



**To all Team Members, Volunteers, Contractors, and Members of the Governing Board**

At CommUnityCare Health Centers we take seriously our commitment to being responsible and ethical and each of us is a vital part of that effort.

I ask your help in pledging to promote an ethical and safe environment in everything we do. We are responsible for our own individual actions and choices and we are also often in positions to observe the impact of decisions beyond our control.

While I believe unethical actions do not characterize our organization, I do want to ensure that each of us is aware of CommUnityCare's enclosed Code of Conduct.

The goal and the purpose of our Code of Conduct is to ensure the integrity of CommUnityCare as an accountable healthcare provider and integral part of our community. To that end, it is imperative that each of us work individually and collectively to further our reputation as a high quality and ethical community based health care organization and to at all times conduct ourselves with the highest of integrity.

Compliance with our Code of Conduct requires that we all "do the right thing" and our Code of Conduct document is your guide as an individual professional and valued member of CommUnityCare's team.

Thanks for your attention in the most important matter and for you great work in improving the health and well-being of our patients and the communities we serve.

A handwritten signature in black ink, appearing to read "Jaeson T. Fournier", written over a horizontal line.

Jaeson T. Fournier, DC, MPH  
President and Chief Executive Officer



## Code of Conduct

### VISION

Improve the health of the community by increasing access to the best care possible.

### MISSION

We will work with the community as peers with open eyes and a responsive attitude to provide the right care, at the right time, at the right place.

### GOALS

- Expand Access
- Improve Patient Experience
- Improve Quality
- Improve Efficiency / Productivity
- Become Employer of Choice

### CORE VALUES

- **Respect** – We treat our patients and peers with dignity and embrace diversity.
- **Integrity** – We are honest and sincere, doing what is right, not what is expedient.
- **Dependability** - We are accountable and strive to exceed expectations.
- **Teamwork** – We work together, promote cooperation, and value the opinions of patients and peers.
- **Quality** – We strive for excellence in all that we do.



## Code of Conduct

The following Code of Conduct expresses standards that at a minimum are expected of each individual at CommUnityCare, including team members, volunteers, contractors and members of the Governing Board. Team members in violation of the Code of Conduct may be subject to discipline or termination of employment. Volunteers in violation of the Code of Conduct may be unable to continue to provide volunteer services at CommUnityCare. Contractors in violation of the Code of Conduct may be required to develop and implement a corrective action plan or the contract may be terminated by CommUnityCare. Governing Board members in violation of the Code of Conduct may be removed from the Governing Board in accordance with the Governing Board Bylaws.

Every team member, volunteer, contractor, and Governing Board member will sign a Code of Conduct Acknowledgment upon employment, engagement, or affiliation and annually thereafter.

### **1. Be honest**

Everyone is expected to be honest while performing their job duties and participating in activities related to CommUnityCare. This includes being honest during investigations. Failure to be honest is cause for disciplinary action, up to and including termination of employment or affiliation.

### **2. Follow CommUnityCare Policies and Procedures**

CommUnityCare is governed by federal, state and local laws, rules, regulations and guidelines as well as professional standards, policies, and operating procedures. CommUnityCare is committed to compliance with all of these requirements and with any recommendations that further the organization's goals. It is your duty, as a valuable member of CommUnityCare, to also comply with the applicable requirements and adopted recommendations.

All policies and procedures, including those specifically referenced below, are made available and accessible to employees on CommUnityCare's internal website. Contractors will be provided access to relevant policies and procedures in their scope of work. It is the responsibility of all CommUnityCare individuals to review policies and procedures applicable to their duties, including any revisions thereof. Compliance with all policies and procedures, and applicable laws is a condition of continued employment or affiliation with CommUnityCare.

Any questions or issues regarding compliance with policies, procedures, rules, regulations or the standard of care should be immediately brought to the attention of a Team Leader up the chain of command, the Compliance Officer, the Chief Executive Officer or the Chairman of the Board if the issue involves the Board or an individual Board Member.



## Code of Conduct

### **3. Keep accurate and timely records**

All actions and transactions, whether medical, financial, operational, or administrative, must be accurately documented, on a timely basis, in accordance with CommUnityCare policy and procedures, and in a manner consistent with federal and state requirements. Medical charts must be completed thoroughly, accurately and as promptly as possible.

Falsifying business or patient records or failing to document appropriately is cause for disciplinary action up to and including termination of employment or affiliation. Falsifying government records also carries civil and criminal penalties for the organization and/or individual involved.

