

# **Code of Conduct**

*A Guide to Compliance and Ethics*

<b>Policy Category</b>	Code of Conduct	<b>Policy Number</b>	10.00A
<b>Date Issued</b>	5/21/2018	<b>Supersedes</b>	NA
<b>Date Revised</b>	8/15/2023		



# Table of Contents

---

- A. Overview
  - a. Solari Mission and Values
  - b. Message from CEO and President
- B. Employee Responsibilities
  - a. Employees Responsibilities
  - b. Additional Management Responsibilities
  - c. Reporting Potential / Suspected Violations
- C. Ethical Conduct
  - a. Honest Communication
  - b. Misappropriation of Proprietary Information
  - c. Conflicts of Interest
  - d. Gifts, Gratuities, Entertainment, and Honoraria
  - e. Outside Business Activities
  - f. Contracting and Referrals
  - g. Services for Competitors / Suppliers
  - h. Workshop, Seminars, and Training Sessions
  - i. Gifts from Applicants and Crisis Line Callers
  - j. Business Inducements
  - k. Respect and Integrity
- D. Fiscal Responsibility
  - a. Financial Accounting and Business Records
  - b. Internal Control
  - c. Financial Reporting
  - d. Personal Use of Corporate Assets
- E. Laws and Regulations
  - a. Taxes
  - b. Legal Compliance
  - c. Private Benefits
  - d. Fraud, Abuse, and Self-Referral Statutes
  - e. Lobbying and Political Contributions
- F. Antitrust and Trade Regulations
  - a. Antitrust Rules to Live By
- G. Employment Standards
  - a. Respect in the Workplace
  - b. Health and Safety
- H. Inquiries, Reporting Violations, Investigations
- I. Conclusion
- J. Solari Hotline
- K. Acknowledgement

# Overview: Solari Mission and Values

---

## Our MISSION

Inspiring Hope

## Our VISION

Empowering transformation from HOPE to HEALTH

## Our VALUES

### **Compassion**

***Meet people with compassion***

Listen and acknowledge without judgment

Treat Others with dignity and respect

### **Effort**

***Every interaction deserves my best effort***

Embrace the “I can help you” philosophy

Take every opportunity to provide value

### **Ownership**

***I own the success of the company***

I do what it takes to find solutions

I ensure responsiveness and accuracy in my work

I do what is expected of me, and follow through

# A Message from CEO and President

---

Dear Solari Colleague:

Solari is an award-winning non-profit, providing health, human services and Hope to all we serve. Since 2007, Solari has been providing crisis call center services and in that short time, has helped thousands of individuals and families get connected to the help they need. Additionally, Solari has grown to expand services to a 24-hour peer-operated warm line, Serious Mental Illness (SMI) determinations, crisis mobile team and transportation dispatching, care coordination for children and families involved with the Department of Child Services (DCS), 2-1-1 information and referral services, operation of the Homeless Management Information System (HMIS) program, social determinants of health initiatives, COVID-19 hotline, Resilient Arizona Crisis Counseling Program, COVID-19 contact tracing, tragedy support lines and other in-kind services to the community.

To work in our industry takes a burning desire to contribute to our society in a manner far superior to simply a job, there is an emotional investment we each make that must be nurtured. This is an opportunity for Solari to demonstrate our amazing skills and talents as well as bring forward our thoughts and ideas on innovative opportunities to improve service delivery through hope, empowerment, compassion, effort and ownership.

Wherever in the company you work, your job is critical to the success of our organization and the community.

Enclosed is your personal copy of Solari's Code of Conduct. Please read this manual carefully, as it outlines Solari's values, responsibilities and ethical obligations. This manual will help you identify potential violations in industry requirements as well as guide you in ethical decision making. You will be notified of changes to the Code and will receive regular trainings to re-familiarize yourself with Solari expectations.

Sincerely,



Justin N. Chase, LMSW, MBA, FACHE  
President & CEO



# Employee Responsibilities

---

## Employee Responsibilities

Solari's success in carrying out its vision and mission is dependent on individual commitment to adhering to Solari's Code of Conduct. Every Solari employee must review and adhere to the Code of Conduct as well as:

- Adhere to Solari policies. Should a discrepancy be found between the Code of Conduct and a Solari policy, the employee shall defer to the policy and notify the Policy Committee.
- Adhere to all Solari procedures.
- Apply healthcare practices that are person and family-centered, timely, culturally relevant, and effective in reducing symptoms stemming from healthcare conditions, thus maximizing functioning and improving life.
- Deliver services with the explicit goal of assisting individuals served to achieve and maintain success in recovery, gainful employment, age-appropriate education, living in their own homes, avoiding delinquency and criminality, self-sufficiency, and meaningful community participation.
- Take responsibility for your actions and decisions.

