

BEHAVIORAL HEALTH NYC IPA, LLC

COMMITMENT TO COMPLIANCE

At the IPA, we strive to earn the trust of our network physicians and the respect of the communities we serve. To help us do that, we have implemented a Compliance Program and Code of Conduct.

- **Who is responsible?** All Personnel, including board members, employees, network behavioral health providers, independent contractors, and entities with which we do business.
- **What are the rules that must be followed?** The standards set forth in the Code of Conduct provide an overview of the rules that you are expected to follow. All Personnel are provided with a copy of the Code of Conduct and the Compliance Program Structure and Guidelines. We expect everyone to conduct themselves pursuant to the highest ethical, business, and legal standards. If you suspect that someone is doing anything that is illegal or unethical, you must report it.
- **Examples of what needs to be reported:**
 - Giving or accepting something of value in exchange for referrals.
 - Improper marketing practices.
 - Any activity or business practice that could possibly be interpreted as unethical or illegal.

How to Report Compliance Violations:

- Contact the Compliance Officer at (516) 695 - 3307 or by email at john.javis@bhnycipa.com.
- Submit issues or concerns anonymously via regular mail to
Behavioral Health NYC, IPA, LLC
P.O. Box 642
Selden, NY 11784
Attn: Compliance Officer.

- All reported compliance issues will be investigated.
- You may raise the issue anonymously if you wish. If you report via regular mail, your identity will be kept confidential unless the matter is turned over to law enforcement.
- Be assured that intimidation or retaliation against anyone who in good faith raises a compliance issue or otherwise participates in the IPA Compliance Program is strictly prohibited.