



# CODE OF CONDUCT

*Updated December 2025*

## **WELCOME TO NORTH AMERICAN MENTAL HEALTH SERVICES**

NAMHS is committed to conducting its business in a manner that facilitates quality, efficiency, honesty, integrity, confidentiality, respect, and full compliance with applicable laws and regulations. To achieve this goal, NAMHS recognizes that it must require its staff to maintain a standard of behavior that is both lawful and ethical.



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# GENERAL PRINCIPLES

## NAMHS MISSION STATEMENT

NAMHS is California's largest provider of mental health services, advocating compassionate, competent care to our community, while serving diverse populations, using our unique talents to create balanced wellness and purposeful living. We are changing lives to change the future!

## 10 CORE COMMITMENTS

**1 FOLLOW-UP**  
Commit to go one step beyond in every interaction

**2 FOLLOW-THROUGH**  
Keep your promises & make good on your word

**3 ASK FOR THE BUSINESS**  
Discover opportunity & share the value of NAMHS

**4 BE PLEASANT & PROFESSIONAL**  
We are Ambassadors of NAMHS at all times

**5 ASK FOR REFERRALS**  
Ask "fans" of NAMHS to promote us

**6 COMMUNICATE APPROPRIATELY**  
In-person, phone, email, texts

**7 ADD VALUE**  
Make meaningful contributions with high standards

**8 USE OUR RESOURCES**  
& apply what you have learned

**9 TAKE ACTION NOW**  
to delay can mean losing

**10 LISTEN MORE**  
to get to the core of everything



# GENERAL PRINCIPLES

All employees and all persons associated with NAMHS, including its Executive Leadership Team, consultants, vendors, and subcontractors, are responsible for acting in a manner consistent with the code of conduct summarized in the following general principles:

## RESPECT OF DIGNITY & AUTONOMY

We treat all clients and staff with respect and value their individual choices.

## STANDARD PERFORMANCE

We will strive to achieve a uniform standard of performance throughout the organization.

## HONESTY & INTEGRITY

We will expect that all employees and persons associated with NAMHS will perform their jobs with honesty and integrity.

## EVIDENCE-BASED PRACTICE

We use the latest research and best practices to guide our work.

## ACCURATE REPRESENTATION

We will consistently & accurately represent ourselves and our capabilities to patients. We will not misrepresent our capabilities to the public or the Medicaid/Medicare program.

## CULTURAL COMPETENCE

We are aware of and respectful of the different cultural backgrounds of our clients and staff, and we strive to provide care that is culturally appropriate and accessible.

## MEANINGFUL RESPONSE

We will strive to respond in a meaningful way to the concerns of members.

## SOCIAL JUSTICE

We are committed to working to address the root causes of mental illness and to promote access to quality mental health care for all people, regardless of their income, race, ethnicity, gender, sexual orientation, or other factors.



# SPECIFIC PROVISIONS

In addition to the general principles set forth above, NAMHS employees and all persons associated with NAMHS are also expected to comply with the following specific provisions:

## PROFESSIONAL CONDUCT

**All mental health professionals at North American Mental Health Services must:**

- Always conduct themselves in a professional and ethical manner. We must be honest, respectful, and fair in our dealings with clients, staff, and the public.
- Maintain appropriate boundaries with their clients and staff. We avoid any dual relationships or conflicts of interest that could compromise our ability to provide objective and unbiased care.
- Respect the confidentiality of their clients' and staff's information, except as required by law. We only share client and staff information with others when we have permission to do so and when it is necessary to provide care or to protect the safety of the client, staff, or others.
- Obtain informed consent from their clients for all treatment decisions. We provide our clients with all the information they need to make informed decisions about their care.
- Avoid dual relationships with their clients and staff. We do not engage in any personal or romantic relationships with our clients or staff.
- Be aware of their own biases and how they may impact their work with their clients and staff. We all have biases, but it is important to be aware of them so that we can avoid letting them influence our work.
- Stay up-to-date on the latest research and best practices in mental health care. We continue to learn and grow throughout our careers.

