



To all CommUnityCare Team Members (directly employed and contracted employees, Officers, Board Members, and Agents - collectively "Team Members").

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 wonderful 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 protect CommUnityCare Health Centers' status as an accountable and trusted healthcare provider that is worthy of the resources we are entrusted with. 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 for each of us to conduct ourselves with the highest of integrity at all times.

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

A handwritten signature in blue ink that reads "Jaeson T. Fournier". The signature is written over a faint, light blue watermark of the CommUnityCare logo and the text "CommUnityCare HEALTH CENTERS".

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



Code of Conduct

VISION

Striving to achieve health equity for all by: (1) being the health care home of choice; (2) being a teaching center of excellence; and, (3) providing the right care, at the right time, at the right place.

MISSION

To strengthen the health and well-being of the communities we serve.

CORE VALUES

- Integrity – Doing the right thing in the right way for the right reason.
- Mastering Excellence – Committed to developing and implementing best practices in all areas to ensure quality, efficiency, and safety for everyone.
- People First – Creating a welcoming environment by being compassionate and caring towards all.
- Accountable – Taking and supporting personal and professional responsibility for our actions and by following through on what we promise.
- Community – Connecting to and being advocates to ensure high quality, accessible, and equitable care in the communities we serve.
- Transforming – Continually expanding our knowledge base and the care we deliver by engaging in innovative research and teaching programs.

The following Code of Conduct expresses standards that at a minimum are expected of each individual at CommUnityCare, including team members (directly employed and contract employees, volunteers, and members of the Governing Board – collectively “Team Members”). 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, and Governing Board member must sign the Code of Conduct Acknowledgment upon employment, engagement, or affiliation and annually thereafter.

Team members are required to report any actual or suspected violations of this Code of Conduct. 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



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affiliation. However, if an individual reports incorrect information in good faith, the reporting individual is protected from reprisal.

Any questions or concerns arising under the Code of Conduct should be directed to the Compliance Officer at 512-978-9040.

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.

2. Follow 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. Team members have a duty to comply with all applicable requirements and with any recommendations that further the organization's goals.

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.

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 contemporaneously.

Falsifying business records (including patient records), failing to document appropriately or withholding pertinent information 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 HR Manual: 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. Team members are expected to respect, maintain and protect CommUnityCare assets. CommUnityCare assets are not to be used or applied for any personal



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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. Team members must use their time effectively when performing duties or services for CommUnityCare.

Team members 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 the rights of all persons, including patients, staff, and vendors.

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

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 a team member experiences harassment or is aware that another person has experienced harassment, he/she must report the incident or occurrence immediately to the Director of Human Resources or Chief Human Resources 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, 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 a team member feels that his/her or another individual has been discriminated against, he/she must report concerns to the Vice President of Human Resources, Human Resources Manager, or Senior HR Generalist.

Reference: [Central Health and CommUnityCare HR Manual: HR 1-004, Equal Employment Opportunity Employer; HR 1-005, Anti-Harassment & Retaliation; and HR 2-008, Standards of Conduct.](#)

6. Do not provide direct payments to patients.

CommUnityCare offers a variety of support services through contracts and vouchers with third party organizations. In no circumstance should a team member provide direct payments to patients for any of these services. This also prohibits the use of monetary funds as incentive for participation in care services.



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7. Use federal funds in accordance with federal, state and local regulations.

CommUnityCare receives federal dollars to support our care services and as a recipient of federal funds we are required to adhere to the following regulatory guidelines:

- We may not spend federal funds in support of lobbying. This includes: influencing an officer or employee of any agency or Congressional member/staff regarding federal awards; failing to submit required certification and disclosure forms (i.e., SF-LLL); using grants funds provided to non-profit organizations or institutions of higher education to influence an election, contribute to a partisan organization, or influence enactment or modification of any pending federal or state legislation; advocating or promoting any proposed, pending or future Federal, State or local tax increase, legal consumer product, including but not limited to the advocacy or promotion of gun control; or expending federal funds to influence federal, state, or local officials or legislation.
- We may not use federal grant funds for salary expenditures in excess of the federal salary cap.
- We acknowledge federal grant funding in documentation describing projects or programs funded in whole or in part with federal grant dollars. The description includes: the percentage of the total costs of the program or project which will be financed with federal money; the dollar amount of federal funds for the project or program; and percentage and dollar amount of the total costs of the project or program that will be financed by nongovernmental sources (Division H, Title V Section 505.5).
- We do not fund abortion in any way, as outlined in the Bulletin, and further by Texas state prohibitions on abortion services (Texas Administrative Code §382.19, §382.117, Texas Family Code §33.001). When an exception to federal restriction on abortion applies, it is permissible for CommUnityCare staff to affirmatively support the referral of a pregnant women to another medical facility for abortive services. When this exception applies, CommUnityCare staff must follow the guidance for obtaining documentation for the referral as outlined in CommUnityCare's policy [CO-CO 05, Women's Reproductive Health Services](#).
- We do not participate in Human Embryo Research and we do not fund Human Embryo Research.
- We do not use federal grant funds to promote the legalization of controlled substances.
- Federal grant funds are not used to purchase or distribute sterile needles for the injection of illicit drugs.
- We ensure our computer networks are secured to prevent the viewing, downloading, or distribution of pornography.
- We do not make our federal funds available to the Association of Community Organizations for Reform Now (ACORN) or any of its affiliates, subsidiaries, allied organizations, or successors, as outlined in Division H, Title V Section 522.
- We do not prohibit employees or contractors from reporting fraud, waste, or abuse, and we do not utilize confidentiality agreements that discourage such reporting.



