



LIFEPATH SYSTEMS CODE OF CONDUCT

Introduction

LifePath Systems (LPS or the Center) is dedicated to conduct that adheres to the highest ethical standards. Common sense, good business judgment, ethical personal behavior, as well as compliance with applicable laws, policies and procedures are what we expect from all LPS workforce members, extended community members and business associates including our employees, volunteers, clinicians, vendors, contractors and others affiliated with or doing business on behalf of LPS.

The LPS Code of Conduct details the fundamental principles, values and framework for action within LPS. It is intended to deter wrongdoing and promote:

- Honest and ethical conduct
- Compliance with all applicable federal, State and local laws, rules and regulations
- Prompt internal reporting of violations and compliance concerns

It provides a general overview of basic compliance concepts and guidance on acceptable behavior. It is not intended to fully describe the laws that apply to employees, (or more broadly to workforce members) or to detail LPS policies and procedures.

Additional information regarding LPS compliance is provided in the LPS Annual Compliance Program, available on the LPS website, payroll website, your supervisor, contract manager (if applicable), Human Resources Director or from our Chief Compliance Officer.



Our Mission

To serve individuals and families impacted by behavioral health, intellectual or developmental challenges, resulting in stronger communities.

Our Values

LifePath Systems is committed to the following values:

1. Service Excellence:

We will provide timely, professional, effective and efficient service to all individuals receiving services.

2. Stewardship of Resources:

We will utilize all Center resources efficiently, appropriately, and with transparency and ethical and fiscal accountability.

3. Integrity:

We will act with honesty and honor without compromising the truth.

4. Workforce Development:

We understand that the professionalism and drive of our people are the most important factors in the quality of the services LPS provides. We will hire talented people, increase their skills through training and experience, and provide opportunities for personal and professional growth within the Center.

5. Credibility:

We will strive to earn enduring credibility with our stakeholders, which we believe is essential to maximizing our potential as a health care provider.

6. Community:

We will continue to help meet the needs of an underserved segment of our population thus contributing to society and demonstrating social responsibility.

7. Continuous Improvement in Measurable ways:

We will identify the key needs of individuals receiving services, assess how well we meet those needs, continuously improve our services and measure our progress.



Our Service Delivery Model

LPS is committed to providing high-quality services in the communities we serve, and advocate a responsive management style and a philosophy for those who receive our services based on integrity and competence.

We treat those who receive our services with respect and dignity, providing high-quality, compassionate care in a clean, safe environment.

The LPS Code of Conduct applies to all LPS workforce members, extended community members and business associates including our employees, volunteers, clinicians, vendors, contractors and others affiliated with or doing business on behalf of LPS.

Health Care Professionals:

In addition to the LPS Code of Conduct, health care professionals are expected to have and maintain all required licenses and follow the ethical and professional standards dictated by their respective professional organizations and licensing boards.

Leadership Responsibilities:

We expect our leaders to set the example — to be in every respect a role model. Our leaders should help to create a culture that promotes the highest standards of conduct based on ethics and compliance. We must never sacrifice ethical and compliant behavior in the pursuit of business objectives.

Compliance

LPS is committed to full compliance and expects its workforce members to obey all applicable federal, State and local laws, to comply with LPS Policies and Procedures and division procedures and to follow the LPS Code of Conduct. Compliance will be an important aspect of performance evaluations. A violation of LPS Code of Conduct, policies or procedures or division procedures, or any law or regulation will be handled through normal disciplinary procedures, and may lead to serious disciplinary action, up to and including immediate termination.



LPS Policies and Procedures:

LPS workforce members are required to understand and follow all policies and procedures that apply to their work at LPS. This Code of Conduct is located in the LPS Policy and Procedure Manual. If anyone has a question about the applicable legal, policy or procedural requirements, they should ask their supervisor or the LPS Human Resources Department. The LPS Policy and Procedure Manual is available on the LPS systems drive, or by contacting your supervisor or through your contract manager (if applicable).

Laws and Regulations:

LPS workforce members are expected to perform their duties in good faith to the best of their ability and not engage in any illegal, unfair or deceptive conduct relating to business practices. LPS expects its workforce members to fully comply with all applicable laws and regulations including federal, State, and local. Failure to comply with legal requirements can lead to serious disciplinary action, up to and including immediate termination. Key health care compliance laws which are also addressed in the LPS Annual Compliance Program include (but are not limited to):

- Title XVIII of the Social Security Act.
- The physician self-referral law, known as the Stark law, which prohibits health care entities from submitting any claim for certain services called designated health services if the referral comes from a physician with whom the health care entity has a prohibited financial relationship.
- The federal anti-kickback statute and similar Texas statutes, which prohibit payments (direct or indirect), made to induce or reward the referral or generation of government health care program business.
- The Emergency Medical Treatment and Labor Act (EMTALA), which contains requirements for the evaluation and treatment of emergency clients.
- Laws authorizing the U.S. Department of Health and Human Services (HHS), Office of Inspector General (OIG), to exclude health care providers from participation in federal health care programs that provide unnecessary or substandard items or services provided to any client.
- Privacy and security laws and regulations that protect client information, including protected health information (PHI) under the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the Health Information Technology for Economic and Clinical Health (HITECH) Act of 2009, the Final Omnibus Rule, and the Texas Medical Records Privacy Act as amended by Texas H.B.300, which went into effect September, 2012.
- Federal and Texas false claims statutes and whistleblower protections that serve a key role in preventing and detecting fraud, waste, and abuse in the federal health care programs.

