CODE OF CONDUCT

Introduction

LifePath Systems (the Center) is committed 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 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 to all workforce members of the Center whether on or 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 X (formerly 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. Workforce members are expected to be aware of and gain a general understanding of key laws, regulations, policies, and procedures relevant to their assigned duties.

Our Service Delivery

LifePath Systems is committed to providing high-quality services in the communities served. All services shall be[1]:

- Delivered on the basis of individual need and without regard to race, creed, color, national origin, age, sex, physical handicap, or ability to pay.

- Delivered to each individual in accordance with an individualized, person-centered service plan using approved trauma-informed principles that are culturally and linguistically appropriate.

- Monitored and evaluated to ensure that services are delivered according to established standards, in an efficient manner, with measurable outcomes.

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

- Workforce members are prohibited from entering into any personal, financial, or employment relationship with an individual receiving services or their family members (including but not limited to providing childcare services, in-home or out-of-home respite, and the selling, purchasing, lending, or borrowing of money or property).

- Workforce members are prohibited from communicating with any individuals or their families through any social media platform including but not limited to Facebook, X(formerly Twitter),

[1] See LifePath Systems Policy 6.01 *Service Delivery*

SnapChat, Instagram, etc.

- Workforce members are prohibited from engaging in any dating or sexual relationship with individuals actively enrolled in services.

- Workforce members are prohibited from accepting any personal gifts from individuals receiving services, vendors, and other parties with an established, or seeking to establish, business relationship with the Center.

- Workforce members are not allowed to physically alter or damage Center-owned resources in any manner, this includes but is not limited to adding stickers to laptops or cell phones, placing stickers on furniture, removing blinds from offices, etc.

- Workforce members are not allowed to load personal software on their Center-owned device. All software must be either installed by the MIS department or by someone contracted by the MIS department. Individual users are not authorized to install any software on Center-owned devices[2].

- To minimize risk to the Center's network, only approved devices are allowed to be used on the Center's network or connected to the Center's email service. Your personal devices, such as iPhone, iPads, Smart Phones, laptops, tablets, PDA's, etc. may not be used to connect to the Center's network without express approval by the MIS department.

- Center-specific information must be analyzed, processed, and disseminated using MIS approved applications, systems, and equipment. Workforce members are prohibited from using unauthorized augmented and/or artificial intelligence (AI) and browser analytics systems to generate Center required documentation and reporting.

- Workforce members who are authorized to use a personally owned device to connect to the Center's network must have anti-virus and mobile device management (MDM) software installed on their personal mobile device by the MIS department prior to use[3].

Professional Representation

Workforce members will demonstrate relevant competencies to include critical, specialty, and crisis competencies, prior to assuming duties and having contact with individuals served or contact with confidential information and protected health information (PHI).

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 the course of their employment/affiliation with the Center.

Licensed professionals are expected to have and maintain all required licenses[4], and adhere to the ethical and professional standards dictated by their respective professional organizations and licensing boards. LifePath Systems will report violations of professional ethics to the relevant Board or Commission of that discipline.

[2] See LifePath Systems procedure 8.02.06 *MIS User Procedures*

[3] See LifePath Systems procedure 8.02.10 *Bring Your Own Device (BYOD)*

[4] See LifePath Systems procedure 3.04.04 *Credentialing and Recredentialing*

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 all applicable service providers.

Workforce members will represent themselves accurately when using Center information systems and external systems by only using their unique designated login information. Sharing login information is strictly prohibited and may result in immediate termination[5].

Policies and Procedures

LifePath Systems policies and procedures eBook includes all policies approved by the Board of Trustees and procedures approved by the Chief Executive Officer. Workforce members are expected to regularly access the LifePath Systems Policies and Procedures (P&P) eBook and understand that it is their responsibility to comply with ALL published guidance. It is the responsibility of the division directors, program administrators, and supervisors to review all policy and procedure changes with their direct reports to address all areas specific to their program area, and ensure appropriate training and education is provided to all applicable workforce members.

Leadership Responsibilities

Effective leadership is the ability of a leader to execute strategic business goals while creating a work culture that allows workforce members to contribute meaningfully to the achievement of those goals. It is the expectation that LifePath Systems leaders promote the highest standards of conduct through continued compliance with applicable ethical guidelines and standards. Leaders are expected to show impartial, fair treatment to all workforce members. LifePath Systems leaders must never sacrifice ethical and compliant behavior in the pursuit of business objectives.

Compliance

LifePath Systems is committed to maintaining a culture of compliance and quality. In striving to fulfill our vision and carry out our mission, all members of the LifePath Systems workforce must meet public expectations for excellence by providing high quality healthcare and related services, demonstrating sound stewardship of resources, acting with integrity, and displaying fair treatment and respect for all. Those acting on behalf of LifePath Systems have a general duty to demonstrate accountability and compliance with all applicable policies and procedures, federal, state, and local laws, and regulations.