Please complete the Code of Conduct Acknowledgment Form, located at the end of the Code of Conduct, to confirm reception and compliance with its contents. Solari will ensure employees receive necessary policies, training and other provisions to facilitate observance of the Code of Conduct.

## Additional Management Responsibilities

Not only are members of the Solari executive team committed to upholding the Solari Code of Conduct, Solari's management team is expected to be equally committed to complying with, implementing, and upholding the Code of Conduct. Members of the management team will:

- Allocate time to allow new employees to become familiar with the Code of Conduct.
- Verify new and existing employees are provided with regular trainings to comply with Code of Conduct.
- Supervise staff to incorporate adherence to Code of Conduct throughout daily tasks.
- Encourage supportive working environment where staff feel comfortable reporting suspected violations.
- Report suspected Code of Conduct violations promptly.

## **Compliance Department**

The Compliance Department reports to the Solari Board of Directors. Compliance Department staff will properly report, investigate and address all complaints, grievances, appeals (not related to SMI eligibility) and suspected or potential Code of Conduct violations. The Compliance Department, in conjunction with department leadership, will ensure adherence to applicable laws, rules, and regulations. Solari has a robust Compliance Program which consists of:

- Established processes to identify compliance risk areas
- Established processes to respond to identified risk areas
- Established processes for correcting compliance issues promptly and thoroughly by implementing recommendations via updated policies, procedures, and systems to reduce potential for reoccurrence, provides a reasonable level of resources to address identified gaps, identify and implement solutions, and re-review to ensure issue is corrected
- Provides Compliance training during New Employee Orientation
- Create and maintain an annual Compliance Plan which fully outlines the structure, scope, and goals of the Solari Compliance Program

## **Reporting Potential or Suspected Violations**

If you have questions or are aware of a violation, please speak with your supervisor. If you do not feel comfortable speaking with your supervisor and become aware of suspected violations related to your employment status or employment benefits, you may contact Human Resources. For non-employment related issues, you may also contact the Compliance Department. If you are not comfortable with either of those options, you may call the confidential Solari Hotline at 844-852-4287 or email

[Compliance@Solari-inc.org](mailto:Compliance@Solari-inc.org)

# Ethical Conduct

---

Acting with honesty and integrity is a core value at Solari. All contact between employees and individuals served remains professional and within the scope of services delivered. Our standards are consistent with applicable laws, regulations and principles for ethical delivery of healthcare services.

## **Ethical Communication**

According to the National Communication Associate, ethical communication enhances human worth and dignity by fostering truthfulness, fairness, responsibility, personal integrity and respect for self and others. Employees have an obligation to be honest in all dealings with providers, recipients, third party vendors and each other. Solari employees are expected to communicate honesty in all reporting, carrying out job responsibilities and verbal conversations.

## **Misappropriation of Proprietary Information**

Solari employees may not steal, misuse or defraud proprietary information or client information belonging to Solari or an outside individual. Employees may not copy or reproduce Solari programs or materials in violation of licensing agreements, copyright laws or trademarks. Employees must observe agency non-compete and non-solicitation arrangements.

## **Non-Solicitation**

Employees may not solicit other employees during work times, except in connection with a Solari approved or sponsored event. Employees may not distribute literature of any kind during work times, or in any work area at any time, except in connection with a Solari sponsored event. The posting of materials or electronic announcements are permitted with approval from Human Resources Department. The exceptions to this policy are charitable and community activities supported by Solari management and Solari sponsored programs related to Solari supported services.

## **Confidential Information**

Protected Health Information (PHI) is any information outlining an individual's health status, provision of health care or payment for health care that is created or collected by a covered entity and can be linked to a specific individual. Appropriate physical, administrative and technical safeguards are utilized to protect an individual's PHI. Please report any potential gaps in Solari's current safeguards. Solari provides PHI protection training to employees who must have access to PHI in order to carry out their job duties.

