



Bluegrass Regional Mental Health-Mental Retardation Board, Inc.
Bluegrass Regional Psychiatric Services, Inc.
Bluegrass Oakwood, Inc.
Bluegrass New Directions, Inc.

Organizational Integrity and Compliance Plan

ORGANIZATIONAL INTEGRITY and COMPLIANCE PLAN

WHEREAS, as a tax-exempt organization that participates in the Medicare and Medicaid Program, and as an independent contractor of various other services with the Commonwealth of Kentucky and the Federal Government, providing services as a Community Mental Health Center as mandated by KRS 210.370-460, inpatient services via a management agreement with the Cabinet for Health Services effective September 1, 1995, an ICFMR facility via a management agreement with the Cabinet for Health Services effective November 1, 2006, the Bluegrass Regional Mental Health - Mental Retardation Board, Inc. and its related sub-corporations must comply with a number of federal and state laws and regulations and must adhere to the standards promulgated by various private accreditation bodies; and

WHEREAS, it is the continuing desire of the Board to provide care at a reasonable cost to all clients and to promote the mental health of people in the community served by this organization; and

WHEREAS, we recognize our responsibility to serve the Kentucky indigent population with Kentucky State General Funds, and to serve as good fiscal managers to ensure the continued growth and success of our programs through Organizational Integrity and Compliance; and

WHEREAS, the Board has determined that this organization shall not be able to provide needed services to its clients and the community if it does not comply with all applicable federal and state laws, regulations, and private accreditation body standards;

NOW THEREFORE, this Board hereby adopts the following Organizational Integrity and Compliance Plan. This plan, in conjunction with the Board's policies and procedures, outline Bluegrass' expectations for this organization and its related sub-corporations regarding compliance with all applicable state and federal laws. The plan includes written standards of conduct that promote ethical behavior as well as various policies related to financial controls to prevent, detect and remedy fraud, waste and abuse. Bluegrass encourages all employees, independent contractors, volunteers and students to be aware of the laws regarding fraud and abuse and false claims and to report issues so that Bluegrass may identify and make immediate remedies as appropriate.

SCOPE: All employees, independent contractors, volunteers and students of Bluegrass corporations and related corporations as noted on the face sheet of this plan ("Bluegrass").

PURPOSE: To establish an effective Code of Conduct that shall contribute to the fulfillment of the organization's mission while serving to increase the likelihood of early detection of any violation of relevant laws and regulations. This plan is intended to provide guidance to all employees, independent contractors, volunteers and students to ensure that their daily work is done in an ethical and legal manner. It applies to relationships with clients, affiliated professionals, third-party payers, subcontractors, independent contractors, vendors, consultants, community members at large, and one

another. In accordance with the intent of Section 6032 of the Deficit Reduction Act of 2005, this plan constitutes and incorporates Bluegrass' Code of Conduct, Conflict of Interest, and policies and procedures for detecting and preventing fraud, waste and abuse. Additional key components of the plan include training and a mechanism for employees, independent contractors, volunteers and students to report potential conflicts, unethical behavior or non-compliance with applicable laws, regulations or organizational policy, as well as a leadership team that fosters a positive and ethical culture of open communications.

Code of Conduct

The Organizational Integrity and Compliance Plan is Bluegrass' absolute commitment to high standards of ethics and compliance establishing a Code of Conduct. This commitment permeates all levels of the organization, including the Board of Directors. All Bluegrass Board members, employees, independent contractors, volunteers and students shall subscribe to Bluegrass' Code of Conduct, Ethical Principles and Ethical Standards, and Conflict of Interest standards. It is important that all employees, independent contractors, volunteers and students associated with Bluegrass (1) comply with the standards contained in the Organizational Integrity and Compliance Plan; (2) immediately report any suspected violations; and (3) assist, as needed, in investigating allegations of wrongdoing. While there shall be no retaliation allowed on those who raise issues, failure to observe the provisions of the plan and associated policies and procedures of Bluegrass can result in serious consequences to both the employee and Bluegrass in the form of termination, criminal charges and substantial monetary fines. *As an employee, independent contractor, volunteer and/or student of Bluegrass, I agree to:*

- Represent the interests of all people served by this organization and not favor special interests inside or outside the organization;
- Not use the organization or my employment with this Board for my own personal advantage or for the advantage of my friends or supporters;
- Respect the confidential nature of information associated with services and/or clients;
- Focus my efforts on the mission and goals of the organization;
- Abide by all policies and procedures approved by the President/CEO and the Board;
- Respect the individual rights of all clients.