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Reference: [HRSA Policy Bulletin 2021-03E](#).

8. Do not offer, solicit or accept bribes or kickbacks.

Offering, soliciting or accepting a bribe or remuneration to induce or reward referrals is illegal 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).

9. Avoid conflicts 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.

Team members must abide by CommUnityCare’s conflict of interest guidelines, which include completing a disclosure statement upon employment, engagement, or affiliation and annually thereafter. Team members are also expected to disclose any actual or potential conflicts of interest as they arise to the Compliance Officer for proper assessment and determination. Individuals with a real or apparent conflict of interest with a given contract are prohibited from participating in the selection, award, or administration of a contract procured and paid for in whole or in part by a federal award.

Additionally, team members are expected to be impartial to ensure fair and competitive access to procurement by responsible vendors and to foster public confidence in the integrity of CommUnityCare’s procurement process. Team members shall avoid any activity (either business or professional) and incurring any obligation that would cause a conflict with, compromise, or give the perception of compromising the integrity of CommUnityCare. Examples of the types of activities to be avoided include accepting gratuities (gifts, cash, meals, loans) of any kind valued at more than Fifteen Dollars (\$15) each or multiple gifts or favors with a cumulative value in excess of Seventy-five Dollars (\$75) in a year from current or potential vendors; using confidential proprietary information for actual or anticipated personal gain; or disclosing a vendor's confidential proprietary information inappropriately to other vendors during the procurement process.

Reference: Central Health and CommUnityCare policies: [HR 2-014, Outside Employment](#); [CO-CO 04, Conflict of Interest](#); [ADMIN-FIN SOP 13, Procurements less than \\$50,000](#); [ADMIN-FIN SOP 14, Procurements \\$50,000 and Greater](#).

10. Do not act as an authorizing official for CommUnityCare.



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CommUnityCare team members, volunteers, contractors, and Governing Board are not authorizing officials of CommUnityCare and must consult with CommUnityCare's Chief Executive Officer prior to entering into business transactions with other entities.

11. Report violations or misconduct.

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

Depending upon the nature of the concern team members may start by reporting to a Team Leader up the chain of command, the Compliance Officer at 512-978-9040, the Chief Executive Officer, through the anonymous Compliance Hotline at (833) 860-0008 or by visiting www.lighthouse-services.com/communitycaretx.

Reference: [Central Health and CommUnityCare HR Policy Manual HR 2-008, Standards of Conduct; CO-CO 03, Reporting Compliance Concerns and Non-Retaliation.](#)

12. Maintain confidentiality.

Team members will use protected health information (PHI), confidential, sensitive and privileged business information only as needed to perform legitimate duties at CommUnityCare. This means, among other things, that PHI and other confidential or sensitive information will only be accessed to the extent necessary to perform work duties and that confidential information will not in any way be divulged, conveyed, copied, released, sold, loaned, reviewed, altered or destroyed except as properly authorized by CommUnityCare.

Team members will not disclose PHI or sensitive information to any unauthorized persons outside of CommUnityCare. Team members are legally responsible for any misuse or wrongful disclosure of confidential information and for their failure to safeguard their means of access to confidential information. The duty to maintain confidentiality of PHI and other sensitive information continues after termination of an individual's association with CommUnityCare.

CommUnityCare retains the right and ownership interest in any PHI or otherwise protected information referred to in this agreement. CommUnityCare may at any time revoke an individual's access to confidential information.

Reference: [CO-CO 10, HIPAA Privacy and Breach Notification; CO-CO 11, HIPAA Security Manual; CO-CO SOP 04, Handling Confidential or Sensitive Information.](#)



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Acknowledgement

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.

Signature

_____/_____/_____
Date

Print Name