**CODE OF CONDUCT**

## Introduction

LifePath Systems (the Center) is committed to conduct that adheres to high ethical standards. Common sense, good business judgment, ethical personal behavior, as well as compliance with applicable laws, policies and procedures are what the Center expects from all members of the LifePath Systems workforce including our employees, volunteers, clinicians, vendors, contractors, and others affiliated with or doing business on behalf of LifePath Systems, whether paid or unpaid.

The LifePath Systems Code of Conduct details the fundamental principles, values, and framework for action within LifePath Systems. It is intended to complement the Center’s Mission Statement, and Values and promote:

* Honest and ethical conduct;
* Compliance with all applicable federal, state, local laws, and regulations; and,
* Prompt internal reporting of violations and compliance concerns.

The Code of Conduct applies anytime workforce members’ actions or behavior could be associated with the Center. This includes on and off-Center premises, at any time regardless of a workforce member’s work schedule, and via any medium, including social media, such as (but not limited to) Facebook, YouTube, LinkedIn, Tik Tok, Instagram, and Twitter. The Code of Conduct provides general guidance on acceptable behavior and is not intended to fully describe the laws and regulations that apply to workforce members or to detail LifePath Systems policies and procedures. However, workforce members are expected to be sensitive to key laws, regulations, policies, and procedures, and to know how to access the LifePath Systems Policy and Procedure eBook for additional guidance related to this Code of Conduct.1

## Our Service Delivery

LifePath Systems is committed to providing high-quality services in the communities served that incorporates trauma-informed principles and is culturally and linguistically appropriate.

LifePath Systems workforce members will participate in regular trainings in order to maintain skills and develop additional skills as new evidenced-based practices emerge.

LifePath Systems workforce members are expected to treat those who receive services with respect and dignity, providing high-quality, compassionate care in a clean, safe environment.

## Professional Representation

LifePath Systems workforce members will represent their qualifications, credentials, criminal history and professional experience honestly and accurately on their application, resume, during an interview, and during on-going employment.

Workforce members will inform individuals receiving services of the anticipated benefits and potential risks of treatment, the scope of services being provided, and the qualifications/titles of any service providers.

Licensed professionals are expected to have and maintain all required licenses, adhere to the established code of conduct or their profession, and follow the ethical and professional standards dictated by their respective professional organizations and licensing boards.

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LifePath Systems will report violations of professional ethics to the relevant Board or Commission that oversees that discipline.

## Leadership Responsibilities

LifePath Systems leaders are expected to set the example and to be in every respect a role model. Leaders should help to create a culture that promotes the highest standards of conduct based on ethics and compliance. The Center must never sacrifice ethical and compliant behavior in the pursuit of business objectives.

## Compliance

LifePath Systems is committed to full compliance and expects its workforce members to obey all applicable federal, state, and local laws and regulations, and to comply with LifePath Systems Policies and Procedures.

Compliance is an important aspect of performance evaluations. A violation of LifePath Systems Code of Conduct, policies or procedures or any law or regulation will be handled through approved disciplinary procedures, and may lead to serious disciplinary action, up to and including immediate termination.

## LifePath Systems Policies and Procedures

LifePath Systems workforce members are required to understand and follow all policies and procedures that apply to their work at LifePath Systems.

The LifePath Systems Policy and Procedure Manual is available on the Center’s Global (J) drive, or by contacting your supervisor (or contract manager, if applicable).

Any questions about the applicable legal, policy or procedural requirements, should be directed to your supervisor (or contract manager, if applicable) or the LifePath Systems Human Resources Department or Compliance and Quality Assurance Department.

## Laws and Regulations

LifePath Systems 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. LifePath Systems 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 healthcare compliance laws which are also addressed in the LifePath Systems Biennial 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 healthcare entities from submitting any claim for certain services called designated health services if the referral comes from a physician with whom the healthcare 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 healthcare program business.
* The Emergency Medical Treatment and Labor Act (EMTALA), which contains requirements for the evaluation and treatment of emergency individuals.

Laws authorizing the U.S. Department of Health and Human Services (HHS), Office of Inspector General (OIG), to exclude healthcare providers from participation in federal healthcare program that provide unnecessary or substandard items or services provided to any individual receiving services.

* Privacy and security laws and regulations that protect individual 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.
* Federal and Texas false claims statutes and whistleblower protections that serve a key role in preventing and detecting fraud, waste, and abuse in government funded healthcare programs.

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

LifePath Systems will fully comply with the federal False Claims Act (FCA) and Texas laws that fight fraud and abuse in government healthcare 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 that may allow an individual who reports fraud or abuse in the Medicaid Program, to receive a portion of the recovery. Under both the FCA and similar Texas laws, there are protections against retaliation.

## Confidentiality

All workforce members will adhere to LifePath Systems Policies and Procedures on confidentiality and related state and federal laws and regulations that protect individual information, including protected health information (PHI):

* Health Insurance Portability and Accountability Act of 1996 (HIPAA)
* Health Information Technology for Economic and Clinical Health (HITECH) act of 2009
* Texas Medical Records Privacy Act as amended by Texas H.B. 300, which went into effect September 2012.

Workforce members will always show respect for each individual’s privacy by monitoring office, lobby, and hallway conversations of themselves and others.

Workforce members will not acknowledge individuals in public places unless the individual initiates contact.

Workforce members with access to sensitive personal information (SPI) in regard to personnel records, workforce payroll, or other related personnel information shall not share information or use information in any manner other than stated in their job description.

## Conflicts of Interest

A conflict of interest exists when an individual’s private interests interfere in any way with the interests of LifePath Systems. A conflict situation can arise when a member of our workforce takes an action or has interests that may make it difficult to perform their work objectively and efficiently.