*Reference: Central Health and CommUnityCare policy HR 2-008, Standards of Conduct.*

### **4. Protect CommUnityCare Assets**

CommUnityCare property and facilities, equipment and supplies, personnel time, documents, records and accounts receivable (or monies due to CommUnityCare for any purpose) are assets of CommUnityCare. You are expected to respect, maintain and protect CommUnityCare assets. CommUnityCare assets are not to be used or applied for any personal purpose. This includes the use of computers, supplies, staff time, accessing patient records, business records, cash or cash equivalents.

Any assets removed from CommUnityCare must be accounted for, used solely for CommUnityCare business, and returned in good condition.

Waste of staff time is a waste of CommUnityCare assets. Use your time effectively when performing duties or services for CommUnityCare.

You are responsible for protecting CommUnityCare assets, conserving resources and reporting the inappropriate use of assets to a Team Leader up the chain of command, the Compliance Officer or the Chief Executive Officer.

### **5. Respect patients and staff rights**

All persons at CommUnityCare, including patients, team members, and other individuals, are to be treated with dignity and respect.



## **Code of Conduct**

Verbal, sexual, physical or emotional harassment of any individual is not tolerated. Harassment results from lack of respect of others and violates CommUnityCare basic values. If you experience harassment or are aware that another person has experienced harassment, report the incident or occurrence immediately to Chief Human Resources Officer or the Compliance Officer.

CommUnityCare policies and procedures prohibit discrimination on the basis of age, race, color, religion, sex, national origin, citizenship status, gender, gender identity or expression, sexual orientation, disability, marital status, political affiliation, disability, veteran status, social or economic status including source of payment or ability to pay or any other protection under law. The prohibition applies to all CommUnityCare staff, agents or representatives and patients. If you feel that you or another individual has been discriminated against, report your concerns to Chief Human Resources Officer or the Compliance Officer.

Failure to treat patients in a respectful and appropriate manner is cause for corrective or disciplinary action up to and including termination of employment or affiliation.

*Reference: Central Health and CommUnityCare policies: HR 1-004, Equal Employment Opportunity; HR 1-005, Policy Against Harassment; and HR 2-008, Standards of Conduct.*

### **6. Do not accept or offer gifts or gratuities**

If an individual wishes to make a gift or contribution to CommUnityCare, refer them to the Compliance Officer or the Chief Executive Officer for consideration and review of the proposal, and so arrangements may be made to accept or decline the gift on behalf of CommUnityCare.

Inappropriately accepting or offering prohibited gifts is cause for corrective or disciplinary action up to and including termination of employment or affiliation.

*Reference: CommUnityCare policy CO-CO 04, Conflict of Interest.*

### **7. Do not offer, solicit or accept bribes or kickbacks**

Offering, soliciting or accepting a bribe or remuneration to induce or reward referrals is inappropriate, illegal, unethical, and strictly prohibited by CommUnityCare. Remuneration includes anything of value and can take many forms besides cash (e.g. free rent, hotel stays, meals and excessive compensation for medical directorships or consultancies).

Offering, soliciting or accepting any sort of bribe or remuneration is cause for immediate termination, and may subject the team member to criminal charges.



## Code of Conduct

If you have any question concerning a potential offer, solicitation or other arrangement, check immediately with the Compliance Officer.

### 8. Avoid conflict of interest

A “conflict of interest” occurs when the interests of one party, such as a team member, may influence or appear to influence that person’s ability to be objective in decision-making, affecting job performance or resulting in personal gain.

If you are in a situation that you believe or anticipate may be perceived as a conflict of interest, contact the Compliance Officer. You are expected to disclose any actual or potential conflict of interest to the Compliance Officer for proper assessment and determination.

An undisclosed conflict of interest may be cause for corrective or disciplinary action up to and including and termination of employment or affiliation.

*Reference: Central Health and CommUnityCare policies: HR 2-014, Outside Employment; and, CO-CO 04, Conflict of Interest.*

### 9. Standards of Conduct

All CommUnityCare team members, volunteers, contractors, and Governing Board members, must agree to follow the Standards of Conduct as provided in the **Central Health and CommUnityCare policy HR 2-008**. CommUnityCare will not tolerate conduct that interferes with operations, discredits CommUnityCare, or is offensive to or harms patients, coworkers, or other individuals.

### 10. Authority to Make Business Decisions

CommUnityCare team members, volunteers, contractors, and Governing Board members do not have the authority to act as a representative of CommUnityCare in business transactions with other entities without consulting and obtaining prior approval from CommUnityCare’s Senior Leadership Team.

### 11. Report Violations

You are required to report any concerns or suspicions related to the issues addressed in this Code of Conduct, including concerns about any activity related to CommUnityCare that you believe may be a violation of federal, state, or local law, rules or regulations, or CommUnityCare policy, procedures or standards.