Conflict of Interest

Employees do not advocate or recommend to the Board any service or product in which employees or their family member have a financial interest. Employees who are aware of Board contract for services or goods from businesses in which they or their family have a financial interest shall immediately inform the Board of their financial interest. All contractual agreements are reviewed for the potential of conflict of interest.

General Principles & Standards

1. It is the responsibility of every employee as a condition of employment to know about and adhere to the Organizational Integrity and Compliance Plan. All employees, independent contractors, volunteers and students must understand that it is their obligation to assure they are adequately educated to perform their jobs in full compliance with the law and organizational policies and procedures. A goal of these written standards is to prevent and detect fraud, waste and abuse in the provision of healthcare services to clients and in the payment or reimbursement of these services covered by Medicare, Medicaid, or public funds;
2. The standards of conduct described in this plan are intended to generally define the scope of conduct that employees, independent contractors, volunteers and students may encounter throughout their work day; however, not every situation can be addressed. Therefore, it is expected that all employees, independent contractors, volunteers and students shall use personal integrity, good judgment and common sense to meet the challenges of daily work by complying with all applicable federal, state, and local laws and regulations, as well as this organization's policies and procedures, including the Personnel Policies.
3. No employee, independent contractor, volunteer or student has any authority to act contrary to the provision of the law or to authorize, direct, or condone violations offered by any other employee, independent contractor, volunteer or student;
4. Any employee, independent contractor, volunteer or student of this organization who has knowledge of facts concerning this organization's activities that he or she believes might violate the law has an obligation, promptly after learning such facts, to report the matter to his or her immediate supervisor or Service Area Manager (SAM), the Chief Financial Officer (CFO), the President/Chief Executive Officer (CEO), or to the Corporate Compliance Officer (CCO). The CCO can be reached at (859) 253-1686 extension 585. Effective April 1, 2013, reports of concerns, anonymous or otherwise, may also be made by calling Bluegrass' Compliance Hotline at 1-855-727-8702. Bluegrass shall not, without just cause, discharge or in any manner discriminate or retaliate against any person who in good faith makes a report required or permitted by KRS 205.8451 to 205.8483, testifies, or is about to testify, in any proceeding with regard to any report or investigation;
5. This organization shall take steps to communicate effectively its standards and procedures to all employees, independent contractors, volunteers and students by requiring participation in training programs and/or by dissemination of publications that explain in a practical manner what is required. (*Refer to the Employee Guidance Section within this document*). Every employee, independent contractor, volunteer and student shall have access to a copy of the Organizational Integrity and Compliance Plan upon hire and shall be asked to annually attest thereafter to continued adherence of our Code of Conduct and Conflict of Interest Standards. In addition, every Bluegrass site shall have access to organizational policies and procedures relating to compliance. These are made available on SharePoint. Training and/or dissemination of information shall include detailed information about the False Claims Act (FCA), Kentucky law pertaining to criminal penalties for false claims and statements, Federal and Kentucky whistleblower protections, The Anti-Kickback Statute, The Health Insurance Portability & Accountability Act of 1996 (HIPAA), The American Recovery

and Reinvestment Act of 2009 (ARRA), The Health Information Technology for Economic & Clinical Health Act (HITECH), The Federal Deficit Reduction Act of 2005 (FDRA), and The Program Fraud Civil Remedies Act of 1986 (PFCRA);

