

Corporate Compliance Plan 2017



Code of Conduct:

Upon employment, each employee is provided with the Code of Conduct, additionally all current employees shall be provided a copy of the Code of Conduct upon request or when any changes are made to the Code of Conduct. Each employee will acknowledge receipt of the Code of Conduct.

Community's successful business operations and reputation have been built upon a solid commitment to the principles of fair dealings and the ethical conduct of our employees. Our reputation for integrity and excellence requires we carefully observe the spirit of the letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity.

The continued success of Community is dependent upon our customers' trust. Community is dedicated to preserving that trust through our employees' commitment and duty to act in a way that will merit the continued trust and confidence of the public.

Community will comply with all applicable laws and regulations and expects its directors, officers and employees to conduct business in accordance with the letter, spirit and intent of all relevant laws and to refrain from any illegal, dishonest or unethical conduct.

Requirements of each employee, officer, director and delegate:

- Respect and protect the privacy of members, providers and fellow employees by maintaining Protected Health Information (PHI) and Personally Identifiable Information (PII), in strict confidence.
- Recognize the dignity of all people, be fair and impartial in business, and offer equal opportunity to everyone regardless of sex, race, color, creed, national origin or sexual orientation.
- Conform to all laws that apply to Community's business wherever it is conducted
- Display good judgment and high ethical standards in all business dealings.
- Conduct all Community business affairs with courtesy, honesty, fairness and integrity. These qualities are evidenced by truthfulness and the absence of deception or fraud or misrepresentation. Special attention should be paid to dealing with instances where payment is involved and to all coding matters.
- Refrain from providing or accepting gifts or any other thing of value where the intent or effect is to prejudice either Community or the recipient in favor of the donor.
- Understand the legal and ethical position of Community and its employees to avoid concerns regarding fraud and abuse arrangements or practices.
- Avoid deliberately creating, maintaining or submitting records, reports or statements that are inaccurate, false or misleading.
- Avoid establishing undisclosed or unrecorded funds or assets can be established. All items of income and expense and all assets and liabilities must be entered into financial records and must be accurately and adequately described. All reports submitted to governmental authorities must be accurate and complete and all transactions shall be executed in accordance with management's authorization.
- Maintain confidential information received for business purposes and not use the knowledge for personal gain or disclose to competitors, suppliers, contractors, other employees or any other unauthorized individuals. Employees may not use confidential information in a way that is not related to Community's business activities during and after their employment.
- Respect and protect the privacy of members and fellow employees by maintaining Protected Health Information (PHI) and Personally Identifiable Information (PII), in strict confidence.

- Avoid participation in activities that could conflict or appear to conflict with their responsibilities to Community. A conflict of interest occurs if an employee's activities or responsibilities are detrimental to the interest of Community or result in an improper or illegal gain from them. Employees may not realize any profit or gain as a result of their position with Community.
- Decline any gifts, loans or other special preferences from a person or organization that does or wants to do business with Community. The only exceptions are gifts of limited value extended as a business courtesy or appropriate business related expenses.
- Avoid providing gifts, loans or other benefits to a physician, potential member or client in order to obtain referrals or beneficial arrangements from clients or as an inducement to enroll in Community. Except as permitted under state and federal guidelines. Gifts to physicians, clients, members or potential members are appropriate only if the monetary value is modest; the benefit is part of marketing, educational or other ordinary business activity, and the benefit does not violate any applicable law. Occasional business meals or entertainment events are acceptable provided they are of reasonable cost and the business purpose is clearly documented. In the case of Medicaid and CHIP beneficiaries, it will not exceed the value set forth in regulations.
- Avoid the use of Community's funds for improper or illegal activities. There will be no payments to government officials to secure sales or obtain a favorable treatment. Gifts to or entertainment of government officials or employees are prohibited because these actions could be construed as attempts to influence government decisions. The only exceptions are gifts of limited value extended as a business courtesy or appropriate business related expenses.
- Report promptly actual or potential infringements of law, regulation, policy or procedure to Community's SIU and/or the Compliance Officer.

In general, the use of good judgment, based on high ethical principles, will guide an employee with respect to lines of acceptable conduct. If a situation arises where it is difficult to determine the proper course of action, the matter should be discussed openly with the immediate supervisor and, if necessary, with the Human Resources Department or Compliance Officer for advice and consultation.

It is the employee's duty and responsibility to report any suspected improper, unethical, or illegal activity to your immediate supervisor, Human Resources Manager, Community Corporate Compliance Officer, Community Hotline, or the Special Investigation Unit.

Compliance with this policy of business ethics and conduct is the responsibility of every Community employee. Disregarding or failing to comply with this standard of business ethics and conduct could lead to disciplinary action, up to and including possible termination of employment.

THIS SPACE INTENTIONALLY LEFT BLANK

Addendum: Code of Conduct – First Tier, Delegated & Related Entities (FDRs)

The following outlines Community's expectations of how our partners conduct business, and all who interact with the Community. The Code of Conduct is applicable to suppliers, vendors, contractors, consultants, agents and other providers of goods and services who do, or seek to do, business with the Community.

People

1. Encourage a diverse workforce and provide a workplace free from discrimination, harassment or any other form of abuse.
2. Respect human rights, consistent with local cultural norms, and prohibit all forms of forced or compulsory labor.
3. Establish an appropriate management process and cooperate with reasonable assessment processes requested by Community.
4. Provide safe and humane working conditions for all employees and contractors.

Performance

1. Comply with all applicable state and federal laws, rules, and regulations, including all applicable state and federal privacy laws, including HIPAA/HITECH Act, TDI, CMS, and HHSC guidance, where applicable.
2. Consistent with Community's policy as outlined in the Code of Conduct, pursue the ethical handling of actual or apparent conflicts of interest when conflicts or appearance of conflicts are unavoidable, including through full disclosure to Community, (DelegationOversight@Chchealth.org), any transaction or relationship that reasonably could be expected to give rise to a conflict.
3. Observe Community's policies regarding gifts and entertainment and conflicts of interest when dealing with the organization's associates, Medicaid and CHIP beneficiaries on Community's behalf.
4. Ensure no OIG or GSA excluded individuals or legal entities perform any function for Community.
5. Notify Community of any employee or contractor disciplinary actions taken as a result of a material compliance infraction.
6. Compete fairly for our business, without paying bribes, kickbacks or giving anything of value to secure an improper advantage.
7. Keep financial books and records in accordance with all applicable legal, regulatory and fiscal requirements and accepted accounting practices.
8. Promote, utilize and measure engagement of small and diverse suppliers as required under applicable Texas law.

THIS SPACE INTENTIONALLY LEFT BLANK