Coding and Billing Integrity:

All billing practices as well as the preparation and filing of cost reports must comply with all federal and Texas laws and regulations as well as LPS Policies and Procedures and division procedures. LPS management will assist workforce members in identifying and appropriately resolving any coding or billing issues or concerns. LPS will refund overpayments made by a federal health care program or other payers in accordance with applicable law.



Relationships with Federal Health Care Beneficiaries:

Federal fraud and abuse laws prohibit offering or providing inducements to beneficiaries in government health care programs and authorize the Office of Inspector General (OIG) to impose civil money penalties (CMPs) for these violations. Government health care programs include Medicare, Medicaid, Veterans Administration and other programs. LPS workforce members may not offer valuable items or services to these clients to attract their business (including gifts, gratuities, certain cost-sharing waivers, and other things of value).

Fraud and Abuse, the False Claims Act and Whistleblower Protections:

LPS intends to fully comply with the federal False Claims Act (FCA) and Texas laws that fight fraud and abuse in government health care programs. The FCA contains a qui tam or whistleblower provision, which permits a private person with knowledge of a false claim for reimbursement by a government agency to file a lawsuit on behalf of the U.S. government. In addition, there are Texas laws and regulations providing that persons who report fraud and abuse by participating health care providers in the Medicaid Program may be entitled to a portion of the recovery. Under both the FCA and similar Texas laws, there are protections against retaliation.

Ineligible Persons Excluded Individuals and Entities:

LPS does not do business with, hire, or bill for services rendered by excluded or debarred individuals or entities. Workforce members must report to their supervisor, contract manager (if applicable), Human Resources Director or Chief Compliance Officer immediately if they become excluded, debarred or ineligible to participate in any government health care program, or become aware that anyone doing business with or providing services for or on behalf of LPS has become excluded, debarred or ineligible.

Monitoring and Investigation:

LPS is committed to monitoring and investigating compliance concerns relating to laws, regulations and/or LPS Policies and Procedures and division procedures. When a violation is substantiated, LPS will initiate corrective action including, as appropriate, resolving overpayments, making required notifications to government agencies, implementing systemic changes to prevent recurrences, and instituting disciplinary action.

Medical Records

LPS strives to ensure medical records are accurate and to provide information that documents the treatment provided and supports the claims submitted. Tampering with or falsifying medical records, financial documents or other business records of LPS will not be tolerated. The confidentiality of client records and information must be maintained in accordance with privacy and security laws and regulations that protect client information, including protected health information (PHI) under HIPAA and HITECH and applicable Texas laws.



Employment

LPS promotes diversity and strives to provide a workplace environment that is in full compliance with all applicable employment-related laws as well as LPS Policies and Procedures and division procedures. It is LPS policy to provide equal employment opportunities to all personnel, prospective and current, without regard to race, color, religion, sex, age, sexual orientation, national origin, marital status, disability, or veteran status, and LPS will do its best to make reasonable accommodations for known disabilities. LPS personnel who have questions concerning or are aware of any breach of the Equal Employment Opportunity (EEO) guidelines, should contact the LPS Human Resources Department. LPS prohibits workplace violence, threats of harm and harassment of its personnel of any kind.

Environment and Workplace Safety

LPS expects its workforce members to obey all federal, State and local environmental and workplace safety laws, regulations and rules, including those promulgated by the Environmental Protection Agency and the Occupational Safety and Health Administration (OSHA).

Reporting Suspected Wrongdoing

LPS is committed to complying with all applicable laws and regulations, including those designed to prevent and deter fraud, waste and abuse. LPS workforce members with knowledge of or who in good faith, suspect any wrongdoings are required to promptly report the matter, using one of the processes described below.

In most cases, concerns should be brought to the attention of a supervisor first. If this does not result in appropriate action, or if personnel are uncomfortable discussing these issues with their supervisor, they can use one or more of the other reporting methods described below:

- Report to a program administrator, division director, Human Resource Director, or the LPS Chief Compliance Officer.
- Use the LPS Employee Compliance Hotline (972.330.4301) — these reports may be made anonymously.
- Members of the LPS workforce who are not employees may contact their LPS supervisor, LPS contract manager (if applicable), the LPS Chief Compliance Officer or the LPS Consumer Complaint and Fraud and Abuse Hotline (972. 372.0321).

Any workforce member who becomes aware of improper conduct but knowingly declines to report the improper conduct may be subject to disciplinary action up to and including immediate termination.

Self-reporting is encouraged — anyone who reports their own wrongdoing or violation of law will be given due consideration in potential mitigation of any disciplinary action. **Retaliation in any form against anyone who makes a good faith report of actual or suspected wrongdoing or cooperates in an investigation is strictly prohibited.** Anyone who feels that they have been retaliated against should report this immediately, using any of the methods described above.