Solari employees may not release, transfer, provide access to, or divulge information regarding PHI to any entity outside that which holds the information. Solari employees must be mindful that the obligation to maintain privacy and confidentiality continues after the individual is no longer receiving services from Solari. Additionally sharing, utilizing, examining and analyzing PHI within the organization is limited to information necessary for you to accomplish your job duties.



## **Conflicts of Interest**

A conflict of interest is defined as having a personal, professional, or financial relationship which may interfere, or even appear to interfere, with an employee's ability to complete their job duties in an ethical and impartial manner. Solari employees must avoid romantic, personal and/or sexual relationships with recipients or individuals that the employee is aware may be served by Solari in the future.

## **Gifts, Gratuities, Entertainment, and Honoraria**

Solari strives to maintain the highest standards of ethical conduct in its dealings with its business associates, including vendors and potential vendors, funders, and business partners. Acceptance of gifts may create conflicts of interest and has the potential to influence decisions. Employees or Solari departments may never accept financial gifts or incentives from recipients or family members of recipients. Solari employees should refer to policy SOL 20.00 for guidance on accepting gifts from external entities. If at any time an employee is uncertain if a gift should be accepted, they should immediately contact the Compliance Department directly for assistance. All gifts offered by a service recipient, family member of a recipient or outside of the gift acceptance policy guidelines, even if declined, should be reported to the compliance department for review for conflict of interest within two (2) business days of the occurrence. Reports should be made to [compliance@solari-inc.org](mailto:compliance@solari-inc.org) or 844-852-4287.

## **Ethical Business Practices**

All staff will be required to complete initial and annual compliance training as a condition of employment to ensure that they are familiar with expectations of their conduct. Solari prohibits unprofessional conduct, relationships and/or contacts by its staff members with clients outside the normal course of business. Such conduct and/or extraneous relationships may impede the primary mission of the business and may reflect, in a negative way, upon its image and reputation within the community. Unprofessional conduct as defined by Solari includes, but not is limited to:

- Disclosing a professional confidence or privileged communication except as required by law or valid written release;
- Any sexual contact with a client or former client;
- Failing or refusing to maintain adequate records of behavioral health services provided to a client;
- Exploiting a client, former client, or business contact;
- Engaging in a dual relationship with a client that could impair clinical objectivity or professional judgement or create a risk of harm to the client;
- Terminating behavioral health services to a client without making an appropriate referral for continuation of care if continuing behavioral health services are indicated: and
- Use of fraud or deceit in connection with rendered services.

### **Outside Business Activities**

Employees may work for another Behavioral Health Agency while employed at Solari under the terms and conditions of the Solari Employment Agreement. However, employees may not take an ownership position with a competitor while employed at Solari.

Employees may not conduct outside work while on company time with Solari. Employees may not use company property, equipment or facilities in connection with outside work at any time.

### **Contracting and Referrals**

Solari's business dealings must not be influenced by an individual employee's personal or financial connections with contractors or collaborative partner personnel. In order to ensure Solari's performance is correctly perceived by outside observers, please disclose personal relationships with Solari's contractors and partnering mental health providers.

### **Workshop, Seminars, and Training Sessions**

Solari recognizes the value of on the job training to perform competently in their positions. The Learning and Professional Development Department and the employee's supervisor will initiate all on the job trainings. Training may include safety training, job skills training, participation in off-site training and continuing education when necessary. Employees that would like to participate in a non-required training, workshop or seminar that is held on one of their scheduled workdays should speak with their direct supervisor for approval.

### **Business Inducements**

It is the policy of Solari to not award employees with financial incentives or commission based on service utilization.

### **Respect and Integrity**

Employees and contractors are expected to be honest in all dealings with providers, recipients, third party vendors, and each other. Employees are expected to conduct themselves in a manner which reflects Solari values of compassion, effort and ownership.

# Fiscal Responsibility

---

Solari ensures that its accounting procedures are consistent and in compliance with the United States Generally Accepted Accounting Principles (US-GAAP). The Finance Department is responsible for ensuring the recordkeeping and reporting practices are meeting all applicable regulatory and industry standards.

## **Financial Accounting and Business Records**

Funds are expended only upon proper authorization of management, for valid business purposes. Disbursements are sufficiently documented, properly recorded, and processed timely in accordance with applicable regulatory and industry standards. All purchases must be necessary and reasonable and in compliance with all legal, regulatory, and contract requirements.

