

What is Integrity at Mosaic?

As a recipient of federal and state health care dollars, Mosaic has established a program to promote ethical and legal behavior in accordance with its mission, values, and guiding principle. The Integrity at Mosaic (I AM) Program includes:

- A Code of Conduct, which defines the ethical and legal conduct required of employees, directors, and officers
- An Integrity Office, which implements the provisions of the Integrity Program
- A Confidential Reporting Program (CRP) for reporting known or suspected violations of laws, rules, regulations, contractual agreements, and integrity/compliance-related policies and procedures

Why is Integrity at Mosaic important to me as a contractor or vendor?

As a contractor or vendor of Mosaic, you are acting as a representative of the organization. Mosaic expects all those performing services on behalf of the organization to conduct themselves with personal and business integrity, honesty, and diligence in performing their responsibilities. This includes, but is not limited to:

- Adhering to all contractual commitments with Mosaic
- Adhering to all federal, state, and local laws relating to Mosaic's activities and services. This includes Federal and State-specific False Claims Acts and the Health Insurance Portability and Accountability Act (HIPAA)
- Adhering to all ethical standards of conduct applicable to licensed professionals
- Avoiding conflicts of interest

Under federal law, no payment will be made by any federal health care program, such as Medicare and/or Medicaid, for any items or services furnished,

ordered or prescribed by an excluded contractor or vendor. When an individual or entity is excluded from federal health care programs, it means they are essentially banned from working for any health care provider who receives federal health care funds, such as Medicare or Medicaid. Because of this, monthly exclusion checks are conducted on contractors and vendors of Mosaic using federal and state government exclusion lists. If a contractor or vendor is confirmed to be on one of these exclusion lists, their contract with Mosaic will be terminated.

What are false or fraudulent claims and what laws relate to such claims?

Medicaid funds 95 percent of the services provided by Mosaic. Because of this, Mosaic is committed to complying with all applicable federal and state laws, rules, and regulations that are put into place to prevent, detect, and report fraud, waste, and abuse in federally funded programs. Contractors and vendors of Mosaic should take all reasonable steps to prevent the submission of false or fraudulent health care claims or claims-related documentation to a federal or state governmental agency for payment. Examples of false or fraudulent claims include:

- Billing for services or products not provided
- Billing for undocumented services
- Falsifying records
- Billing at a higher level of service when a lower level of service was provided
- Assigning incorrect codes to secure higher reimbursements
- Knowingly concealing, avoiding, or decreasing an obligation to pay money to the government

The Federal False Claims Act (31 U.S.C. §3279-3733) is a federal law aimed at preventing fraud against the Federal Government. The Federal False Claims Act also includes a whistleblower provision, which states that individuals with specific knowledge of false claims submissions have the right to file a civil action and will

be protected from retaliation for doing so. Several States have also enacted their own False Claims Act requirements with whistleblower provisions.

In addition, the Program Fraud Civil Remedies Act of 1986 (31 U.S.C. Chapter 38) provides administrative remedies for anyone making false claims or written statements to any federal agency. A violation of this law occurs when a false claim is submitted, not when it is paid.

As a Mosaic contractor or vendor, you must adhere to these laws. All known or suspected filings of a false or fraudulent claim must be reported to Mosaic. If you have any questions regarding these laws, please contact Mosaic's Integrity Office.

What is HIPAA?

Mosaic maintains compliance with HIPAA federal regulations, which protect the privacy and security of individuals' personal health information. This information is called "Protected Health Information" or "PHI". If, in the course of your work, you have access to PHI or you overhear statements or become aware of confidential information regarding clients, employees or Mosaic, you may not discuss nor reveal that information to anyone other than those that have the need or right to know. If you receive or become aware of PHI or confidential information that you should not have access to in the course of your work, contact Mosaic's Integrity Office.

Some contractors or vendors may be business associates of Mosaic. A business associate is a contractor or vendor who performs functions or activities on behalf of, or provides certain services to, Mosaic that involves access by the business associate to PHI. A business associate is directly liable under HIPAA rules and a business associate must report to the CRP or Integrity Office any use or disclosure of PHI not authorized by the contract or required by law.

What is Conflict of Interest?

Contractors or vendors are required to avoid placing the organization in situations where personal interests actually or potentially conflict with the interest of Mosaic. Contractors must make Mosaic aware if they have a family member and/or significant other employed with the organization.

What is Mosaic's Vendor Relationships Policy?

Mosaic's Vendor Relationships Policy states that employees must maintain a professional, arms-length relationship with all current and/or potential contractors or vendors. This requires declining offers of gifts, gratuities, and favors from contractors or vendors with whom Mosaic does business or is considering doing business.

How do I report a violation?

As a contractor or vendor affiliated with Mosaic, you must report any conduct or activity that you believe may violate any law, regulation or contractual commitment. Failure to report non-compliant conduct or an activity that violates the Integrity at Mosaic Program may be grounds for termination of the contract.

No person who reports known or suspected violations will suffer retaliation. Discriminatory or retaliatory actions will not be tolerated by Mosaic. Any such action will be considered a violation of Mosaic's Integrity Program and should be reported immediately to Mosaic's Integrity Office.



Mosaic Mission:

Embracing God's call to serve in the world, Mosaic advocates for people with intellectual disabilities and provides opportunities for them to enjoy a full life.

Mosaic Vision:

Mosaic enters its second century as a strong organization with continued focus to effectively help people with intellectual disabilities create the life they desire. We pursue sustainable growth and ensure our mission success through a broad partnership with donors and volunteers.

I AM: Integrity at Mosaic

*It's doing the right thing,
even when no one is looking.*

Mosaic Values:

- Safety
- Connection
- Respect
- Integrity

Our Guiding Principle:

Every individual is a person of worth.

If you believe that any conduct/activity is questionable or if you have any questions regarding any of the information in this brochure, you may contact the CRP's confidential, toll-free hotline at (800) 443-4899. You may also send an email to integrity@mosaicinfo.org. Callers may remain anonymous, if desired.

Mosaic's Integrity Office
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What Every Mosaic Contractor and Vendor Needs to Know

