

Hope In-Home Care

CODE OF CONDUCT AND ETHICS

September 2014

Table of Contents

A MESSAGE FROM OUR DIRECTOR.....	3
INTRODUCTION TO THE CODE OF CONDUCT AND ETHICS.....	4
ELEMENT 1: QUALITY OF CARE	5
ELEMENT 2: COMPLIANCE WITH LAWS AND REGULATIONS.....	6
ELEMENT 4: BILLING AND CODING PRACTICES.....	8
ELEMENT 6: CONFLICTS OF INTEREST.....	10
ELEMENT 7: NON-RETALIATION AND DUTY TO REPORT	11
ELEMENT 8: COMPLIANCE RESPONSIBILITIES.....	12
CERTIFICATION AND ACKNOWLEDGMENT	13

A MESSAGE FROM OUR DIRECTOR

Hope In-Home Care has developed and adopted this *Code of Conduct and Ethics* to provide guidance on the standards of ethical business and care practices that guide our organization. Hope In-Home Care is committed to providing the highest quality of care to our patients. Hope In-Home Care strives to achieve this goal through compliance with all applicable laws, Government regulations, third-party payer requirements, and policies and procedures. To ensure that we fulfill this commitment while operating in a complex and highly regulated health care delivery environment, we have implemented a Company Compliance Program.

A key element of Hope In-Home Care's Compliance Program is our *Code of Conduct and Ethics*, which serves as the foundation of our Compliance Program. The *Code of Conduct and Ethics* is derived from our mission and guiding principles, and affirms the values and professional standards that already exist among our employees and colleagues. We are committed to following the *Code of Conduct and Ethics*.

Our success requires the active participation of every individual associated with our organization. **If you know or suspect that a law, regulation, policy, or our Code of Conduct and Ethics is not being followed, you should report this information.** The door is always open if you wish to report or discuss a concern.

To assist you in carrying out your compliance responsibilities, we have designated a Compliance Officer. You should reach out to that individual if you have any questions or concerns (compliance@hopeinhomecare.org). In addition, if you prefer, you may call our dedicated Compliance Hotline to report a concern or make a complaint on a confidential basis. The phone number of the Hotline is 1-855-252-7606, and the internet address is:

<https://www.complianceresource.com/products/hotline-service-center/>.

Calls to the Hotline can be made anonymously. However, I can assure you that management will not tolerate retaliation for good faith reporting of issues or concerns to anyone in management, the Company Compliance Officers, or the Hotline.

I pledge my commitment to upholding the *Code of Conduct and Ethics* and implementing an effective Compliance Program. I am convinced that our compliance efforts are critical to providing high quality services to our patients.

Sincerely,

Vipul Patel
Director

INTRODUCTION TO THE CODE OF CONDUCT AND ETHICS

Hope In-Home Care is committed to serving our patients in an ethical, legal, and responsible manner, consistent with our organization's mission and values. We strive to provide high quality services in compliance with all applicable laws, regulations, and guidelines, as well as Hope In-Home Care's policies and procedures. Hope In-Home Care recognizes its obligation to comply with requirements related to participation in Federal health care programs (e.g., Medicare and Medicaid), including the submission of accurate and complete claims and bills.

The *Code of Conduct and Ethics* contains the following 8 elements:

Element 1: Quality of Care

Element 2: Compliance with Laws and Regulations

Element 3: Work Place Integrity

Element 4: Billing, Coding, and Records Integrity

Element 5: Protection and Use of Information, Property, and Assets

Element 6: Conflicts of Interest

Element 7: Non-Retaliation and Duty to Report

Element 8: Compliance Responsibilities

The *Code of Conduct and Ethics*, as well as all laws, regulations, guidelines, and Hope In-Home Care's policies and procedures should be observed by everyone in our work environment or acting on behalf of the organization. No one, regardless of position, will be allowed to compromise adherence to the *Code of Conduct and Ethics*, laws, regulations, business standards, policies, or procedures. Failure to comply with the *Code of Conduct and Ethics*, or applicable laws, regulations, policies, and procedures can result in serious damage to our standing with our patients, legal or regulatory action against the organization and/or individual employees, and disciplinary action (including termination of employment).

