

Pyramid Healthcare, Inc.®

Helping people reclaim their health and well-being.

Corporate Compliance Plan

Chief Compliance Officer

Amy Buehrer 814-329-4237

Confidential Corporate Compliance Hotline

1-412-589-1297

Created: April 18, 2011

Revised: 7/2015, 10/2017

Reviewed and Board Approved: 7/2012, 6/2013, 6/2014, 7/2015, 7/2016

Table of Contents

| | |
|---------------------------------------|---|
| Core Values and Mission Statement | 3 |
| Compliance Policy Statement | 3 |
| Purpose | 3 |
| Scope of Program | 4 |
| Components of Compliance Program | 4 |
| Professional Code of Conduct | 4 |
| Chief Compliance Officer | 5 |
| Corporate Compliance Committee | 6 |
| Education and Training Development | 6 |
| Monitoring and Auditing | 7 |
| Investigation and Reporting | 7 |
| Sanction and Disciplinary Enforcement | 8 |
| Ethical Compliance Handbook | 8 |
| Hot Line Process and Maintenance | 8 |

Our Core Values

Integrity: Every behavior with others is always honest, transparent, and ethical

Dedication: Unwavering commitment to the Pyramid Healthcare mission: to always provide exceptional care and support to those we serve

Collaboration: Steadfast, team-focused approach; working together to achieve excellence

Passion: Genuine, compelling, and relentless desire to improve

Mission

To develop and maintain a team of committed professionals, passionate about identifying human service needs and creating solutions for individuals and families that results in positive growth and a better quality of life.

Compliance Policy Statement

Pyramid Healthcare, Inc., its affiliates and subsidiaries (“Pyramid”) are dedicated to conducting business honestly and ethically wherever Pyramid operates. Our Code of Conduct serves as the foundation for our Compliance Program. Compliance is defined as ensuring the promotion of all requirements that govern our organization as well as the prevention and detection of accidental and intentional noncompliance with all applicable legal and ethical responsibilities. Furthermore, we are committed to promoting an environment of compliance that extends beyond our employees to include network providers, subcontractors, consultants, and anyone acting on the behalf of Pyramid Healthcare, Inc.

Purpose of Compliance Program

Pyramid Healthcare’s Corporate Compliance program was created to ensure that our organization:

- Follows all standards and regulations that are defined by federal, state, and local laws as well as regulations that are applicable to our programs
- Prevents, detects, and reports all known or suspected fraud, waste, and abuse as well as other forms of professional misconduct that might lead to criminal or civil liability
- Utilizes internal self-monitoring and auditing to regulate compliance
- Establishes and maintains the highest professional and ethical standards

Scope of Compliance Program

The Corporate Compliance Program applies to all staff, including employees, officers and directors and all independent contractors and agents who provide services on behalf of or to the organization.

Components of Compliance Program

The development and implementation of Pyramid Healthcare's Corporate Compliance Program will include the following components:

- Professional Code of Conduct
- Chief Compliance Officer
- Corporate Compliance Committee
- Education and Training Development
- Monitoring and Auditing
- Investigation and Reporting
- Sanction and Disciplinary Enforcement
- Ethical Compliance Handbook
- Hot Line Process and Maintenance

Professional Code of Conduct

Pyramid Healthcare's Professional Code of Conduct supplies a guide of standards for all of the organization's actions and decisions. It is the obligation of each employee, contractor, or agent of Pyramid Healthcare to adhere to all prescribed principles in all of the daily interactions and duties. These standards include but are not limited to:

- Incorporate and comply with all applicable laws and regulations
 - Employees of Pyramid Healthcare have an obligation to be honest in all dealings with individuals receiving services, families, referral sources, vendors, and third parties.
 - Employees must comply with all laws, policies, and procedures that apply to their respective position.
 - Claims of ignorance, good intentions, or using poor judgment will not be accepted as an excuse for noncompliance.
 - Questions regarding noncompliance as a result of actions by a Pyramid Healthcare employee should be referred immediately to a supervisor, the Chief Compliance Officer, or the compliance hotline.
 - Maintain a clear understanding of the Compliance Program's purpose and elements.
- At all times, uphold the highest of ethical standards
 - All Pyramid employees will conduct themselves in accordance with the highest ethical standards of their respective professions as well as company policy standards for ethical behavior.