LifePath Systems workforce members are expected to be sensitive to legal and ethical issues, have an ongoing awareness of key compliance issues, be aware of how to access the LifePath Systems' Policy and Procedure eBook and understand their responsibility to report fraud, waste, or abuse to LifePath Systems management.

Responsibility to Report

LifePath Systems workforce members are required to report any information regarding a known or suspected violation of any applicable laws, regulations, ethical standards, Code of Conduct violations or LifePath Systems policies or procedures as soon as they become aware of such. If a member of the workforce has difficulty interpreting a policy or procedure, they should consult with their supervisor to determine whether consultation with the Director of Human Resources or the Compliance Officer is

[5] See LifePath Systems procedure 8.02.02 *Technology Security*

appropriate[6].

Workforce members are required to self-report any conviction, incarceration, criminal fine, probation, community service, or deferred adjudication occurring after the last performed background check[7].

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[8].

Workforce members are required to immediately report cases of alleged abuse, neglect, and exploitation of individuals receiving services to the appropriate authorities, including the Department of Family Protective Services (DFPS), law enforcement and regulatory agencies. LifePath Systems requires its workforce members to make reports of possible abuse, neglect, and exploitation immediately upon discovery (within one hour of awareness) and shall be subject to disciplinary action and possible criminal prosecution if this requirement is not met.

Workforce members are required to report unusual incident immediately upon discovery via LifePath Systems Compliance Incident Reporting and Management System.

Any violation of LifePath Systems' Code of Conduct, policies, procedures, or applicable laws and/or regulations will be handled through approved disciplinary processes, and may lead to serious disciplinary action, up to and including immediate termination.

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 health care compliance laws which are also addressed in the LifePath Systems Biennial Compliance Plan include (but are not limited to):

- Title XVIII and Title XIX of the Social Security Act.

- The physician self-referral law, known as the Stark Lw, which prohibits health care entities from submitting any claim for certain services, also referred to as designated health services, if the referral comes from a physician with whom the health care entity has a prohibited financial relationship.

[6] See LifePath Systems Compliance Plan (accessible on the LifePath Systems' website)
[7] See LifePath Systems procedure 3.01.03 *Basic Criteria for Employment*
[8] *ibid*

- The federal anti-kickback statute and similar Texas statues, which prohibit payments (direct or indirect), made to induce, or reward the referral or generation of government health care program business.

- The Civil Monetary Penalties Law, 42 U.S.C. 1320a-7am ("CMPL") which provides for penalties against any person or entity, that knowingly presents or causes to be presented to the United States or its agents an improper claim for payment.

- The Emergency Medical Treatment and Labor Act (EMTALA), which contains requirements for evaluation and treatment of individuals experiencing a health-related emergency.

- 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 individual receiving services.

- Privacy and security laws and regulations that protect client information, including protected health information (PHI) under the Health Insurance Portability and Accountability Act (HIPAA) of 1966, the Health Information Technology for Economic and Clinal 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 health care programs.

Fraud and Abuse, the False Claims Act and Whistleblower Protections[9]

- **Health Care Fraud** is a deliberate deception or misrepresentation of services that results in an unauthorized reimbursement.
- **Health Care Abuse** refers to practices that are inconsistent with accepted medical, business, or fiscal practices.

LifePath Systems will fully comply with the federal False Claims Act (FCA) and the Texas Medicaid Fraud Prevention Act (TMFPA) (also referred to as the Texas False Claim Act) that fight fraud and abuse in government health care programs. Under both the FCA and similar Texas laws, there are protections against retaliation for filing a report in good faith. The FCA creates liability for any person who knowingly:

- Presents a false or fraudulent claim to the U.S. Government for payment or approval, which includes submission to Medicaid and Medicare.
- Uses false records or statements material to a false or fraudulent claim.
- Conceals or knowingly and improperly avoids or decreases an obligation to pay or transmit money or property to the government (Reverse False Claim).

The FCA contains a *qui tam* or *whistleblower* provision, which permits a private person with knowledge and evidence of a claim filed fraudulently with the intent to obtain reimbursement by a government agency, to file a lawsuit on behalf of the U.S. government.

[9] Texas Office the Attorney General (OAG) – Healthcare Fraud and Abuse https://www.texasattorneygeneral.gov/consumer-protection/health-care/health-care-fraud-and-abuse

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 valuable items or services to the employees or representatives of these programs to attract their business (including gifts, gratuities, certain cost-sharing waivers, and other things of value).

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 timely and accurately document all client records, time sheets, financial transactions, billing, and report generation.