## ORGANIZATIONAL CONDUCT

### North American Mental Health Services must:

- Provide a safe and supportive environment for its clients and staff. This means that we create a space where everyone feels safe and respected.
- Promote cultural diversity and inclusion in its workforce and in its services. We believe that diversity and inclusion are essential to providing high-quality care.
- Provide culturally competent care to its clients and staff. We are aware of and respectful of the different cultural backgrounds of our clients and staff, and we strive to provide care that is culturally appropriate and accessible.
- Engage in evidence-based practice. We use the latest research and best practices to guide our work.
- Be transparent and accountable to its clients, staff, and the public. We are committed to being open and honest about our work, and we are accountable to the people we serve.
- Comply with all applicable federal and state laws and regulations. We are committed to following all applicable laws and regulations.



### DIVERSITY

is defined as the range of human differences, including but not limited to race, ethnicity, gender, gender identity, sexual orientation, age, social class, physical ability or attributes, religious or ethical values system, national origin, and political beliefs.

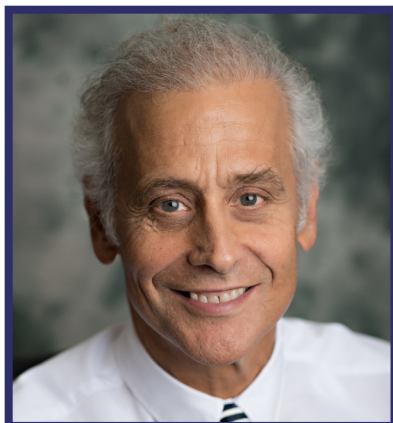


# SPECIFIC PROVISIONS

## TREATMENT OF STAFF

### North American Mental Health Services must:

- Treat its staff with dignity and respect. We believe that our staff are our most valuable asset, and we are committed to treating them with the respect and dignity they deserve.
- Provide its staff with a safe and healthy work environment. We are committed to creating a workplace that is safe and healthy for all of our staff.
- Compensate its staff fairly and equitably. We believe that our staff should be compensated fairly for their work.
- Provide its staff with opportunities for professional development. We are committed to helping our staff grow and develop in their careers.
- Prohibit discrimination and harassment of its staff. We believe that everyone has the right to work in a discrimination-free and harassment-free environment.



Our commitment is embodied in our belief that compassion and competence leads to quality care.

**Thomas Andrews**  
*CEO/ Co-Owner*

At NAMHS we believe that a great provider starts with great training and mentorship.

**Benton Kinney**  
*CFO/Co-Owner*



## FEDERAL/STATE INSURANCE PROGRAMS

### North American Mental Health Services must:

- Comply with all applicable federal and state insurance laws and regulations. We are committed to following all applicable laws and regulations regarding insurance.
- Bill for services accurately and appropriately. We only bill for services that were actually provided, and we bill at the correct rate.
- Provide its clients with information about their insurance benefits and coverage. We help our clients understand their insurance benefits and coverage so that they can make informed decisions about their care.
- NAMHS does not retain Medicaid/Medicare funds that are not properly owed to NAMHS. NAMHS also does not engage in transactions that provide excessive economic benefit to persons with a vested interest in NAMHS (e.g. patients, directors, officers). All financial reports, accounting records, research reports; expense accounts, time sheets and other financial documents shall accurately represent performance of operations.

## SCENARIO

### SITUATION

Your coworker tells you that their license has lapsed but says that they won't bring it up because they are going to get it done soon and need the money.

### SOLUTION

Working without a valid license affects patient care and puts the employee at risk for disciplinary action. Let your Facility Compliance Leader, Human Resources Director, or direct supervisor know. If you would prefer to make the report anonymously through compliance email, fax, phone, or drop box.





# SPECIFIC PROVISIONS

## **PATIENT SERVICES & RIGHTS**

NAMHS requires its employees, subcontractors, and vendors to treat patients in a manner that reflects their rights under the Medicaid/Medicare program. These rights include the right to be treated with respect for their dignity and privacy, the right to choose their provider, the right to receive culturally appropriate and competent services, the right to file a grievance, and the right to have their medical records kept confidential.

