your supervisor, discuss the issue with a higher-level manager.
- Discuss the issue with a member of the Compliance Department at 877.366.7242 or at compliance@mosaicinfo.org.

Why Do We Need a Code of Conduct?

Mosaic is a faith-based organization that serves people with intellectual disabilities. We believe that every individual is a person of worth and we strive to help the people we support create the life they desire. In doing this, we receive guidance from Mosaic's values: safety, respect, connection, and integrity. Integrity is the foundation on which all of the other values are built. Integrity causes us to follow safety procedures, treat people with respect, maintain high standards of quality in our work, use our resources wisely and honestly, and be active members of our communities. Integrity is doing the right thing, even when no one is looking.

The Code of Conduct provides a frame-work of ethical standards and obligations that guide our work performance, professional standards, and how we conduct our relationships with others. Each standard laid out in the Code of Conduct provides information on how to do the right thing in many situations we encounter in our daily work. An example is also included at the end of each section to demonstrate how to apply these standards. If you encounter a situation that is not addressed in the Code of Conduct, please contact your supervisor or the Compliance Department.

We hope that you will find Mosaic's Code of Conduct to be an important tool in how to perform your job duties with integrity while remaining true to our mission.



Mosaic's Mission:

Embracing God's call to serve in the world, Mosaic advocates for people with intellectual disabilities and provides opportunities for them to enjoy a full life.

Accurate and Proper Handling of Records

Standard of Conduct

All records within Mosaic must be accurate and created, maintained, secured, retained, or destroyed within Mosaic policy guidelines.

Summary

It is the duty of all Mosaic employees who have responsibility for records to ensure that they are accurate, complete, and properly maintained. This applies to electronic records as well as paper records. Records retained must be truthful and accurate and not contain false or misleading information. It is important to retain such records because many of these documents are used for billing, audits, licensing or regulatory reviews, and to receive funding.

Mosaic has established a record retention policy based upon legal requirements and industry best practices. This policy contains information on how long various types of records must be retained. Please refer to this policy and the related procedures if you have any questions about record retention.



I have been going through some old employee files and some of the files that I have come across belong to employees who haven't been here for about seven years! Do I still need to hold on to those files?

According to Mosaic policy, employee information must be retained for five years from an employee's termination date. There is, however, some employee information that needs to be kept for a longer period of time. For example, disability leave documents for a work-related injury must be retained for 30 years from the date of the injury. If you are in doubt, refer to your agency's policy for record retention. If your agency does not have a record retention policy, use Mosaic's organization-wide policy on record retention. If you are still unclear, talk to your supervisor.

Billing for Services

Standard of Conduct

Claims submitted to Medicare, Medicaid, or other payers must only be for services provided and only for allowable costs as identified by the applicable contract. This includes coding and billing requirements.

Summary

It is Mosaic's policy that all daily activities of the people we support must be documented in accordance with contract requirements. You must also make sure that documentation for the services you provide is correct, that programs are implemented on time, that people are receiving the services and supports Mosaic is being paid to provide, and that attendance records are correct. It is important to note that documentation shows the work you have done so that Mosaic can be paid by Medicaid. In addition, it also reflects the quality of services Mosaic provides to the people we support. Every person signing or electronically submitting documentation is verifying the accuracy of the information. Signing or electronically submitting documentation you know or suspect is inaccurate is considered falsifying documentation and will result in disciplinary action up to and including termination.



I was really busy last week and I didn't carry out a program where I was supposed to take a person in service to the grocery store so that he could buy groceries for himself. I feel bad for not completing this and it is the only time that I have not helped him with this task. I did talk to my supervisor about it and she said that we should probably document that he went to the store so that we get reimbursed for completing his program. Is it okay for me to document that we went to the store since my supervisor says it's okay?

No, documenting that you completed a client's program when you did not do it is not okay. This situation should be reported to the Confidential Reporting Program since it involves falsification of program records. Always make sure that you document only the services provided and that the information is accurate. If you need additional information, please refer to the following Mosaic policies:

- Documentation and Billing for Services
- Medicaid Repayment
- Prevention of False Claims

Contact the Compliance Department for additional information.

Confidentiality

Standard of Conduct

To protect the rights of people receiving and providing services, no employee shall discuss or reveal confidential information, other than to those that have the need or the right to know, during the course of their employment or any time following the termination of employment.