6. This organization shall take steps to achieve compliance with its standards by utilizing monitoring and auditing systems reasonably designed to detect criminal conduct by its employees, independent contractors, volunteers, and students and by having in place and publicizing a reporting system whereby employees, independent contractors, volunteers and students, can report criminal conduct by others within the organization without fear of retribution. Reports should be made as outlined in item four above. Upon receiving a report of an alleged violation, the CCO shall initiate and coordinate a thorough investigation and may request, as appropriate, a review of the alleged violation by legal counsel and/or the internal Corporate Compliance Committee. The CCO coordinates the development of Bluegrass procedures as they relate to compliance and serves as the spokesperson for compliance matters, handling questions, suggestions, and complaints about the plan. The CCO directly reports all compliance reports and/or concerns to the Board of Directors through the Executive Committee at least quarterly, or more often if necessary. The CCO and the internal Corporate Compliance Committee work jointly on compliance initiatives, corrective actions, and recommendations for improvement in the overall compliance program;
7. When the best course of action is unclear or if any employee, independent contractor, volunteer, student or affiliate observes a violation of standards, persons are urged to seek the guidance of or report the violations as outlined in item four above. All Bluegrass employees, independent contractors, volunteers and students have the responsibility to report any actions that they believe, in good faith, may violate the standards of conduct in this plan or damage public trust. It is Bluegrass' duty to protect those who report potential incidents of malfeasance. Employees, independent contractors, volunteers and students having knowledge of retribution or retaliation due to the reporting of malfeasance should promptly report the information to the CCO;
8. Failure to observe the provisions of this plan can result in serious consequences to an employee, independent contractor, volunteer or student, up to and including termination and criminal charges, and to the organization, up to and including criminal prosecution, substantial monetary fines, and the loss of organizational integrity. This Organizational Integrity and Compliance Plan shall be consistently enforced through appropriate disciplinary mechanisms, including, as appropriate, discipline of individuals who have knowledge of an offense and ignore it or otherwise fail to report it, as well as those individuals who actually committed or conducted an offense. Discipline shall adhere to the policies set forth in Bluegrass' official Personnel Policies and shall be case-specific; and
9. After an offense has been detected, this organization shall take all reasonable steps to respond appropriately to the offense and to prevent further similar offenses, including any necessary modifications to its program to prevent and detect violations of law and to make reimbursements as appropriate. As an organization, Bluegrass' accountability is then evidenced by:
 - Investigating and remedying identified systemic problems;

- Taking disciplinary action against employees, independent contractors, volunteers and students who have violated internal compliance procedures or applicable laws or who have engaged in wrongdoing; and
- Promoting and adhering to compliance as an element in evaluating all staff.

Corporate Commitments

This organization is a tax-exempt organization that is organized for the promotion of good mental health serving substance abusers and the intellectually and developmentally disabled who reside in its service area. In order to further its tax-exempt purposes, this organization, its Board, employees, independent contractors, volunteers, and students hereby express the following commitments:

1. To the community, this organization is committed to the promotion of good mental health serving substance abusers and the intellectually and developmentally disabled, and to using this organization's best efforts to satisfy the mental health needs of these individuals in the communities served while operating this organization in a fiscally responsible manner;
2. To its employees, independent contractors, volunteers, and students this organization shall implement and maintain employment practices and programs that comply with all applicable federal and state laws;
3. To its clients, this organization is committed to providing the highest quality of care, consistent with this organization's facilities and resources, which is responsive to client needs and complies with government laws and resources that govern the operation of a tax-exempt organization. This organization is also committed to maintaining accreditation by the Joint Commission and/or other such accreditation bodies as this organization may determine appropriate;
4. To third-party payers, both private and public, this organization is committed to submitting bills for services in a timely and accurate fashion and reporting all reimbursable costs to the Medicare and Medicaid program and to any other third party in a legally appropriate manner. Staff with administrative and/or clinical supervisory responsibilities are committed to ensuring case load numbers are appropriate and that only those services which are medically necessary are provided;
5. To its suppliers, this organization stresses a sense of responsibility that enables it to be a good customer. When this organization determines that it is in its best interest, or that it is dictated by the paying source, to utilize a competitive bidding process, this organization is committed to a fair and equitable bidding process; and
6. To all who do business with this organization, this organization shall conduct its business in a manner that is consistent with this organization's tax-exempt status and all other applicable laws and regulations.

Special Considerations/Tax Status

1. This organization is a not-for-profit entity that is exempt from federal taxation pursuant to section 501(c) (3) of the Internal Revenue Code. That tax-exempt status could be jeopardized if any of the tax-exempt benefits enjoyed by the organization inure to the benefit of certain private individuals. All board members, employees, independent