## **PROVIDER/VENDOR RELATIONS & CONTRACTS**

NAMHS does not enter into contracts or other arrangements with providers that violate the Stark Law. The Stark Law is a federal law that prohibits healthcare providers from entering into financial arrangements that could influence their clinical judgment. This includes arrangements that pay or give anything of value to a provider in return for referrals of patients.

Specifically, NAMHS does not enter into contracts or other arrangements with providers that:

- Pay or offer to pay anything of value, be it money, gifts, space, equipment or services, in return for the referral of NAMHS members for services paid by the Medicaid/Medicare program or by any other federal health care program
- Base compensation on the volume of Medicaid services provided.

NAMHS takes compliance with the Stark Law very seriously. We conduct regular training for employees on the Stark Law, have a written Stark Law compliance policy in place, and require all financial arrangements with providers to be reviewed by legal counsel. We also monitor all financial arrangements to ensure that they comply with the Stark Law.

## REPORTING OF VIOLATIONS

Any employee or other person associated with NAMHS who has knowledge of any violation of this Code of Conduct is required to report such violations to the Compliance Officer. Reports of violations may be made anonymously.

## REMEDIES FOR VIOLATIONS

Any employee or other person associated with NAMHS who violates this Code of Conduct may be subject to disciplinary action, up to and including termination of employment.

## ENFORCEMENT

The Compliance Officer is responsible for enforcing this Code of Conduct. The Compliance Officer may investigate any suspected violation of this Code of Conduct and take appropriate disciplinary action.



## SCENARIO

### SITUATION

You suspect that a coworker is under the influence of alcohol or drugs. (or in violation of any other policy/procedure) What should you do?

### SOLUTION

Any violation made should be reported to either your direct supervisor, the HR director, or the Compliance Officer. If you would prefer to make the report anonymously through compliance email, fax, phone, or drop box.



# SPECIFIC PROVISIONS

## TRAINING

All employees and all people associated with NAMHS will be trained on this Code of Conduct. This training will be conducted at least annually.

## CONFIDENTIALITY

All reports of violations of this Code of Conduct will be kept confidential to the extent possible. However, the Compliance Officer may disclose information about a violation if necessary to investigate the violation or to take appropriate disciplinary action.

## AMENDMENTS

This Code of Conduct may be amended by the Executive Leadership Team of NAMHS. In the event of an amendment, a new revision will be released and disseminated to employees, subcontractors, and vendors.

- ***The current version of the Code of Conduct is dated December 2025.***

## GIFTS

To guard against any conflicts of interest, NAMHS requests all Executive Leaders and Directors to complete a conflict-of-interest disclosure statement on an annual basis.

NAMHS prohibits the solicitation or acceptance of gifts, gratuities, favors or other benefits from persons or entities that do business with NAMHS. Notwithstanding the foregoing, acceptance of common business hospitality, such as occasional meals, entertainment, or nominal gifts with a value of \$100.00 or less, are not considered a violation of this paragraph.

## SCENARIO

### SITUATION

We've had the same vendor for about five years now. The rep offered me playoff tickets because we are such a good customer. Can I accept them?

### SOLUTION

No, you must only give or receive gifts or entertainment of nominal value on an infrequent basis. The cost of playoff tickets would be well beyond nominal. Check with the Facility Compliance Officer if you are uncertain.



## FINANCE ETHICS

NAMHS requires all employees to comply with campaign finance and ethics laws. No employee may use NAMHS's funds to make any contribution to any political candidate, or political organization except as allowed under federal law.



# CODE OF ETHICS

## COMPETITION ETHICS

NAMHS avoids any activities that unfairly or illegally reduce or eliminate competition, control prices, allocate markets or exclude competitors. To this end;

- NAMHS does not enter into agreements with other Behavior Health Specialists to unduly influence prices, charges, profits and service or supplier selection.
- NAMHS negotiates contracts with competitors, potential competitors, contractors, or suppliers on a competitive basis based upon such factors as price, quality, and service; and
- NAMHS employees who attend association or professional association meetings, or who otherwise encounter competitors, avoid discussions at those meetings regarding pricing or any other topic which could be interpreted as collusion between competitors.