Summary

While working, employees may overhear statements or become aware of confidential information regarding people we support or fellow employees. This includes but is not limited to:

- Medical information
- Information about people in service and information gathered about them in the process of an investigation or inquiry
- Financial information
- Legal information
- Services or activities provided to people in service

Do not disclose confidential information to other Mosaic employees except on a need-to-know basis. In addition, this information should not be disclosed to anyone outside of Mosaic – including friends, family, business or social acquaintances, or others. Mosaic has the same expectations for confidentiality regarding its business information. Information that is not a matter of public record or released with the permission of Mosaic leadership should not be publicly revealed. Releasing this type of information could be detrimental to the well-being of the people we support, our employees, or to Mosaic as a whole.

I heard that one of my co-workers was under investigation for abusing a person in service. They were suspended, but now they are back at work. How come no action was taken with them?

Information collected during the course of an investigation and any action taken is considered confidential. If the allegation was found to be validated, any action taken resulting from the findings would also be considered confidential.

Confidential Reporting Program

Standard of Conduct

Mosaic's Compliance Department operates the Confidential Reporting Program. The Confidential Reporting Program allows anyone affiliated with Mosaic a means of reporting suspected violations of the Code of Conduct and any applicable state and/or federal laws, rules, and regulations. The Confidential Reporting Program can be contacted one of four ways:

- Call the toll-free Compliance Hotline at 800.443.4899
- E-mail compliance@mosaicinfo.org
- Contact the Compliance Department directly at 877.366.7242
- Mail to 4980 S. 118th Street, Omaha, NE 68137

Summary

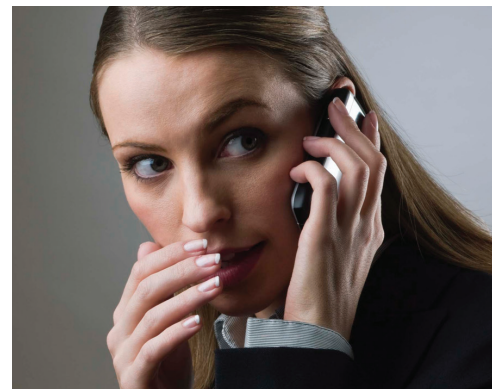
Examples of items that should be reported include, but are not limited to:

- failure to appropriately document services that are billed and/or improper billing of services;
- failure to appropriately document expenses;
- improper actions regarding Mosaic finances or finances belonging to the people we support over \$250.00;
- improper or unauthorized use of Mosaic purchasing card;
- falsification of time sheets (if the time has already been paid);
- theft of Mosaic property or property belonging to the people we support;
- conflict of interest issues;
- HIPAA violations; and
- retaliation against employees for reporting a concern to the Confidential Reporting Program.

The Compliance Department will make every effort to keep the identity of the reporter confidential if requested. There may, however, be a point where their identity may become known or may have to be revealed in certain instances. Reporters can contact the Compliance Hotline anonymously, but this may limit the ability to collect additional information regarding a concern.

The Compliance Department staff will review all information reported, gather as much information as possible from the reporting party, complete a preliminary inquiry into the issue, and then determine if further action should be taken.

Mosaic will not take any adverse action or retribution of any kind against someone who makes a report, in good faith, to the Confidential Reporting Program.



I am a certified CPR instructor. Today, I received a frantic call from the manager at a residential site that is having a licensing survey tomorrow. Apparently, the two staff people who work the overnight shifts alone are not currently certified in CPR, which is a state regulation. This manager asked me to sign a training sheet that the staff received the training. She claims that it will take a while to get the CPR card anyway, and then we can get them trained after the survey. I am not feeling right about this. Should I report it to the Confidential Reporting Program?

Yes, this needs to be reported to the Confidential Reporting Program because it involves the falsification of training records for a licensing review, which is part of a state regulation.

Conflict of Interest

Standard of Conduct

Employees are expected to conduct themselves with personal integrity, ethics, honesty, and diligence in performing their duties for the organization. Employees are required to avoid placing themselves in situations where their personal interests actually, potentially, or may appear to be in conflict with the interests of Mosaic. This standard applies to all Mosaic employees.

Summary

A conflict of interest occurs if an outside interest or activity may influence, or appear to influence, your ability to meet your job responsibilities for Mosaic. Some examples of real or perceived conflicts of interest include, but are not limited to:

- any employment-related action that involves a family member, spouse, or significant other, such as a family member supervising another family member;
- hiring any family member, spouse, or significant other as an independent contractor (host home, repair/maintenance, or any other type of service provision); or
- accepting employment or compensation that might impair the individual's independent judgment in the performance of duties.

