

**HIGHLINE MEDICAL SERVICES ORGANIZATION
BOARD OF DIRECTORS POLICY/PROCEDURE**

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, President

It is the policy of Highline Medical Services Organization (“HMSO”) that its business be conducted in an ethical and honest manner and within the bounds of the law. This Code of Conduct provides “Staff”, including the Board of Directors, contracted physicians and medical facilities, other contracted medical providers, employees, students, volunteers, vendors, and other agents and contractors of HMSO who provide services on behalf of or otherwise interact with patients covered by an HMSO contract (“HMSO’s members”) and other Staff with guidelines for conducting business in a manner which fulfills that commitment.

The Code of Conduct is neither exclusive nor complete and is supplementary to the mission, vision and values of HMSO and applies to all who provide services under the auspices of HMSO or their affiliates. The standards contained in this Code of Conduct are important, and therefore any violation will be subject to discipline in accordance with applicable policies and procedures of HMSO. In addition, referral of certain matters will be made to government and regulatory agencies as appropriate. The offender may also be responsible in a civil suit for losses or other damages caused by his or her inappropriate conduct.

I. COMPLIANCE GUIDANCE.

HMSO is committed to complying with all laws and regulations and to promoting a culture of integrity.

A. Patient Care and Work Environment. HMSO and its Staff shall:

1. **Provide High Quality Cost-Effective Patient Care.** HMSO is committed to the delivery of excellent service. All Staff shall strive to treat all HMSO members in a fair professional and respectful manner. Steps shall be taken so that each member understands

his or her treatment needs and options, treatment methods utilized, and treatment outcomes. At all times, competent and qualified individuals will provide appropriate care, while considering the safety and well being of the member. All services provided to HMSO members shall be in compliance with all applicable legal and ethical standards.

2. **Provide a Safe Workplace.** It is the policy of HMSO to comply with all applicable state and federal laws designed to improve workplace safety. HMSO is committed to training Staff to carry out their work in a manner that is safe for them, their coworkers and the patients they serve. HMSO is a drug and alcohol free workplace. HMSO does not employ or contract with individuals or entities that are excluded or ineligible to participate in Federal healthcare programs, suspended or debarred from Federal government contracts, or that have been convicted of a criminal offense related to the provision of healthcare items or services and has not yet been reinstated in a Federal healthcare program, provided we are aware of such criminal offense.

3. **Not Tolerate Harassment or Discrimination.** It is HMSO's policy not to discriminate on the basis of race, ancestry, color, sex, creed, religion, national origin, age, marital status, families with children, presence of any sensory, mental or physical impairment, sexual orientation, gender expression/identity, citizenship, genetic information or any other status or characteristic protected by law in providing services to its members or the public, nor in relation to employment practices. Furthermore, HMSO prohibits harassment or discrimination of its employees in any form by supervisors, coworkers, customers, vendors or other Staff. No form of harassment or discrimination by Staff will be tolerated.

4. **Act with Honesty and Integrity.** Staff will at all times take personal responsibility for doing the right thing and acting in a manner that demonstrates a commitment to prevent unethical or illegal practices.

B. Guidelines for Legal Conduct. HMSO and its Staff shall:

1. **Comply with the Law.** HMSO is subject to numerous local, state and Federal laws pertaining to all aspects of its operation. All Staff are required to understand and abide by those laws which are applicable to them in the performance of their jobs and duties. Staff will attend any mandated training sessions and should pursue a reasonable amount of continuing self-education. It is the responsibility of Staff to notify their supervisor or the Compliance Officer or HMSO President if they are aware of or suspect any violations of HMSO's legal or ethical standards or policies and procedures.

2. **Comply with Health Care Fraud and Abuse Laws.** Staff is required to comply with laws which prohibit health care fraud and abuse. Activities that are prohibited include, but are not limited to:

- Intentionally or knowingly making false or fraudulent claims for payment or approval;

- Offering or receiving remuneration (such as a kickback, bribe, or rebate) as an inducement to make a referral for the furnishing (or arranging for the furnishing) of any item or service; and
- Referrals by a physician of Medicare or Medicaid patients to any entity for "designated health services" when the physician or an immediate family member has a financial relationship with the entity (unless the arrangement complies with applicable legal exceptions).

3. **Follow All Antitrust Regulations.** HMSO is committed to complying with applicable antitrust laws. A number of activities engaged in by HMSO are subject to state and Federal antitrust laws. Generally, these laws prohibit agreements or actions that may illegally restrain trade or reduce competition. Examples of activities that violate these laws include, but are not limited to, agreements among competitors to fix or stabilize prices, inappropriate exclusive dealings, and boycotts of specified suppliers or customers.