If you have any questions about the *Code of Conduct and Ethics* or about any policies or practices of Hope In-Home Care, you should raise the questions to a manager or supervisor, or the Compliance Officer, who may be reached at compliance@hopeinhomecare.org. Our Compliance Officer is charged with being available and responsive to employees when questions arise about adherence to the *Code of Conduct and Ethics*.

The *Code of Conduct and Ethics* adopted by Hope In-Home Care is intended to ensure that we meet our compliance goals in today's health care and business environment, as well as to provide high quality services. The *Code of Conduct and Ethics* is designed to provide general guidance, and supplement other policies and procedures of Hope In-Home Care.

ELEMENT 1

QUALITY OF CARE

We are committed to providing high quality care and services. Our first responsibility is to our patients and their families.

- ◆ We strive to provide the best level of care possible to patients.
- ◆ We will provide quality care and services consistent with the philosophy that all aspects of patient care are to be taken seriously.
- ◆ We will respect the dignity of each patient by responding to all patient questions, concerns, and needs in a timely and sensitive manner.
- ◆ We will treat every patient with respect and compassion at all times.
- ◆ We will not discriminate against a patient for any reason including race, color, sex, national origin, age, disability, or any other classification protected by law.
- ◆ We will maintain the confidentiality of patient medical records consistent with all laws and professional standards.
- ◆ We will follow all applicable laws regarding patient rights and protected health information.

ELEMENT 2

COMPLIANCE WITH LAWS AND REGULATIONS

We are committed to maintaining high standards of business and professional integrity. We will provide patient care and conduct business in accordance with all applicable laws, regulations, and policies.

- ◆ We will promptly report to Management, the Company Compliance Officer, or the Compliance Hotline whenever a possible violation of law, regulation, or policy has occurred. All compliance issues or reported concerns will be acted upon in a fair and prompt manner.
- ◆ We will not tolerate any retaliation or other negative action against an employee who in good faith reports a suspected violation or concern in good faith.
- ◆ We will not provide or accept kickbacks, bribes, rebates, or anything of value in order to influence or arrange for the referral of patients and services covered and payable by a Federal health care program.
- ◆ We will ensure that all agreements with an individual or organization that may be a referral source or generate referrals are in writing and approved by appropriate management and legal counsel prior to execution.
- ◆ We will bill patients and third-party payers in accordance with applicable laws, regulations, policies, and procedures.
- ◆ We will strive to ensure that complete and accurate patient medical records are maintained in accordance with Federal and state privacy and security laws, regulations, and policies.
- ◆ We will ensure that confidential patient information is accessible only to health care personnel involved in the patient's care, third party payers, and others authorized to review patient information.
- ◆ We will not hire or contract with individuals or entities that have been sanctioned by the Office of Inspector General (OIG) of the U.S. Department of Health and Human Services, e.g., excluded from participation in Federal health care programs, or barred from a state health care program, e.g. Medicaid.
- ◆ We will expect all employees and contractors to be familiar with applicable laws, regulations, and policies governing their area of work and responsibilities.

ELEMENT 3

WORK PLACE INTEGRITY

We recognize that our employees are our most valuable asset. We are committed to creating a work place where employees are treated with respect and fairness while empowered to get the job done at or above expectations.