- contractors, volunteers, and students who associate with this organization must do so in a manner that is consistent with this organization's tax-exempt status;
2. This organization is exempt from federal taxation, in part, because it participates in the Medicare and Medicaid program and it operates an emergency crisis-line that is available 24 hours per day. The Internal Revenue Service (IRS) has stated that this organization's federal tax-exempt status might be jeopardized if this organization is excluded from participation in the Medicare and Medicaid program or is found to have not provided emergency treatment that is consistent with the Emergency Medical Treatment and Active Labor Act (EMTALA). Violations by employees, independent contractors, volunteers or students of any law or regulation governing the Medicare and Medicaid program, or the anti-referral provisions of any state or federal law (The Medicare and Medicaid Patient Protection Act of 1987, known as the "Anti-kickback Statute"), shall not be tolerated. In addition to the loss of federal tax exemption, violations of these laws might subject this organization and the employee or persons involved to criminal prosecution and significant civil penalties. All new employees, independent contractors, volunteers and students are made aware of Bluegrass' Organizational Integrity and Compliance Plan which specifically includes proper Code of Conduct expectations and Conflicts of Interest guidelines upon hire and annually thereafter. Supervisors are to monitor whether employees or others under their direction receive adequate education of how these laws and regulations affect the employee's or others' duties and make each employee or other aware of this policy and his or her duty to report any suspected violations;
 3. Political contributions and activities might also jeopardize this organization's federal tax-exempt status. No funds or assets, including the work time of any employee, independent contractor, volunteer or student shall be contributed, loaned, or made available directly or indirectly to any political party or to the campaign of any candidate for federal, state, or local office. Any involvement and participation in a political campaign by employees, independent contractors, volunteers or students must be made clear that comments or statements made are those of the individual and not of this organization; and
 4. This organization is also exempt from certain state and local taxes, including but not limited to state income tax, state sales tax, and local real estate taxes. All employees, independent contractors, volunteers or students must make a good faith effort not to jeopardize this organization's exemption from state and local taxation.

Policy Implementation and Oversight

1. This organization's CCO is responsible for the oversight and implementation of this policy. The CCO office is located at the Regional Administrative Office at 1351 Newtown Pike, Lexington, Kentucky 40511-1272; 859/253-1686 extension 585. Each employee, independent contractor, volunteer, or student has a duty to report any suspected violations of any of these Standards to the CCO and/or their supervisor, SAM, CFO, CEO, or calling the Compliance Hotline at 1-855-727-8702;
2. When the CCO, working in conjunction with the internal Corporate Compliance Committee, is made aware of a potential violation of these Standards, he/she may initiate and coordinate the investigation of such reported allegations of unethical or

- improper practices and subsequently report and recommend corrective action, if applicable, to the Executive Committee of the Board;
3. Staff under the direction of the CFO shall review and disseminate to the Human Resources (HR) Department the monthly program exclusion listing by the Inspector General's Office that is published in the *Federal Register*. HR staff are responsible for ensuring proper notification is given to programs of the Board when an employee is identified on the exclusion list;
 4. The CCO and CFO as appropriate shall regularly review and disseminate new statutes, regulations, pronouncements, or directives of the federal or state government, the government's fiscal intermediary, any third-party payers, or any hospital association or trade publication that might affect these Standards; and
 5. The CCO shall work in conjunction with the Director of Information Systems and the CFO to establish ongoing financial audits specific to the business of the organization to allow early detection of errors or to prevent opportunity of fraud and abuse. Periodic reviews to monitor the accuracy of documentation, claims and other information reported to all payers, as well as compliance with applicable procedures and regulations shall be conducted by staff under the direction of the CFO. The CFO shall be responsible for and oversee the financial controls for day to day compliance of this organization's financial policies and procedures and work with external auditors on the Annual External Audit and receive any suspected reports of wrongdoing from employees. This organization's Information System Department additionally employs automated checks for identifying inaccuracies within the billing system/processes. As appropriate, reports shall be made to the President/CEO to ensure Management and/or the Board is aware of audit results and of any problems that need corrective action.

How to Make a Report

Bluegrass requests, expects, and encourages board members, employees, independent contractors, volunteers and students to report any suspected violations of laws, statutes, rules, or applicable regulations. No concern regarding conduct or compliance is too small. Any board member, employee, independent contractor, volunteer or student wishing to report suspected misconduct or make a compliance-related inquiry should do the following:

1. Contact your supervisor or SAM. If they are unable to solve the problem, you should feel free to contact their supervisor.
2. If a supervisor or SAM is not able to resolve the issue, or if you would prefer not to report the issue to either of them, call the Corporate Compliance Officer at 859/253-1686 extension 585.
3. In some cases, you may want to report a situation without revealing your identity. For those concerns call the Compliance Hotline at 1-855-727-8702. Please leave enough detailed information about the suspected report of violation of laws and/or wrongdoing so that a thorough investigation can be initiated. Even if you choose to identify yourself, your identity shall be kept confidential to the fullest extent possible or as permitted by law.