4. **Adhere to Intellectual Property Laws.** HMSO is committed to adhering to all applicable intellectual property laws. All software used in connection with HMSO's business must be properly licensed and used in accordance with that license. Additionally, HMSO will respect the intellectual property and copyright laws regarding books, trade journals, magazines, and other applicable resources.

5. **Cooperate with Government Investigations.** HMSO and all Staff will cooperate with legally authorized government investigations related to HMSO business. If a person who identifies him or herself as a government investigator approaches a Staff member or the Staff member receives a subpoena or other written, official governmental request for information, the Staff member should contact the Compliance Officer or the President immediately. The Compliance Officer or President will help verify the credentials of the investigator, determine the legitimacy of the investigation and follow proper procedures for cooperating with the investigation. Staff must never destroy or alter any HMSO document or record in anticipation of a request for the document or record by a government agency or court. Never lie or make false or misleading statements to any government investigator. Never attempt to persuade any Staff member to provide false or misleading information or to fail to cooperate with a government investigation.

C. **Guidelines for Business Conduct.** HMSO and its Staff shall:

1. **Protect Confidential Information.** Staff will maintain the confidentiality of patient, personnel, and other proprietary information in accordance with applicable legal and ethical standards. Consistent with the Health Insurance Portability and Accountability Act Privacy Standards, Staff will not use, disclose, or discuss patient specific information with others unless it is authorized by the member or the member's personal representative or the use or disclosure is permitted by law. Staff will take care to assure that any proprietary or other confidential information maintained by HMSO is carefully managed and is not

shared or otherwise disclosed unless consistent with HMSO's policies and procedures. Staff may not use confidential information for their personal gain or benefit.

2. **Protect Access to Information Systems.** HMSO is committed to protecting all aspects of its information systems. All Staff and others with access to HMSO's computerized information system shall abide by HMSO's use policies, including the protection of confidential passwords and other access information.
3. **Avoid Conflicts of Interest.** It is the policy of HMSO to prohibit its Staff from engaging in any activity, practice, or act which conflicts with, or appears to conflict with, the interests of HMSO or its members. Staff must disclose to their supervisor, the President or the Compliance Officer any potential conflict of interest they or their immediate family have in any entity or organization which does business with HMSO or which competes with HMSO.
4. **Keep Accurate and Complete Records.** It is essential that HMSO report accurate information to governmental entities and other third parties. In order to meet this obligation, it is essential that every Staff member accurately and clearly report the relevant facts or the true nature of any transaction. Staff may not knowingly or with reckless disregard for the truth make any false or misleading statement on any form or to any other Staff member or auditor for HMSO. All patient records must meet the documentation standards required for quality care and reimbursement regulations. Any individual who contributes to the medical record must provide accurate documentation and never alter or destroy anything that is part of the official medical record. Travel and entertainment related expenses must be accurately documented and supported when seeking reimbursement from HMSO. Medical records and other business documents will be retained in accordance with state and Federal law.
5. **Appropriately Use HMSO Assets.** All Staff are charged with protecting and preserving HMSO's assets and resources by following procedures to prevent their loss, theft or unauthorized use.

II. REPORTING VIOLATIONS AND SEEKING COMPLIANCE GUIDANCE.

It is the responsibility of every Staff member to abide by HMSO's legal and ethical standards. All Staff are required to promptly report any potential violations of these standards or HMSO's policies or procedures. In the event that a Staff member has a question or concern and needs guidance on how to conduct their duties in compliance with HMSO's legal or ethic standards or believes that someone is conducting their business in an illegal, unethical, or otherwise questionable manner, or is violating HMSO's policies, the Staff member should first contact his or her supervisor to discuss the matter. There are times, however, when either the response received may be inadequate or the Staff member is uncomfortable in discussing the matter with his or her supervisor. In those cases, the Staff member should contact the Compliance Officer or the President. Staff will not be retaliated against in any manner for making reports as long as the

report is made in good faith and the information being reported is, to the best of their knowledge, truthful and complete.

ACKNOWLEDGEMENT

I certify that:

1. I have read and understand the Code of Conduct.
2. I agree to act in accordance with the Code of Conduct.
3. I will promptly report any conduct that I believe to be illegal or in violation of the Code of Conduct.
4. I will seek advice from my supervisor or the Compliance Officer concerning appropriate actions that I may need to take to ensure that I comply with Code of Conduct.
5. I understand that failure to comply with the Code of Conduct may result in disciplinary action, up to an including termination of employment or affiliation with HMSO..
6. I attest that all employees and staff at my clinic have read, understand and agree to act in accordance with the Code of Conduct.

Signature

Date

Print Name

Clinic

Relationship to HMSO (check all that apply):

_____ Employee

_____ Contracted Health Care Provider or Facility

_____ Board Member

_____ Volunteer

_____ Vendor/Agent: _____