- ◆ We will provide a work environment for all those associated with Hope In-Home Care that is free from harassment and intimidation. We will not tolerate verbal, physical, or sexual harassment.
- ◆ We will make all employment and promotion decisions without regard to race, color, sex, national origin, age, disability, or any other classification protected by law.
- ◆ We will continually strive to build confidence and professionalism in every employee.
- ◆ We will maintain open lines of communication so that the views of each employee may be considered and their opinions given proper respect.
- ◆ We will show respect and consideration for one another, regardless of status or position.
- ◆ We will apply the *Code of Conduct and Ethics* and personnel policies to all employees regardless of position in the work place.
- ◆ We will provide reasonable training opportunities to assist employees in building and maintaining their professional skills.
- ◆ We are committed to maintaining a work place that protects the health and safety of our patients and employees. We will report to appropriate management staff any practice that may violate a safety standard.
- ◆ We will not tolerate any work place violence, including threats, harassment, or bullying toward an individual. Possession of weapons in the workplace is prohibited.
- ◆ The manufacture, sale, possession, distribution, or use of illegal drugs while working will not be permitted. We will not tolerate any individuals working under the influence of illegal drugs or alcohol.
- ◆ We will comply with Federal, state, and local laws, regulations, and rules that promote the protection of health and safety.
- ◆ We will familiarize ourselves and comply with the contents of the *Code of Conduct and Ethics*, as well as with policies and procedures applicable to the employment and responsibilities at Hope In-Home Care.

ELEMENT 4

BILLING AND CODING PRACTICES

We shall promote the preparation and maintenance of timely and accurate patient records, and billing for rendered services as documented in a patient's medical records.

- ◆ We will promote the correct coding and billing for services as provided and documented in a patient's medical record.
- ◆ We will ensure that claims submitted for payment are properly coded, documented, and billed in accordance with all applicable laws and regulations.
- ◆ We will not knowingly submit, or cause to be submitted, for payment or reimbursement a claim that we know to be false, fraudulent, or fictitious.
- ◆ We will promote the periodic review of bills, reimbursement, and medical records to ensure compliance with applicable billing, coding, and documentation requirements.
- ◆ We will promote the regular review of records relating to credit balances and promptly refund any overpayments.
- ◆ We will promote timely and complete preparation and maintenance of medical documentation and billing records in a manner consistent with applicable laws and regulations.
- ◆ We will promote the disclosure to third party payers (and patients) of any errors in billing, and refund any money received to which we are not entitled.
- ◆ We will promote the reporting and refunding of any identified overpayments made by Federal health care programs within 60 days of identification and verification.
- ◆ We will not promote the routine waiver of third party payer patient cost-sharing, e.g., deductibles and co-payments.
- ◆ We will not alter or prematurely destroy any document in response to, or in anticipation of, a request for those documents by any Government agency or court.
- ◆ We will respond to all questions and complaints related to a patient's bill in a direct, truthful, and timely manner.

ELEMENT 5

PROTECTION AND USE OF INFORMATION, PROPERTY, AND ASSETS

We are committed to protecting Hope In-Come Care's property and information against loss, theft, destruction, and misuse.

- ◆ We will correctly use and care for all property and equipment entrusted to us.
- ◆ We will maintain and inventory supplies and fixed assets, and keep them secure.
- ◆ We will respect the property and possessions of a patient, and not engage in any unauthorized use.
- ◆ We will not make unauthorized copies of computer software or use unauthorized software on Hope In-Home Services' or a patient's computer equipment.
- ◆ We will not communicate or transfer any information or documents to any unauthorized persons.
- ◆ We will honor the privacy of patients and not reveal or discuss patient-related information except with health care personnel involved in the patient's care, payment of services, or other reasons directly related to care or payment.
- ◆ We will not use computers, software, e-mail, facsimile machines, and other technology to communicate information to unauthorized individuals. Further, the use of technology to send offensive, discriminatory, or harassing messages is prohibited.
- ◆ We will safeguard the use and disclosure of protected health information, including information related to treatment, medical history, current health status, payment for treatment and other information contained in patient records, in accordance with the Health Insurance Portability and Accountability Act (HIPAA) privacy and security regulations, state laws, and Hope In-Home Care's policies and procedures

ELEMENT 6

CONFLICTS OF INTEREST

We are committed to acting in good faith in all aspects of our work. We will avoid conflicts of interest or the appearance of conflicts between the private interests of any employee and her or his work duties.