Reports and/or calls shall be documented by the CCO. After review, the CCO shall determine the appropriate action to take, such as investigation, referral to the internal Corporate Compliance Committee, Board of Directors and/or President/CEO.

A person making a report shall not be reprimanded or disciplined for giving incorrect information in the course of reporting their concern. The only time someone shall be disciplined for making a report is if the person reports something they know is false or misleading in order to harm someone.

Employee Guidance

Bluegrass Regional MH – MR Board, Inc. is committed to providing quality healthcare services consistent with our mission with honesty and integrity evidenced by complying with all applicable federal and state laws. Bluegrass is providing you with detailed information about these laws in order to further guide you in recognizing and/or reporting suspected false claims activity. While the following information does not outline every law that concerns healthcare providers, it is intended to highlight certain wrongful activity that the federal and state governments have specifically targeted in the healthcare profession along with the associated non-compliance penalties. Unlawful activity, such as false claims, could jeopardize Bluegrass' ability to continue to serve our clients.

False Claims Laws (Federal and Kentucky)

The False Claims Act (FCA), 31 USC 3279-3733 is a federal law that strictly prohibits a person or organization from knowingly submitting a false claim or using a false record to receive payment or property from the federal government, whether the payment is received directly or indirectly. Knowingly means that someone actually knew that the claim was false, deliberately ignored whether the claim was false, or acted with reckless disregard for the truth of the submitted claim.

Kentucky false claims laws under KRS 205.8451 to 205.8483 prohibit a person or organization from knowingly submitting a false claim or making a false record or statement in order to receive payment from the state or a local government agency. These federal and state laws apply to Medicare and Medicaid reimbursement.

The Medicare and Medicaid Patient Protection Act of 1987, as amended, 42 U.S.C. 1320a-7b and commonly referred to as the "Anti-kickback Statute", provides for criminal penalties for certain acts impacting Medicare and state health care (e.g., Medicaid) reimbursable services. This statute prohibits the offer or receipt of certain remuneration (including any kickback, bribe or rebate directly or indirectly, overtly or covertly, in cash or in kind) in return for referrals for or recommending purchase of supplies and services reimbursable under government health care programs.

The Program Fraud Civil Remedies Act of 1986 (PFCRA) provides for fines against persons who make, or cause to be made, a false claim or written statement to certain

federal agencies, including the Department of Health and Human Services which administers the Medicare Program.

The Health Insurance Portability & Accountability Act of 1996 (HIPAA) provides guidelines for the distribution and privacy and security protections of individually identifiable health care information.

The American Recovery and Reinvestment Act of 2009 (ARRA) provides funding for research and other healthcare needs, including technology. In order to accept ARRA funding, employers must prohibit retaliation against employees who make good faith reports of misconduct.

Part of ARRA contains the Health Information Technology for Economic and Clinical Health Act (HITECH). HITECH widens the scope of privacy and security protections available under HIPAA including increases in non-compliance penalties and more enforcement.

Examples of False Claims

Some examples of false claims are: submitting a bill to Medicaid for services that were never provided; submitting a bill for services that were provided on a different day and time than stated in the claim; billing for a more expensive service than was actually rendered; billing for medically unnecessary services; or filing a false cost report at the end of the year to avoid returning Medicaid funds that were improperly received.

Penalties for Violating the False Claims Laws

If the Federal FCA is violated, a person or organization shall be fined between \$5,500 and \$11,000 for each false claim submitted, fined up to three times the total amount of losses the false claim created for the government, and shall face potential exclusion from participation in federally funded programs. Individuals, including employees, can bring a civil action on behalf of the Federal government for violations of the Federal False Claims Act. In return, the individual may share a percentage of any monetary recovery or settlement.

A person or organization found guilty of violating the Kentucky false claims laws shall be fined up to \$500 per false claim, three times the amount unlawfully received plus interest, payment of the government's legal fees and costs to pursue reimbursement, and exclusion from the Medicaid program for up to five years. Any licensed medical provider found guilty of the criminal false claims provisions must forfeit his or her license to practice his or her profession for at least five years. Anyone charged with Medicaid fraud could also face criminal misdemeanor or felony charges depending on the type of fraud involved and/or the amount of money unlawfully received. In addition, Kentucky's criminal code has various laws for prosecuting fraud including, but not limited to KRS Chapter 514, 516-519 and 523 dealing with theft, forgery, perjury and the like.