Each Solari employee is required to submit documents that are complete, accurate, and truthful, with proper approval, in a timely manner. Employees may not take actions to defraud or intentionally mislead an individual in order to obtain personal gain or inaccurately portray Solari's financial position. Individuals responsible for misleading or falsifying financial records will be subject to disciplinary action up to and including termination.

## **Internal Control**

Solari has adopted internal controls to provide reasonable assurance that the funds are safeguarded against waste, loss, unauthorized use or misappropriation. Internal controls are being monitored by management to ensure its effectiveness. All Solari employees are required to follow internal control procedures and report suspected breaches.

## **Financial Reporting**

Solari reports its financial information in accordance with US-GAAP and any other applicable regulatory and industry standards.

## **Care of Company Equipment**

Solari's assets and company equipment are to be properly cared for and maintained. Employees are expected to demonstrate proper care when using the company's property and equipment. Company property, except for mobile devices, may not be removed from the premises without proper written authorization from management. Employees that lose, break or damage property should immediately report the issue to their supervisor. Inappropriate use or damage of company property by an employee may result in corrective action up to and including termination of employment.

# Laws and Regulations

---

Solari obeys all industry regulations and laws.

## **Taxes**

Solari, as a registered non-profit, is dedicated to engaging in activities that further its mission, inspiring hope, for the benefit of the general public. Solari reinvests revenue generated through its activities into promoting and advancing its mission, rather than translating this income into profit for its shareholders. Non-profit corporations are exempt from the income tax requirements that affect other corporations. However, Solari must accurately file tax returns in accordance with state and federal guidelines.

## **Legal Compliance**

Solari complies with the spirit and letter of all applicable laws and regulations. Solari expects its employees to be acquainted with legal compliance standards. Solari will provide employee training regarding employee specific laws and regulations as needed.

Solari has retained its own legal counsel. When dealing with Solari auditors and attorneys, Solari employees are expected to represent themselves, their work and their professional relationships truthfully and openly.

## **Private Benefits**

Individuals within the organization may not receive excessive benefit or compensation from their employment as this arrangement would undermine Solari's mission. Violation of Internal Revenue Service laws surrounding private benefits could result in the loss of Solari's tax-exempt status or the enforcement of sanctions against Solari.

## **Fraud, Waste, and Program Abuse**

Solari defines abuse as: Provider practices that are inconsistent with sound fiscal, business or medical practices and result in an unnecessary cost to the Medicaid program, or in reimbursement for services that are not medically necessary or that fail to meet professionally recognized standards for health care. It also includes beneficiary practices that result in unnecessary cost to the Medicaid program.

Solari defines fraud as: An intentional deception or misrepresentation made by a person with the knowledge that the deception could result in some unauthorized benefit to themselves or some other person. It includes any [act](#) that constitutes [fraud](#) under applicable federal or state law.

Solari has mechanisms in place to avoid and prevent fraud and program abuse. All staff must be familiar with types of abuse, waste and fraud which can occur at Solari. Solari staff must report suspected cases of fraud or program abuse to their supervisor immediately. Solari is dedicated to detecting, reviewing, and preventing all forms of fraud, waste and programmatic abuse in order to improve Solari systems and promote accountability. Solari maintains confidential and anonymous reporting process for the public, members and employees to report fraud, waste and program abuse complaints. Additionally, Solari's Compliance Department is committed to certifying compliance with federal and state anti-kickback and whistleblower laws.

Prohibited activities:

- Intentionally reporting encounters or services that did not occur;
- Intentionally reporting overstated or up-coded levels of service;
- Purposefully altering, falsifying or destroying clinical documentation to inflate compliance rating or collect Medicaid payments not otherwise due;
- Intentionally or recklessly making false statements about credentials of persons rendering care to recipients
- Deliberately attempting to solicit kickbacks or bribes
- Intentionally failing to render medically appropriate care

# Antitrust and Trade Regulations

---

Aggressive competition gives consumers higher quality services, lower prices and more choices. According to the U.S. Department of Justice, the enforcement of these laws saves consumers millions and even billions of dollars a year. Antitrust and trade regulation laws protect the consumer, and Solari, through a competitive marketplace and from anticompetitive mergers. Solari engages in activities that promote fair competition for the benefit of consumers. Solari avoids activities that illegally reduces competition, fixes price, creates monopolies through acquisitions or allocates/ divides markets. Solari has a duty to act independently and earn its profits solely on quality of services.