Employees are required to file a Conflict of Interest Disclosure form upon hire and on an annual basis thereafter. In addition, employees are required to complete an updated Conflict of Interest Disclosure form when situations arise that create an actual, potential, or perceived conflict of interest as soon as they become aware of them.

My husband is starting his own lawn mowing and snow removal business. He is certain that he could provide these services to Mosaic at a much lower cost than our current contractor. Can we contract with him?

Generally speaking, Mosaic tries to avoid purchasing goods and services from our employees or immediate family members. However, in some of our agencies, there may be a limited number of contractors for particular goods and services. Because of your relationship, you should stay out of this purchasing decision process, and the manager should make an independent decision about who can bring the best value to Mosaic. If your husband's business is selected by the manager to provide this service, both you and your husband must disclose your relationship.

Discrimination and Harassment

Standard of Conduct

Mosaic is committed to providing a workplace that is free of sexual harassment, bullying, and harassment based on race, color, sex, age, gender, gender identity or expression, sexual orientation, religion, ethnic or national origin, marital status, genetic information, present or past history of mental disorder, intellectual or physical disability. All employees, including managers and supervisors, are expected to uphold this standard of conduct and take the appropriate measures to ensure that such conduct does not occur.

Summary

Mosaic believes that the fair and equitable treatment of employees and the people we support is critical to fulfilling Mosaic's mission and goals. Any form of discrimination or harassment is prohibited. Do not encourage or tolerate any form of workplace discrimination or harassment, including degrading or humiliating jokes, slurs, intimidation, or other harassing conduct that creates a hostile work environment.

An employee who feels he or she has been discriminated against or harassed in the workplace should first make it clear to the person discriminating or harassing that the behavior is not welcome and ask that it be stopped. If the behavior continues or the employee feels uncomfortable confronting that person, the employee should immediately report the incident or incidents to his or her immediate supervisor or any member of management staff the employee feels comfortable talking to. Employees may also contact the agency's Human Resources Department or Mosaic's National Human Resources Department for assistance. Employees will not be discriminated or retaliated against as a result of filing a discrimination or harassment complaint.



I am a new employee who works in a home where several of the employees are close friends. For some reason, they have decided that they don't like me and have been going out of the way to make life miserable for me at the home. They have been ignoring me when I have a question, laugh and whisper about me when I walk into the room, and one of them even tripped me when I was bringing in groceries; but denied doing it. It's getting to the point where I dread coming into work and I feel like I can't give the people we support my focus because I'm so worried about what the other employees will do to me next. I am definitely not comfortable enough to tell them on my own to stop. What should I do?

You should speak to a member of the management team about the situation and how it is negatively impacting your daily work so that the situation can be looked into. If you are uncomfortable going to your agency's management team, you should contact your agency's Human Resources Department or the national Human Resources Department and they will assist you in dealing with the situation.

False Claims Act

Standard of Conduct

All Mosaic employees and contractors providing services must know and comply with the federal False Claims Act and any applicable state false claims laws, rules or regulations.

Summary

The False Claims Act is a federal statute that covers fraud involving any federally funded contract or program (including Medicare and Medicaid). It is illegal to knowingly present, or cause to be presented, a false or fraudulent claim or statement to the government. The term “knowingly” means acting not only with actual knowledge, but also with deliberate ignorance or reckless disregard of the truth. Examples of a false claim include:

- falsifying records;
- making false statements;
- double-billing for items or services;
- submitting bills for services never performed;
- claims that characterize the service differently than the services actually provided;
- claims which do not comply with applicable program or contractual requirements;
- unbundling of charges where bundling of such charges is required; and
- submitting claims for payment for which there is no supporting documentation available.

Penalties for violating the federal False Claims Act are significant. Financial penalties can total as much as three times the amount of the claim plus fines of \$10,781.40 to \$21,562.80 per claim. (These amounts are subject to change.) In addition, an organization that violates the False Claims Act can be excluded from participating in Medicare or Medicaid programs and may not bill Medicare or Medicaid for any services provided in the future.

To encourage people to come forward and report false or fraudulent claims, the FCA includes a “qui tam” or whistleblower provision. This provision allows any person with actual knowledge of false claims activity to file a lawsuit on behalf of the U.S. Government. If the U.S. Government determines the lawsuit has merit and decides to intervene, the whistleblower is entitled to receive 25%–30% of the monetary recovery.