PFCRA provides that any person who makes, presents or submits, or causes to be made, presented, or submitted a claim that the person knows or has reason to know is false,

fictitious, or fraudulent is subject fines of up to \$5,000 per false claim or statement and up to twice the amount claimed in lieu of damages.

A person or organization violating the Anti-kickback statute shall be fined up to \$25,000 or imprisoned up to five years, or both.

Protections for Whistleblowers

The Federal False Claims Act allows individuals with first-hand knowledge of fraud involving government funds to file a lawsuit on behalf of the government. These individuals are known as “whistleblowers,” and the suits filed on behalf of the government are called “qui tam” suits. If the suit is successful, the whistleblower may receive a portion of the money received by the government.

Currently, the Kentucky false claims laws do not give individuals or employees a right to file a civil action on behalf of the government and share in recoveries. Only the Attorney General of the Commonwealth may file civil or criminal proceedings against an individual, company, facility or institution in order to enforce the Kentucky false claims laws. Like federal law, Kentucky law also provides protection for whistleblowers. Kentucky law requires any person who knows or has reasonable cause to believe that a violation of the Kentucky false claims laws has been or is being committed by any person, corporation or entity, to report such information to the Kentucky Medicaid Fraud Control Unit, or to the Medicaid Fraud and Abuse hotline at (800) 372-2970.

Whistleblowers are protected from being fired, demoted, threatened or harassed by his or her employer as a result of filing lawsuits and/or making reports of false claims disclosures of fraud, waste and abuse. If a whistleblower believes he or she has been retaliated against, he or she may file a suit against the employer to be reinstated to his or her former position, recover twice the amount of any pay owed, interest on any pay owed, and compensation for any special damages that occurred as a result of the discrimination.

Bluegrass’ Organizational Integrity & Compliance Plan

Bluegrass holds all employees, independent contractors, volunteers and students responsible for complying with federal and state laws that prohibit the making of false claims and for otherwise conducting Bluegrass affairs lawfully. As such, you are required to adhere to our Code of Conduct evidenced below by:

1. Performing all business activities and duties with honesty and integrity according to Bluegrass’ Code of Conduct and Conflict of Interest Standards.
2. Following all laws and regulations that apply to your business activities and duties, including requirements of government social service or health care programs. These requirements generally include, but are not limited to, maintaining complete and accurate records and submitting only complete and accurate claims for medically necessary services or equipment actually provided; and
3. Contacting an immediate supervisor, SAM, CFO, CEO or CCO, or calling the Compliance Hotline at 1-855-727-8702 if you have knowledge of or a concern about a potential false claim or other violation.

Bluegrass' policies strictly prohibit retaliation, in any form, against an individual reporting an issue or concern in good faith. Retaliation is subject to discipline, including termination of employment. Thank you for your commitment to maintaining our high ethical standards and assisting us in our efforts to prevent and eliminate fraud, waste, and abuse in the provision of our quality services.

Revisions

The policy was initially approved by the Board of Directors and made effective June 1999, and subsequently revised and approved January 2009, August 2012 and February 2013, October 2013.

The policies stated herein are subject to change at the sole discretion of the Bluegrass Regional Mental Health – Mental Retardation Board of Directors. If any board member, employee, independent contractor, volunteer or student has a question concerning a particular provision contained herein, or concerning any practice not addressed in this document, he or she should confer with the CCO by calling (859) 253-1686 extension 585.

Bluegrass Regional Mental Health - Mental Retardation Board, Inc.
Organizational Integrity and Compliance Plan

Employee/Board Member/Independent Contractor/Volunteer/Student

Acknowledgment

I, _____, do hereby acknowledge and confirm that I have
(Print Name)
received a copy of Bluegrass' *Organizational Integrity and Compliance Plan*. I have read
the Plan and do agree that while I am a board member, employee, independent contractor,
volunteer or student of Bluegrass, I have a duty to report any suspected violations of it. I
also agree to conduct myself in accordance with the Plan, including the specific Code of
Conduct and Conflict of Interest Standards.

Signature

Date