## Code of Conduct

Depending upon the nature of your concern you may start by reporting to a Team Leader up the chain of command, the Compliance Officer, the Chief Executive Officer, or through the anonymous Compliance Alert Line at (512) 978-9917.

Failure to report, as required, may be cause for corrective or disciplinary action up to and including termination of employment or affiliation.

*Reference: Central Health and CommUnityCare policy HR 2-008, Standards of Conduct.*

### 12. Confidentiality Agreement

You agree to the following:

- A. You will use protected health information (PHI), sensitive business information, and employee personal information only as needed to perform your legitimate duties through your association with CommUnityCare. This means, among other things, that:
  - You will only access PHI and other confidential information that is necessary for the performance of my duties;
  - You will not in any way divulge, convey, copy, release, sell, loan, review, alter or destroy any confidential information, except as properly authorized by CommUnityCare;
  - You will not misuse or be careless with PHI or other confidential information.
- B. You will not disclose PHI or sensitive information to any persons outside of CommUnityCare.
- C. You will report activities that you suspect may compromise the confidentiality of PHI or other sensitive information. (Reports made in good faith about suspect activities will be held in confidence to the extent permitted by law, including the name of the individual reporting the activities and shall not be subject to retaliation.)
- D. You understand that your obligations for maintaining confidentiality of PHI and other sensitive information maintained by this practice will continue after termination of your association with CommUnityCare.
- E. You understand that you have no right or ownership interest in any PHI or otherwise protected information referred to in this agreement. CommUnityCare may at any time revoke your access to confidential information. You will safeguard and retain the confidentiality of all PHI and sensitive information.



## Code of Conduct

- F. You will be legally responsible for any misuse or wrongful disclosure of confidential information and for your failure to safeguard your means of access to confidential information. You understand that your failure to comply with this agreement may also result in my loss of employment and/or legal liability.
- G. You understand violation of confidentiality laws may subject the individual to liability. Unauthorized disclosure of confidential CommUnityCare or patient information is cause for corrective or disciplinary action up to and including termination of employment or affiliation.

### ***What to report?***

You are required to report a matter or incident if you have any questions about the possibility of or believe that it may involve an illegal or unethical act or omission, or violation of the Code of Conduct.

### ***What not to report?***

CommUnityCare takes all reports of potential violations seriously. An individual should not report anything falsely or maliciously. Reports of non-compliance that are known to be false will be subject to disciplinary action up to and including termination of employment or affiliation. However, if an individual reports incorrect information in good faith, the reporting individual is protected from reprisal.

If you are not sure about whether to report a particular concern, discuss your concern with a Team Leader, the Compliance Officer, or the Chief Executive Officer to receive guidance concerning compliance with reporting requirements.





## Code of Conduct

### Acknowledgement

All team members, volunteers, contractors, and members of the Governing Board of CommUnityCare are required to be familiar with the Code of Conduct and must agree to abide by that Code. The following is an acknowledgment of that requirement. For the purpose of the Code of Conduct document, "individual" or "everyone" refers to CommUnityCare team members, volunteers, contractors, and members of the Governing Board.

I verify that I have read and understand the contents of the Code of Conduct. If I do not understand any part of the contents of the Code of Conduct, I will contact the CommUnityCare Compliance Officer or her designee.

I agree to abide by and comply with the standards in the Code of Conduct. I also agree to abide by all Central Health and CommUnityCare policies and procedures, as well as all federal, state, and local laws, rules and regulations. I understand that my compliance is a condition for my continued employment or association with CommUnityCare.

I understand that it is my duty and responsibility to report illegal, unethical, or activities that are non-compliant with laws, regulations, or CommUnityCare policies and procedures, to the Compliance Officer or the Chief Executive Officer and that my failure to report may result in appropriate disciplinary action, up to and including termination.

I certify that I will report to the Compliance Officer or the Chief Executive Officer any illegal, unethical, or non-compliant activities that I am either aware of or suspect.

I also understand that I am prohibited from releasing or disclosing **any** information concerning the identity of patients, services provided, or confidential information to the patients of CommUnityCare.

I understand that I am prohibited from releasing or disclosing **any** medical, personal, or confidential information about a team member or former team member. Job reference inquiries shall be directed to site administration or Human Resources.

Disclosure of confidential information is cause for termination from employment or association and may result in liability for the individual disclosing the information.

I understand that this Acknowledgement will be placed in my personnel file.

\_\_\_\_\_  
Signature

\_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_  
Date

\_\_\_\_\_  
Print Name