- Employees are expected to conduct themselves at all times in a manner that upholds the reputation, mission, values, and standing of the organization.
- Pyramid Healthcare is committed to maintaining an environment that respects all individuals with dignity. Discrimination will not be tolerated in any form.
- Avoid conflicts of interest
 - Conflict of interest occurs when individuals have a financial or other interest that could influence the judgment or action taken on behalf of Pyramid Healthcare.
 - Employees must disclose possible conflicts of interest involving themselves or their immediate families (spouse, parents, brothers, sisters, and children) to their supervisor or Program Director.
- Endeavor to attain the highest standards of care for all individuals receiving services
 - Pyramid Healthcare employees to support the organization’s mission statement at all times by providing the highest quality of care as a response to the needs of the individuals we serve, their families, and community.
 - Services prescribed and delivered must be reasonable and necessary to the care of the individual.
 - Services should always be provided by employees that are appropriately qualified and/or credentialed.
- Maintain Confidentiality of individuals served as well as information and documents
 - Access to medically and clinically sensitive information is confidential and protected.
 - All applicable confidentiality laws and regulations including (HIPAA) are followed to avoid inappropriate or unauthorized release of confidential information.
- Uphold a standard of integrity for services and payment
 - Pyramid Healthcare ensures all requests for payment are:
 - Reasonable, necessary, and appropriate
 - Provided by employees that are properly qualified for the service billed.
 - Claims are for the correct monetary amount and include appropriate documentation
 - Prevention, detention, and reporting of all known or possible incidents of fraud, waste, or abuse is mandatory.

Chief Compliance Officer

The corporate compliance program is directed by the Chief Compliance Officer. The compliance officer will report directly to the CEO as well as distribute information to the senior management team. Duties of the Chief Compliance Officer will include:

- Overseeing and monitoring the implementation of the compliance program
- Direct monitoring of current tools to track compliance as well as implementations of new tools as needed.
- Reporting on a regular basis to the senior management team and Board of Directors on the progress of implementation, and assisting these components in establishing

methods to improve efficiency and quality of services, and to reduce the vulnerability to fraud, abuse, and waste

- Periodically revising the program in light of changes in the needs of the organization, and in the law and policies and procedures of government and private payer health plans
- Overseeing the development of a multi-faceted educational and training program that focuses on the elements of the compliance program, and seeks to ensure that all appropriate employees and management are knowledgeable of, and comply with, pertinent federal and state standards
- Coordinating internal compliance review and monitoring activities, including periodic reviews of all facilities including conducting internal monitoring and auditing.
- Responding to government investigations, payer audits, and queries as the principal point of contact.
- Enforcing standards through well publicized disciplinary guidelines and developing policies addressing dealings with sanctioned individuals.
- Responding promptly to detected offenses, developing corrective action, and reporting findings to the government via established channels.

Pyramid Healthcare understands that direct and open access to the compliance officer is crucial to the success of the compliance program. Employees are strongly encouraged to contact the compliance officer with any possible concerns regarding compliance. Confidential reporting can be done through the Hotline at any time. Employees reporting compliance issues in good faith will not be subjected to retaliation or harassment.

Corporate Compliance Committee

Facilitated by the Chief Compliance Officer, the Corporate Compliance Committee is comprised of the CEO, Compliance Leads from each company, VP of Human Resources, and the CFO. This Committee advises the Chief Compliance Officer and aids in the creation, implementation, and monitoring of the Corporate Compliance Program. Other duties include:

- Monitoring reports created by the Chief Compliance Officer to identify issues, trends and patterns including Hotline calls.
- Develop annual risk analysis work plan.
- Evaluating investigative methods, follow up, and resolution of all compliance issues
- Monitor for changes in the behavioral health care environment: laws, standards, and regulations.
- Identify and implement needed revisions to policies and procedures.