There are several things you can do to ensure that Mosaic does not submit any incorrect claims to Medicaid agencies. Make sure that all documentation related to billing is true and accurate when submitted for processing. You should also make sure the quality services that Mosaic is contracted to provide are being provided to the people we support. Mosaic has training and several policies and procedures to prevent the filing of false claims. Become familiar with this information and do not be afraid to bring an error or problem to management’s attention so the situation can be corrected. If you have any questions about any of these resources, please ask your supervisor or contact the Compliance Department.

Help! I mistakenly billed Medicaid for a person in service that was in the hospital and not in our care. It was only for one day and I am so swamped that going back to correct this is really going to put me behind! Even though I don’t want to get into this habit, I’ve decided that I’m just not going to say anything and let it go through. What do you think?

Saying nothing about the error is definitely not a good idea. Not only would this lead to big fines and put Mosaic in jeopardy of losing Medicaid billing privileges, but you as an individual could also be penalized. The best way to handle this is to report your mistake to the Compliance Department and go through your state’s appropriate process for correcting Medicaid billing errors. Even though it will cause you extra work, the consequences of not reporting it outweigh the extra paperwork.

Gifts

Standard of Conduct

Other than charitable giving, Mosaic has a no gift policy. To prevent perceived or real conflicts of interest, Mosaic employees are expected to make decisions in the best interest of Mosaic and the people we support while free from outside influences. This includes gifts from loved ones or family members of the people we support and persons with whom Mosaic does business.

Summary

While we understand that community members, family members and loved ones of the people we support like to show their appreciation to staff members, Mosaic's goal is to make sure that the acceptance of gifts or services by staff members does not affect the performance of their duties. Examples of appropriate gifts for staff members include:

- thank-you cards
- letters of appreciation
- holiday cards
- baked goods or other snacks

If an employee has any questions regarding the appropriateness of a gift, please contact your supervisor or the Compliance Department.



A parent of a person in service wants to give me a gift. They say they want to let me know how much they appreciate the services we provide to their daughter. It's a piece of jewelry. Can I accept it?

No, we understand that both giving and receiving gifts or tokens of appreciation makes people feel good! However, in order to avoid real or perceived conflicts of interest, Mosaic does not allow employees to accept gifts, monetary gifts, or other services in exchange for the performance of their job. We must work within the policy, yet we don't want to discourage families or loved ones from showing their appreciation in other ways; such as cards, letters, or baked goods.

Health and Safety

Standard of Conduct

All Mosaic employees and contractors providing services must work safely and comply with all applicable safety standards and health regulations set forth by regulatory and accrediting agencies.

Summary

Mosaic strives to provide each employee and person in service with a safe environment. Employees receive safety training appropriate for their job duties. Each employee has a responsibility for taking appropriate precautions to ensure the safety of the people we support, other employees, and themselves. This includes complying with all safety and health requirements and following environmental, safety and health rules, and practices. In addition, employees must report accidents and injuries; as well as unsafe equipment, practices or conditions, to management as soon as they are aware of the problem.



While working my shift in one of our homes, I noticed that the hot water coming out of the faucet was extremely hot! I talked to my co-workers about the concern and they don't think it's a problem, but I am afraid that one of the clients might get scalded if they use the hot water. What should I do?

If you are worried that the temperature of the hot water is a potential safety concern, you should contact your manager. Your manager will check on the situation and find out if there is a problem with the hot water heater or if the temperature dial was moved. Either way, it's important you contact your manager with safety concerns as soon as you become aware of them so that a potentially unsafe situation can be fixed.

Health Insurance Portability and Accountability Act (HIPAA)

Standard of Conduct

All Mosaic employees and contractors providing services must keep protected health information (PHI) confidential in accordance with Health Insurance Portability and Accountability Act of 1996 (HIPAA) policies and procedures.