Confidentiality
LifePath Systems has a legal and ethical responsibility to safeguard the privacy of individuals who receive our services, and to protect the confidentiality and security of all protected health information (PHI), as defined under the Health Insurance Portability and Accountability Act (HIPAA) of 1996, and sensitive personal information as defined by the state of Texas.

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

- Health Insurance Portability and Accountability Act (HIPAA) of 1996
- 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 receiving services in public places unless the individual initiates contact.

- Should such contact be initiated, workforce members are instructed to not discuss any matters that involve the sharing of PHI in any public/unsecured settings.

Workforce members with access to sensitive personal information (SPI) including personnel records, workforce payroll, or other related personnel information shall not share information or use such

information in any manner other than stated in their job description.

Workforce members will not access PHI or SPI outside the scope of their role/responsibility.

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 their 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 Health Information Portability and Accountability Act (HIPAA), the Health Information Technology for Economic and Clinical Health (HITECH) Act, and applicable Texas law.

Conflict of Interest
LifePath Systems workforce members and affiliate providers are expected to avoid conflicts of interest which may impede their best judgment.

- Workforce members may not use their position to influence decisions that result or appear to result in financial, personal, organizational, or professional gain for themselves or anyone with whom they have family, business, or other ties.

Workforce members are required to disclose any outside employment, volunteer, consulting, or contractual work that may pose a potential conflict with their duties. This includes any part-time or temporary work with other organizations. Workforce members must notify their supervisor and HR in writing prior to engaging in any outside employment[10].

Monitoring and Investigation
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 action.

An employee may be placed on administrative leave status, with or without notice, to permit an active review/investigation of various circumstances including allegations of dishonesty, theft or misappropriation of company funds or property, violence on the job, gross safety negligence, or acts endangering others, insubordination or any other conduct that warrants removing the employee from the worksite.

Workforce members are expected to cooperate with investigations by providing truthful accounts and relevant documentation in response to investigator questions and related information requests. Workforce members who fail to cooperate or otherwise impede an investigation may be subject to disciplinary action in accordance with LifePath Systems' Progressive Discipline procedure 3.01.19.

[10] See LifePath Systems procedure 3.12.02 *Conflict of Interest*

Workplace Health and Safety
LifePath Systems is committed to providing a safe and healthy workplace for all workforce members by establishing and maintaining an effective health and safety program.

Key elements of LifePath Systems Health and Safety Protocols include but are not limited to:

- Emergency Response Plan (procedure 6.04.01)
- Infection Control Plan and Manual (procedures 5.01.18 and 5.01.18.01)
- Environmental Safety Surveys (procedure 10.01.03)
- Security Badges (procedure 3.01.15)
- Incident and Complaint Reporting Systems (procedure 5.01.16 and 7.01.10)
- Use of Center Vehicles & Driver Responsibilities (procedure 2.02.05)

All workforce members are required to:

- Comply with the training requirements regarding safety issues;
- Follow the procedures outlined in the various safety-related plans; and report any unsafe or questionable practices or circumstances.

Employment
LifePath Systems 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, 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)[11] guidelines should contact the Lifepath Systems Human Resources department. LifePath Systems prohibit workplace violence, threats of harm and harassment of tis personnel of any kind.

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, other workforce members, and community partners. 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 their immediate supervisor or submit a workforce member complaint via the LifePath Systems Compliance Incident Reporting and Management System.

Workforce members will not solicit individual colleagues to sell products or collect donations, either during or after work hours.

[11] See LifePath Systems procedure 3.06.01 *Equal Employment Opportunity (EEO)*

Workforce members who are related to (through marriage or blood) or dating another staff 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 employees 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 are prohibited from using social media (i.e., Facebook, Instagram, X, etc.) to discuss any other member, personal issues, or disagreements with Lifepath Systems or any of its workforce members.

Reporting Suspected Wrongdoing

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

In most cases, concerns should be brought to the attention of the immediate supervisor first. If this does not result in appropriate action, or if the workforce member is uncomfortable discussing these issues with their supervisor, the workforce member shall:

- Report to a Program Administrator/Manager/Supervisor, Division Director, Director of Human Resources, or to the Compliance & Quality Assurance department.

- Submit a verbal report through the LifePath Systems Compliance Hotline (972.330.4301) or via the LifePath Systems Compliance Incident Reporting and Management System – these reports may be made anonymously[12]. Workforce members who report ethics violation in good faith will not be subject to disciplinary action or punished in any way for making a report.

- Members of LifePath Systems workforce who are not employees may contact their supervisor, contract manager (if applicable), or the LifePath Path Systems Compliance and Quality Assurance department.

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. Suspicions of retaliation shall be reported immediately, using any of the methods described above.

[12] To better facilitate subsequent investigations into the alleged misconduct, workforce members are encouraged to include as much detail as possible including identifying and contact information when reporting suspected wrongdoing.