Conflicts may also arise when a member of our workforce or their family, receives improper personal benefits as a result of their position at LifePath Systems.

It is the workforce member’s responsibility to report potential conflicts to their supervisor immediately. Any exceptions to the Center’s conflict-of-interest rules must be approved by the Chief Executive Officer.

## Relationships with Individuals

LifePath Systems’ workforce members must maintain a professional relationship with individuals in all settings, including any social interaction or activity.

Workforce members will not enter into any personal, financial, or employment relationship with any individual receiving services or their family members (including but not limited to babysitting or respite, selling, purchasing, lending or borrowing money or property).

Engaging in any dating or sexual relationship with current or former individuals served is strictly prohibited.

Workforce members will not practice or condone any form of discrimination in their relationships or the implementation of their treatment with individuals, including race, religion, gender identification, age, etc.

Workforce members will respect each individual served and their family’s personal values and choices.

Workforce members will not communicate with any individuals or their families through any social media including but not limited to Facebook, Twitter, SnapChat, Instagram, etc.

## Gifts

Workforce members may not accept personal gifts with a value of more than $50 from individuals served or vendors/potential vendors.

Vendors or individuals served are allowed to provide something that can be shared with other workforce members (i.e., food or small marketing materials such as pens, cups, etc.).

## Relationships with colleagues:

LifePath Systems’ workforce members will show respect to colleagues at all times.

Workforce members will avoid negative comments or criticism of colleagues in communications with individuals served or other workforce members.

Workforce members will handle disagreements with other workforce members professionally and privately. If the matter cannot be resolved between colleagues, workforce members should refer the problem to the immediate supervisor.

Workforce members will not solicit individual colleagues to sell products, collect donations, either during or after work hours. There will be a designated location at each site where these requests can be posted (“News” on bulletin boards).

Workforce members who are related to (through marriage or blood) or dating another workforce member may not supervise that person, approve their timesheets or expense reports, write expense reimbursement checks, sign status change requests or authorize any changes in their employment status or job responsibilities.

Should a situation arise where two workforce members in the same unit begin dating and one is in a supervisory position, one of the two must request transfer to another department immediately.

Workforce members cannot use social media (Facebook, Twitter) to discuss any other workforce member or individual served, personal issues, or dissatisfaction or disagreements with LifePath Systems or any of its workforce members.

## Coding and Billing Integrity

All billing practices, including the preparation and filing of cost reports, must comply with federal and Texas laws and regulations as well as LifePath Systems Policies and Procedures.

LifePath Systems management will assist applicable workforce members in identifying and appropriately resolving any coding or billing issues or concerns. LifePath Systems will refund overpayments made by a federal health care program or other payers in accordance with applicable law.

Workforce members will document accurately in all individuals’ served records, timesheets, financial transactions, billing and report generation.

## Relationships with Federal Health Care Beneficiaries

Workforce members will comply with federal fraud and abuse laws which prohibit offering or providing incentives 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.

Workforce members may not offer incentives of any kind to the beneficiaries, employees, or representatives of these programs to attract their business (including but not limited to gifts, gratuities, certain cost-sharing waivers, and other items of value).

## Ineligible Persons, Excluded Individuals, and Entities

LifePath Systems does not do business with, hire, or bill for services rendered by excluded or debarred individuals or entities.

Workforce members are required to report to their supervisor, or the Human Resources Department immediately if the workforce member becomes excluded, debarred or ineligible to participate in any government health care program, or becomes aware that anyone doing business with or providing services for or on behalf of LifePath Systems has become excluded, debarred or ineligible. Supervisors are required to report knowledge of a workforce member becoming excluded, debarred, or ineligible for participation in a governmental healthcare program immediately to the Human Resources Department. All workforce members are checked through the Office of Inspector General (OIG) before they report to work and on a monthly basis as required by the OIG.

## Monitoring and Investigations

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

## Medical Records

LifePath Systems strives to ensure medical records are accurate and to provide information that documents the treatment provided and supports claims submitted. Tampering with or falsifying medical records, financial documents, or other business records of LifePath Systems will not be tolerated.

The confidentiality of protected health information must be maintained in accordance with privacy and security laws and regulations, including protected health information (PHI) under the Health Information Portability and Accountability (HIPAA) Act, the Health Information Technology for Economic and Clinical Health (HITECH) Act, and applicable Texas laws.

## Employment

LifePath Systems promotes diversity and strives to provide a workplace environment that is in full compliance with all applicable employment-related laws as well as LifePath Systems Policies and Procedures.

It is LifePath Systems 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 LifePath Systems will do its best to make reasonable accommodations for known disabilities.

LifePath Systems personnel who have questions concerning or are aware of any breach of the Equal Employment Opportunity (EEO) guidelines, should contact the LifePath Systems Human Resources Department. LifePath Systems prohibits workplace violence, threats of harm, and harassment of its personnel of any kind.

## Environment and Workplace Safety

LifePath Systems expects its workforce to obey all state, federal and local environmental and workplace safety laws, and regulations, including those endorsed by the Environmental Protection Agency and the Occupational Safety and Health Administration (OSHA).

## Reporting Suspected Wrongdoing

Members of the LifePath Systems workforce have a responsibility to report any suspicion or knowledge of wrongdoings promptly, using one of the processes described below.

* Report the issue to a supervisor, program administrator, division director, Director of Human Resources, or Chief Compliance Officer, or
* Report the issue via the LifePath Systems Employee Compliance Hotline (972.330.4301).
  + Calls to the Hotline may be reported anonymously and no workforce member who reports a suspected violation in good faith will be subject to disciplinary action or punished in any way for making a report.

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 — workforce members 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**. Workforce members who suspect they have been retaliated against should report the retaliation using any of the methods described above.