Summary

HIPAA is a federal law that provides safeguards for the privacy and security of PHI. PHI is information that relates to the health of an individual. It also includes information used to identify an individual; including demographic information. Disclosure of a person in service's PHI should only be made as permitted by Mosaic's HIPAA-related policies. Unsecured PHI means that personal health information is out of our possession and can be easily accessed by others. Because of this risk, care must be taken when dealing with a PHI, such as:

- making sure file cabinets containing PHI are locked when not in use;
- not leaving PHI in your work area where it can be seen by others; this includes electronic information on your computer that you may be working on;
- not sharing PHI on cell phones, including photographs;
- only sharing information on a need-to-know basis and only if you are authorized to do so;
- storing PHI out of sight, in a closed container such as in a folder, clasped envelope, bag, or briefcase if you are transporting such information to meetings or appointments and lock such information in the trunk of a car or put it under the seat of the car;
- de-identifying PHI when necessary;
- shredding documents containing PHI when needed;
- making sure your computer is password protected; and
- making sure that your work containing PHI on your computer is in Citrix;
- not posting photos or information about people in service without proper authorization.

All HIPAA violations must be reported immediately to the Compliance Department so a risk assessment can be done to determine what kind of follow-up will need to occur. Based on the result of the risk assessment, Mosaic must notify a person in service of a breach of PHI without unreasonable delay and in no case later than 60 days from the date the breach was discovered. Mosaic is also required to report breaches of PHI to the U.S. Department of Health and Human Services.

Mosaic will not discriminate or take other retaliatory action against any person for reporting a violation of HIPAA or Mosaic's policies and procedures regarding the privacy, security, and use of PHI. Failure to report any unauthorized disclosures of PHI will result in corrective action, up to and including termination.

The other day, one of the people I support returned home from work for the day and left her program book in one of the seats on the trolley. We notified the trolley company immediately and were able to go to the trolley company and retrieve the program book when the trolley returned back to the station that same afternoon. Everything seemed to be in order and we weren't missing anything. Do I need to report this?

Yes, this needs to be reported to the Compliance Department. Even though the information was complete when it was found, the person's PHI was still unsecured during the time it was on the trolley.

Non-Retaliation

Standard of Conduct

No retaliatory action will be taken against anyone reporting, in good faith, a known or suspected violation or cooperating in an investigation involving a suspected compliance violation.

Summary

No one should be punished for attempting to do the right thing. Because of this, retaliating against someone who reports a known or suspected violation is prohibited at Mosaic. This also includes retaliation against an employee who cooperates in an investigation involving a compliance concern. Retaliation includes, but is not limited to, involuntary transfers, demotion, corrective action, or termination. Any employee, supervisor, or manager who takes part, or threatens to take part, in retaliatory behavior is in violation of Mosaic's Confidential Reporting Program policy and will be subject to corrective action, up to and including termination.

This does not mean that an employee will be exempt from corrective action resulting from improper behavior by making a report to the Confidential Reporting Program or Compliance Department. It does mean that the corrective action will not be made more severe because an employee has made the report. Mosaic considers prompt and honest disclosure of any known or suspected violation a positive action by the employee.

My manager asked me to bill the residential hours that I worked under the vocational account code to avoid going over budget. I reported this to the Confidential Reporting Program and my manager got in trouble. On the next schedule that was posted, I noticed my hours had been cut significantly. When I tried to talk to my manager about my hours, she told me, "If you wouldn't have reported the issue with the account code, it wouldn't be a problem now, would it?" I'm pretty sure this is retaliation for reporting her. What should I do?

The first thing you should do is contact the Compliance Department. They will have someone follow up with you regarding the details of your concern. An inquiry or investigation may be conducted to determine if retaliation has occurred. If your concern regarding retaliation is found to be validated, appropriate action will be taken with your manager.

Quality Services

Standard of Conduct

Mosaic is committed to providing person-centered services of the highest quality to the people we support. We will strive to provide all services consistent with our mission, policies, and procedures as well as state and federal laws and regulatory requirements.

Summary

At Mosaic we measure quality by how well we support each person in service. We focus on what each person's preferences, dreams and desires are to help determine what quality means for them. Quality at Mosaic is not a one size fits all service – people are unique and our role as staff is defined by the people we support.

In order to ensure that we are providing quality services, Mosaic utilizes two tools researched and developed by the Council on Quality and Leadership (CQL): Basic Assurances® and Personal Outcome Measures®. Basic Assurances evaluates the quality of services we provide and Personal Outcome Measures evaluates a person's quality of life. One of the components of Personal Outcome Measures is annual interviews that are conducted with each person we serve. These interviews focus on what people want in their lives such as safety, having the best possible health, having friends, and participating in the community.

The information gleaned from these interviews is used to design personalized service and support plans in order to ensure that people we support are receiving the services that will bring them the quality of life they deserve.