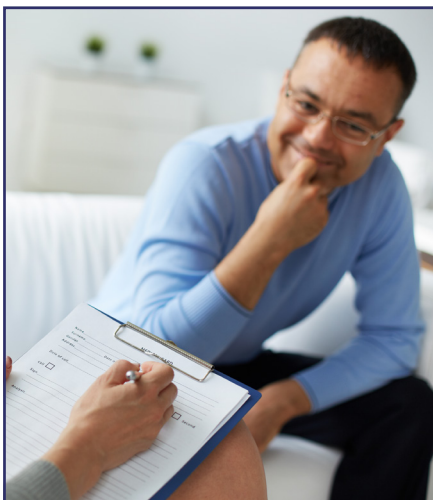
|                 |   |
|-----------------|---|
| <b>SCENARIO</b> | <b>SITUATION</b><br>You are a clinician at a behavioral health clinic. During a professional association meeting, a fellow clinician from a competing clinic approaches you and starts discussing pricing strategies and gaining a competitive edge. How would you respond?   |
|                 | <b>SOLUTION</b><br>As a clinician, it's important to uphold fair competition. In this scenario, I would politely redirect the conversation away from pricing strategies and competition, emphasizing the importance of ethical practices and fostering collaboration and professional growth in the field of behavioral health. |

## COMMUNICATION ETHICS

No employee or person associated with NAMHS prevents or delays the communication of information or records related to violation of the Plan to the Code of Ethics.

## HIPAA COMPLIANCE & ETHICS

- NAMHS maintains all medical records which are forwarded for review in a confidential manner, with access to medical records limited to those employees involved in claims adjudication, quality improvement or medical management.
- NAMHS has written contracts with all business associates (as that term is defined in the HIPAA privacy regulations) to ensure that all entities performing services on behalf of NAMHS comply with the HIPAA privacy regulations.
- NAMHS retains records in accordance with a written policy which incorporates Medicare, Medicaid and all federal, state and local regulatory guidelines.
- NAMHS shall respond appropriately to government subpoenas. If NAMHS has reason to believe that there is an impending government investigation, it retains all documents that may pertain to that investigation.



### HIPAA VIOLATION

Failure to comply with HIPAA can also result in civil and criminal penalties. If a complaint describes an action that could be a violation of the criminal provision of HIPAA, OCR may refer the complaint to the Department of Justice (DOJ) for investigation. The minimum fine for criminal violations of HIPAA is **\$50,000**. The maximum criminal penalty for a HIPAA violation by an individual is **\$250,000**.

## PATIENT CLAIMS

- NAMHS monitors the claims submitted by plan providers, to ensure honest, fair and accurate claim practices. All persons providing claims functions on behalf of NAMHS, are required to demonstrate experience and knowledge in performing such functions in accordance with federal, state and local law.
- NAMHS monitors and periodically audits the claims process to ensure honest, fair and accurate claims processes.
- NAMHS reviews the written billing policies and procedures manuals of Plan Providers to ensure that the manuals properly reflect NAMHS's policies and the requirements of the Medicaid/Medicare program.
- NAMHS sends denial letters and provides reconsideration and appeal of denials in accordance with applicable state law.

## DISCRIMINATION

- NAMHS encourages all employees and contractors to respect the rights and cultural differences of other individuals.
- NAMHS does not discriminate on the basis of race, ethnicity, gender, religion, sexual orientation, or any other protected characteristic.



### TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

Title VII of the Civil Rights Act, as amended, protects employees and job applicants from employment discrimination based on race, color, religion, sex and national origin.



# COMPLIANCE CONTACTS

## **FOR QUESTIONS, CONCERNS OR COMMENTS REGARDING COMPLIANCE:**

**Compliance Direct Line:** 530-232-5770

**Compliance Fax:** 530-338-3356

**Email:** [compliance@namhs.com](mailto:compliance@namhs.com)