- ◆ We will exercise good faith and fair dealing in all transactions that involve our responsibilities to Hope In-Home Care.
- ◆ We will devote our attention and activities solely to Hope In-Home Care and its patients during our scheduled hours of work.
- ◆ We will not engage in any activity, practice, or act that creates an actual or apparent conflict of interest with Hope In-Home Care.
- ◆ We will report an actual or perceived conflict of interest to Hope In-Home Care management.
- ◆ We will not abuse or misuse our position for personal and improper gain.

ELEMENT 7

NON-RETALIATION AND DUTY TO REPORT

We will report concerns about actual or potential wrongdoing without the fear of retaliation.

Hope In-Home Care has adopted a broad Non-Retaliation Policy to protect employees who report their concerns. No disciplinary action or retaliation will be taken when you report a perceived issue, problem, concern, or violation to management, the Company Compliance Officer, or the Compliance Hotline “in good faith.” The “in good faith” requirement means an employee actually believes or perceives the information reported to be true. We value each individual. Everyone has the right to be treated fairly and with respect.

How to Report Concerns

Hope In-Home Care encourages employees to report concerns. You may report concerns as follows:

Step 1: Discuss the question or concern with your direct supervisor. Your direct supervisor is most familiar with the laws, regulations, and policies that relate to your work.

Step 2: If you are not comfortable with talking to your supervisor or feel you did not receive an adequate response, contact your supervisor’s manager or another member of the management team.

Step 3: Contact the Company Compliance Officer at compliance @hopeinhome care.org

Step 4: Contact the Compliance Hotline at 1-855-252-7606 or submit a report online at <https://www.complianceresource.com/products/hotline-service-center/>. The Company Compliance Officer will review and address all reports made to the Compliance Hotline.

ELEMENT 8

COMPLIANCE RESPONSIBILITIES

RESPONSIBILITY OF EMPLOYEES

All employees are expected to follow all laws, regulations, and policies. Anyone who knows about or suspects a violation must report this information. If an employee does not report a violation, he/she may be subject to disciplinary action even if not directly involved. Reporting does not protect an employee from disciplinary action regarding his/her own performance or conduct, but their honesty in reporting will be considered.

RESPONSIBILITY OF MANAGEMENT

Management is expected to demonstrate a commitment to ethical and legal behavior that is consistent with Hope In-Home Care's mission and Company's Compliance Program. Management is responsible for maintaining an environment that stresses a commitment to compliance with the *Code of Conduct and Ethics* and with laws, regulations, and policies, as well as prohibits retaliation or reprisals against employees who report actual or suspected compliance violations. A supervisor or manager has an obligation to ensure that employees:

- ◆ Receive, read, and understand the *Code of Conduct and Ethics*;
- ◆ Understand their affirmative duty to report actual or suspected *Code of Conduct and Ethics* violations;
- ◆ Know about and follow all laws, regulations, and policies within the scope of their responsibilities;
- ◆ Know the procedures for reporting suspected or actual violations; and
- ◆ Encourage others to ask questions and to report actual or suspected violations.

If an employee comes to you with a question regarding compliance with a law, regulation, or policy, you are responsible for:

- ◆ Taking steps to ensure the employee does not fear or experience retaliation;
- ◆ Maintaining the employee's confidentiality;
- ◆ Collecting accurate information regarding the employee's report;
- ◆ Pursuing the right process so that reports of violations or suspected violations can be further investigated; and informing the employee that you have followed through on his or her report.

CERTIFICATION AND ACKNOWLEDGMENT

I have received and read the Hope In-Home Care *Code of Conduct and Ethics*. I understand that the *Code of Conduct and Ethics* applies to my employment/contract with Hope In-Home Care and that following all laws, regulations, policies, and the *Code of Conduct and Ethics* are conditions of my employment/contract. I will seek advice from Hope In-Home Care's managers, the Company Compliance Officers, or contact the Compliance Hotline with any compliance questions or concerns.

My signature below reflects that I have received, and will read and follow the Hope In-Home Care's *Code of Conduct and Ethics*.

Employee/Contractor Signature

Employee/Contractor Printed Name

Date