

Compliance and Ethics

The Pathways Compliance Plan documents Pathways' approach to assuring that federal and state regulatory and contractual obligations related to compliance of the Community Mental Health Services Program (CMHSP) are fulfilled. It addressed Pathways regulatory compliance obligations as a CMHSP.

Pathways pledges to comply with applicable laws, promote quality performance throughout our programs, and maintain a working environment that promotes honesty, integrity and high ethical standards.

The Compliance Program is an essential part of Pathways' mission and incorporates the seven elements of an effective compliance program.

All Pathways Personnel and Contract Providers are expected to report any activity he or she reasonably believes is in violation of the law, ethical standards or Pathways policies. An individual need not be certain that the violation has occurred in order to report it. Reporting enables the Compliance Manager to ensure potential problems are investigated quickly and to take prompt action to resolve them.

Under no circumstances is retaliation for submitting a compliance issue or inquiry acceptable. Any covered party reporting suspected fraud, waste, or abuse is protected under the Whistleblowers' Protection Act 469 of 1980. All reports of wrongdoing will be evaluated promptly, thoroughly, and fairly by persons having sufficient level of expertise and knowledge with regard to the issue presented by the reporter.

Reports may be made directly to Pathways Compliance Manager by:

- a) Calling: 1-906-233-1217 (voice messages are confidential)
- b) Faxing: 1-906-233-1380 (faxes are confidential)
- c) Emailing to: jlippens@up-pathways.org
- d) Mailing to: Pathways
Attn: Compliance Officer
2500 7th Avenue South, Suite 100
Escanaba, MI 49829
- e) Calling: NorthCare's Compliance Manager at 1-906-226-0043

Any individual who wishes to remain anonymous may use NorthCare's confidential Compliance Helpline to report compliance-related issues or concerns via:

- a) Toll free at: 1-844-260-0003
- b) The web at: <http://www.lighthouse-services.com/northcare>
- c) Email: reports@lighthouse-services.com
- d) Fax to: 215-689-3885

All reports will be handled as confidentially as practical and/or as allowed by law.