Education and Training Development

Implementation and maintenance of the compliance plan requires initial and ongoing training that includes:

- All pyramid Healthcare employees as applicable, will be initially trained on the components of the compliance plan as well as the importance of the professional code

of conduct. This training, facilitated by the corporate clinical trainer will identify the strict need for compliance with all laws, regulations, and policies. An understanding of disciplinary action for failure to comply with compliance will be established.

- All new employees will receive compliance plan training as a part of their orientation process, including information regarding open access to the Chief Compliance Officer and the Hotline.
- Training on compliance will be completed yearly for all employees and contracted individuals as part of Employment reorientation.
- Attendance at all training programs will be monitored and evaluations will be completed. Failure to complete compliance training will result in disciplinary action.
- Each employee will receive a copy of the Ethical Handbook (described on page 8) during the orientation process.

Monitoring and Auditing

An essential and primary responsibility of the compliance officer is to oversee the monitoring and implementation of the compliance plan. Progress reports created from monitoring are distributed to the CEO, Board of Directors, senior management team, and the compliance committee for review. When a compliance issue is identified, a corrective plan of action will be created to define specific goals and objectives, including target completion dates and who is responsible to complete. Monitoring will include:

- Development of a working document that identifies all legal and regulatory standards according to service provided.
- Creation of a standardized monitoring tool for clinical and financial services.
- Compliance audits will focus on the implementation of all legal and regulatory standards and identify areas of potential risk.
- Baseline performance will be established and action plans will be developed at a facility level to address any areas that appear noncompliant.
- Benchmarking will be established to provide guidance with performance improvement.
- Periodic reviews will be conducted to ensure open communication to and from the Chief Compliance Officer is effective and the hotline remains available to all employees.
- Subsequent reviews will be conducted to identify that action plans have been executed.

Investigation and Reporting

Chief Compliance Officer has the authority to investigate any potential compliance issue at any time. The compliance officer or delegate as appropriate will:

- Promptly initiate investigations of all potential noncompliance issues. These will be identified and reviewed on a case by case basis.
- Investigate all reports of potential fraud and abuse. Findings of these investigations will be shared with the Compliance Committee, CEO, and Board of Directors. When fraud or waste is identified, the appropriate external agencies will be promptly contacted including regulatory bodies, funding sources, and referral sources.

- Findings from investigations conducted by external sources will be reported to the Compliance Officer, CEO, Board of Directors, and the Compliance Committee. Legal counsel will be included as deemed necessary.
- A report will be generated for all internal investigation of fraud and abuse which will include identification of the issue, a description of the investigation process, a log of witnesses, interviews, and documentation reviewed, and the results of the investigation.

Sanction and Disciplinary Enforcement

Corrective action for employee noncompliance will be initiated by the appropriate management in coordination with the Human Resources department in accordance with current disciplinary policies and procedures. Enforcement will be monitored by the Chief Compliance Officer in conjunction with the appropriate senior management member. Disciplinary action will be determined on a case by case basis and executed appropriately, equitably, and consistently, given the underlying facts and degree of severity.

Ethical Compliance Handbook

Pyramid has created a handbook with principles and rules to be followed by all employees and other individuals/agencies who work with Pyramid. The handbook will serve to familiarize new employees with the ethical standards and laws that guide our business and patient relationships in our highly regulated environment. It includes:

- Ethical Responsibilities for all Pyramid Healthcare Employees
- Commitment to an ethical workplace
- Admission and treatment
- Referrals and billing
- Conflict of Interest
- IT concerns
- Government Contracting/ Public officials
- Equal employment
- Document retention
- Governmental investigations
- Non-retaliation
- Federal and State Laws
- Helpline Information

Hotline Process and Maintenance

In order to provide employees with every avenue possible in which to raise their concerns, Pyramid has a Confidential Compliance Helpline for Pyramid employees (1-412-589-1297)

A Compliance Administrator, other than the compliance officer, operates the Helpline and each call will be treated confidentially. All calls will be investigated and reported back to the Chief Compliance Officer, CEO, and Board of Directors. Periodic monitoring will be done of the Hotline system to ensure it is accessible and effective. Pyramid Healthcare absolutely prohibits any employee from taking retribution against a Helpline caller.