Do not engage in bid rigging, in which a predetermined entity has conspired to win a bid. Do not engage in price fixing, in which businesses collude to set prices at a specific level. Do not engage in market allocation, in which competitors divide the market so that one organization holds a monopoly with a customer base, product or territory. Do not intimidate or threaten behavioral health recipients, bribe, steal or engage in unfair industry practices.

Employees must obey and comply with applicable antitrust laws and regulations. Consult the Compliance Officer in advance of any decision that may involve antitrust issues.

# Employment Standards

---

## **Respect in the Workplace**

Solari is committed to equal employment opportunities. Solari will not discriminate against employees or applicants for employment on any federal or state recognized “protected class.” Persons are recruited, hired, assigned and promoted without regard to race, religion, color, national origin, citizenship, sex, veteran status, uniform member status, age, disability or any other legally recognized protected personal characteristics. Similarly, all other personnel actions, such as compensation, benefits, transfers, layoffs, access to training, education tuition assistance are administered without regard to previously outlined protected personal characteristics.

Solari maintains a work environment free from harassment, including sexual harassment and encourages employees to report such illegal and inappropriate conduct to the leadership team. Harassment or sexual harassment in any form will not be tolerated, is against company policy and may be unlawful. Solari employees and third parties are always to be treated with respect and dignity. Harassment includes any unwelcome verbal, visual, written, or physical conduct which creates an intimidating or hostile work environment. Sexual harassment includes unsolicited and unwelcomed sexual advances, requests for sexual favors and/or other verbal or physical conduct of a sexual nature in the workplace. If you become aware of harassment, please notify your supervisor or the Human Resources Department. Incidents will be promptly investigated in accordance with Solari’s harassment policies.

## **Health and Safety**

Solari maintains a safe and healthy working environment. Employees shall notify their supervisor immediately in the event or perceived event of the workplace or workplace practices become unsafe. Employees are expected to conduct themselves in a manner which promotes health and safety standards and create a workplace that is free from drugs, narcotics and alcohol. Employees are not permitted to smoke within Solari facilities or within 20 feet from all established entrances, open areas or ventilation systems.

# Inquiries, Reporting Violations, Investigations

---

Solari has instituted the Solari Hotline, **844-852-4287**, for employee use. You may utilize this line to ask questions or report a potential or suspected Code of Conduct violations. The Hotline is accessible 24 hours a day. You may also choose to notify the Compliance Department in writing to provide information that will assist the department in initiating an investigation. The Compliance Department may be reached at [compliance@solari-inc.org](mailto:compliance@solari-inc.org). All reviews and investigations of potential or suspected violations of the Code of Conduct will be coordinated under the direction of the Compliance Officer. All reports will be reviewed and investigated quickly and thoroughly and will result in appropriate action. All reports will be treated as confidential.

Any breaches to policies, practices or standards are addressed through progressive discipline up to and including termination of employment. Policies relative to ethical standards and conduct include assurances of non-discrimination and non-retaliation toward any employee making a report or cooperating in the investigation of any alleged ethical or business compliance violation.

While employees have the option to file a report anonymously, the filer's identity may be learned through the investigation process. Investigative staff will take measures to secure the individual's identity when instituting appropriate corrective action. Solari will protect the anonymity of any person who files a report in keeping with federal and state whistleblower guidelines. Individuals who provide such information are assured protection against retaliation by Solari or its agents.



# CONCLUSION

---

The Code of Conduct outlines Solari's values, responsibilities, and ethical obligations. It provides employees with guidance in handling ethical situations in the business setting. It assists employees in identifying and fulfilling their responsibilities and educates employees in deciphering suspected violations. While comprehensive, the Code cannot account for all workplace relations and situations. Solari staff must take initiative to seek answers to any questions or concerns not covered in this manual.

# Acknowledgement

---

On this date, \_\_\_\_\_

- 1) I \_\_\_\_\_ acknowledge that I have received the Solari Standards of Conduct.
- 2) I understand my responsibilities with respect to the Code of Conduct.
- 3) I understand it is my responsibility to report any suspected or actual violations involving either myself or member of the Solari workforce specific to the conflict of interest section of the Code of Conduct
- 4) I understand the content in this manual characterizes mandatory procedures.
- 5) I agree to comply by its policies.

---

Signature

---

Position



Approval	Date
Justin N. Chase, LMSW, CPHQ, FACHE   President and CEO	