In a nutshell, providing quality services means we focus on each person, put our resources and supports to good use and work together in our communities to support quality for people ... one person at a time.



What do quality services have to do with a Code of Conduct?

In short, quality services are what we strive to provide because it is the right thing to do and a responsibility we all have to the people we support, their families, our staff, communities and to our funders. The Code of Conduct guides our work and the decisions we make in providing these quality services. Whether respecting someone's private information, providing a safe environment for people to live and work in, or developing relationships, we should strive to achieve quality.

Requests for Information and Document Review by Outside Agencies

Standard

It is Mosaic's policy to respond to requests for information from governmental or regulatory agencies for purposes such as audits, certification visits, regulatory reviews, and external investigations.

Summary

Mosaic employees and contractors providing services should cooperate with requests for information or document review for governmental and regulatory purposes that sometimes occur as part of business operations. This includes such things as licensure visits, funding source audits, or any record review associated with doing everyday business at Mosaic. If an employee or contractor providing services is not sure whether a request for information or document review is legitimate, he or she should contact their agency's Executive Director who, in turn, should contact their Vice President of Operations or General Counsel.

In responding to these requests, Mosaic employees and contractors providing services must never:

- create false or fraudulent documentation for review by an investigator, regulatory representative or reviewer;
- destroy or alter any company document or record in anticipation of an investigation, regulatory review or audit;
- lie or make false or misleading statements to any investigator, regulatory representative or reviewer; or
- attempt to persuade any other company employee, or any other person, to provide false or misleading information to an investigator, regulatory representative or reviewer or to fail to cooperate with an investigation.

If there are requests for information or document review made outside of normal business operations, employees should not provide Mosaic records without consulting with their Executive Director or department head, Vice President of Operations or General Counsel.

Our licensing survey is this week and we haven't done a fire drill since I've been here. My supervisor says we are going to get in a lot of trouble for not having documentation of having fire drills for the reviewer to see. She wants me to complete documentation that we've had two fire drills in the last six months. I'm not sure what to do—she is my supervisor.

Falsifying documentation for a licensing review or any other type of review should never be done. Not only would falsifying documentation be against Mosaic policy, not having regular fire drills compromises the safety of our employees and the people we support.

Responsible Use of Assets

Standard of Conduct

All Mosaic employees must use Mosaic assets responsibly and appropriately.

Summary

Company assets should only be used for their intended purposes and not for personal, illegal, or other unauthorized purposes. Employees will use and maintain company assets with the utmost care and respect, guarding against misuse, waste, abuse, loss, and theft. All company property should be returned in a timely manner upon request and/or termination of employment.

Use of Mosaic assets for non-company purposes is approved only when specifically authorized by Mosaic policy or procedure or when you receive permission from your supervisor. Approved use of company resources must not result in added costs, disruption of business processes, or additional liability.



My son is in a band and their first show is next week! He created a great flier and he asked me if I could run about 50 copies to hang up around town. I don't see a problem with this because we make so many copies anyway, what's 50 more?

Any time you use Mosaic assets for non-company purposes, you need to get permission from your supervisor. While it may not seem to be a big deal to make 50 quick copies for your son, not asking your supervisor violates Mosaic's policy on the use of company resources.

Social Networking

Standard of Conduct

When employees who have personal sites on social media (Facebook, Twitter, Instagram, SnapChat, LinkedIn, YouTube, blogs, etc.) post comments or information about Mosaic, the content should promote the mission of Mosaic and not in any way be derogatory of the mission, employees, contractors, donors, volunteers or people Mosaic supports. Posts also shall not reveal any proprietary information about Mosaic and employees shall follow the guidelines in the Mosaic Employee Handbook regarding recommendations for current and former Mosaic employees.

Summary

Mosaic recognizes that employees will make personal use of social media sites and may identify themselves as Mosaic employees on those sites. The following guidelines apply:

- An employee shall not reveal proprietary information about Mosaic with the exception of speech protected by the NLRB.
- An employee may not share information regarding people served, including names, photos, etc., on a personal social media site.
- When expressing opinions about disability-related issues, an employee shall make clear that he/she is speaking/writing personally and not on behalf of Mosaic.
- An employee may not post anything on the internet in the name of Mosaic or in a manner that could be reasonably attributed to Mosaic without prior written authorization from the executive director or appropriate senior vice president.
- An employee should not spend work time to update personal information on social media except when asked.

More information about Mosaic and social media sites, can be found in the Employee Handbook.



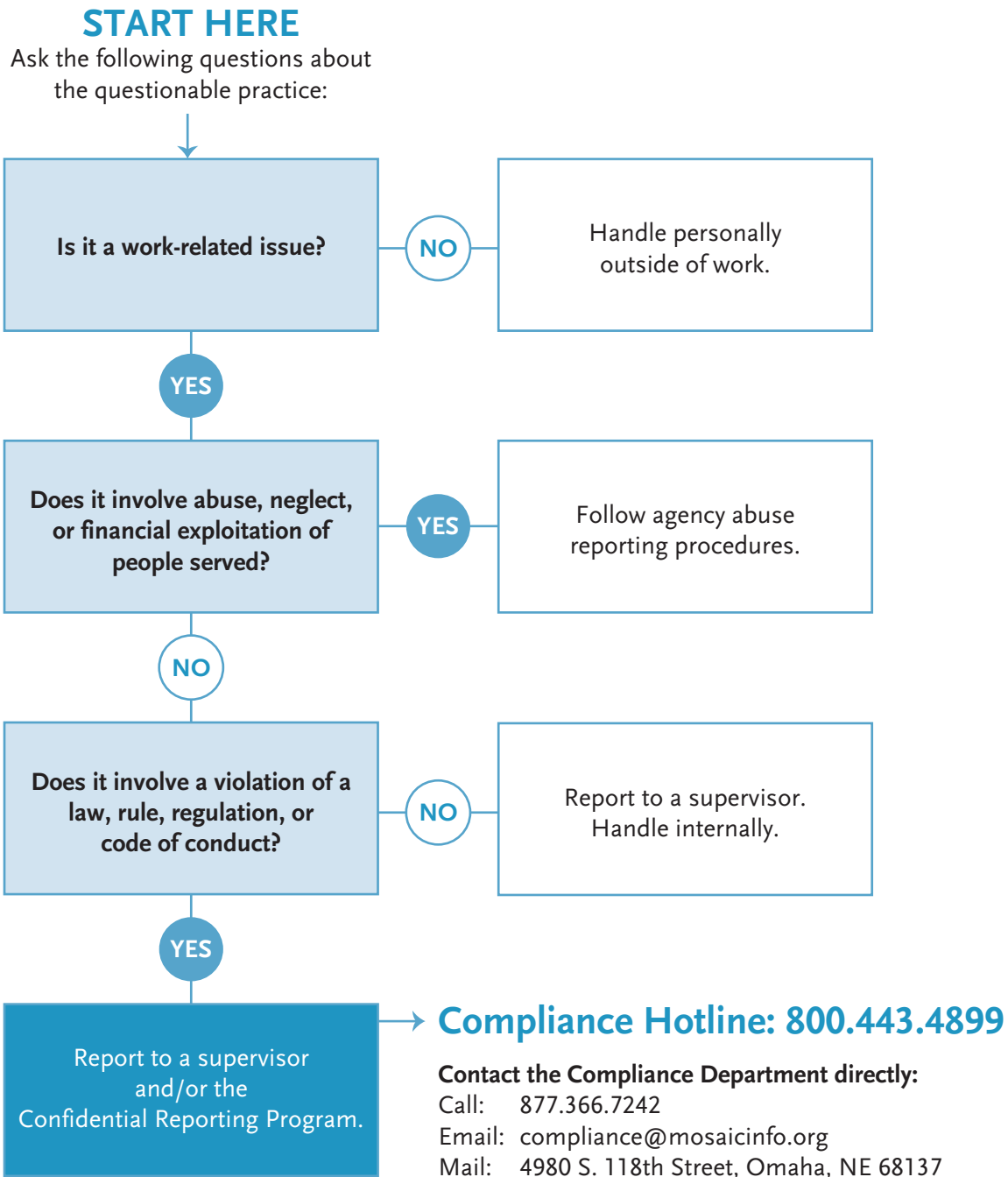
I took some photos with my cell phone of several people we support with staff at the zoo. We had a great time. Can I post them on my Facebook page for my friends to see?

No, social media sites are subject to the same HIPAA guidelines as any Mosaic publication. No employee has the authorization to release photos of or information about people Mosaic supports without a signed, specific release for the information being shared. Photos qualify as health information because they identify that someone receives services from Mosaic, a healthcare organization.

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Confidential Reporting Program Decision Tree





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