

August 2020

Code of Conduct Training



HealthCare Partners, IPA
HealthCare Partners, MSO

This document and the information contained within is proprietary and confidential information of HealthCare Partners, IPA and Healthcare Partners, MSO (collectively known as HCP). Use of this document is strictly reserved for HCP's Workforce, HCP contracted providers and their staff, and our first-tier, downstream, and related entities.

This document may not be reproduced, copied in whole or in part, adapted, modified or disclosed or disseminated to others except those explicitly listed without the prior written permission of HealthCare Partners Office of Corporate Compliance.

Key Topics

Welcome to HealthCare Partners Code of Conduct Training! By completing this course, you will become knowledgeable about the following key topics as a HCP provider:

| | |
|---|-------------------------------------|
| • HealthCare Partners Mission & Core Values | • Non-Retaliation Policy |
| • Code of Conduct Purpose | • Investigations |
| • Fraud, Waste, and Abuse | • Preventing Misconduct |
| • Corporate Compliance Program | • Disciplinary Action |
| • Confidentiality | • Violations Leading to Termination |
| • HIPAA Privacy | • Code of Conduct Self-Assessment |
| • Reporting Violations | |

Following this training, you must also complete a separate online Provider & FDR Compliance Attestation found on www.HealthCarePartnerNY.com, under the HCP Compliance Program webpage. **You must complete and submit the online attestation to be in compliance.**

HCP's Mission & Core Values

HealthCare Partners, IPA and HealthCare Partners, MSO (HCP) strives to accomplish our mission, realize our vision, and conduct business with our operating principles in mind.

Our **Mission**

- All members receive the support they need to enhance their health and well-being;
- Every provider performs with excellence, guided by the principles of medical evidence and expert clinical experience;
- Members have access to the highest quality care while efficiently using healthcare resources, creating long term value for all stakeholders.

Our **Vision**

“To be recognized by members, providers, and payers as the organization that delivers unsurpassed excellence in healthcare to the people of New York and their communities.”

As a provider, you help us accomplish this goal by performing with excellence, guided by the principles of medical evidence and expert clinical experience.

HCP's Mission & Core Values (Cont'd.)

Our **primary values** are:

| Integrity | Empathy | Quality & Innovation | Collaboration |
|---|--|--|---|
| <p>We adhere to the highest professional, moral, and ethical standards built on a foundation of honesty, confidentiality, trust, respect, and transparency.</p> | <p>We strive to be the best at all we do through our daily commitment to understand and care for our members and each other.</p> | <p>We seek new and creative interventions that provide for more effective, safe and efficient activities across the entire organization.</p> | <p>We are committed to building strong partnerships with likeminded individuals and organizations, working closely with all stakeholders to ensure our members are provided with superior experience of care.</p> |

HCP's Mission & Core Values (Cont'd.)

Relationships with Providers, Contractors, and Vendors

- We strive to employ the highest ethical standards in all business practices and to maintain integrity and an excellent rapport with all business relations.
- Selection criteria will be objectively based upon quality, service, price, technical excellence, and the overall ability to meet our business needs and will not be determined by personal relationships and friendships.



Code of Conduct – Purpose

HCP's Code of Conduct (the "Code") assists in maintaining compliance with legal, ethical, and accreditation standards.

It sets forth the following principles and ethical conduct standards designed to guide and govern the HCP community, **including our providers.**

HCP providers shall...

- ✓ comply with all applicable laws
- ✓ conduct its affairs in accordance with the highest ethical standards
- ✓ avoid conflicts of interest
- ✓ strive to attain the highest standards for all aspects of patient care
- ✓ provide equal opportunity & shall respect the dignity of all members of HCP
- ✓ maintain the appropriate levels of confidentiality for information and documents entrusted to it

Code of Conduct – Purpose (Cont'd.)

The Code is not intended to supersede any other applicable legal or regulatory requirements.

While it is a helpful resource, the Code cannot anticipate or have a rule for every situation that may arise.

When in doubt, the Code provides an ethical framework our providers can apply when there are no clear rules.

Code of Conduct – Purpose (Cont'd.)

In order to meet or exceed our commitment to the community, our members, and business partners, we should, at all times, strive to achieve the utmost ethical, legal, and professional business standards.

HealthCare Partners (HCP) does not grant exceptions to its Code of Conduct, conflicts of interest, and other compliance standards.



Fraud, Waste and Abuse

HCP is obligated to comply with regulatory requirements for preventing, detecting, and correcting Fraud, Waste and Abuse (FWA) as an organization who pays provider claims for services rendered to patients enrolled in a federal healthcare programs.

That includes complying with the Center for Medicare and Medicaid Services (CMS) requirement to establish a Compliance Program that:

- Implements measures to detect, prevent, and correct FWA
- Provides Annual FWA Training to its Workforce, providers and first-tier, downstream and related entity partners (FDRs)*
- Establishes open and effective lines of communication for reporting FWA

**CMS defines FDRs as any party that enters into a written arrangement with a Medicare Advantage organization or Part D plan sponsor to provide administrative services or healthcare-related services.*

Corporate Compliance Program

Similar to our Code, HCP's Corporate Compliance Program (the "Program") supports HCP's commitment to promoting a culture of integrity in its business standards.

It communicates guidelines to our Workforce, providers, and FDR partners to ensure compliance with state and federal laws established to prevent, detect, and correct fraud, waste and abuse and other non-compliant activity.

HCP providers must complete the online attestation indicating they have read and understand our Code and Program found on HCP's public website at www.HealthCarePartnersNY.com under the HCP Compliance Program webpage.

Confidentiality

Confidentiality

All HCP Workforce and providers are expected to maintain confidentiality as it relates to confidential, proprietary or trade secret knowledge, data or internal information of HCP and its affiliates, in whatever form produced for or by HCP.

Such information should not be shared with outside parties. Violations of any of the above could result in legal action.

Examples include, but are not limited to the following:

HCP Strategic Plans
New Product Plans & Ideas
Processes
Formulas

Compensation
Fees
Other Financial Information

Consumer Marketing Research & Information
Customer Lists
Other Research & Development and Marketing Data

HIPAA Privacy

HCP is committed to maintaining the confidentiality of patient's medical records and other personal health information in accordance with the Health Insurance Portability and Accountability Act (HIPAA) privacy and security regulations.

It is important that our providers maintain the same safeguards as HCP to protect the privacy of patients Protected Health Information (PHI), which includes:

- Adopting clear privacy procedures
- Securing patient records containing individually identifiable health information
- Limiting access to patient information to only those who have a business purpose for viewing the information
- Training employees to understand privacy procedures

Reporting Violations

It is our duty to immediately report any potential or suspected violations to Human Resources or the Corporate Compliance and Privacy Officer (CCPO) without fear of retaliation.

You can report a compliance violation or concern by using one of the following methods:

| | |
|--|--|
| Confidential email or call to our CCPO | mphillips@hcpipa.com or (516) 241-2122 |
| Call or online report to the Compliance Hotline * | Toll Free: (888) 475-8376 Online Reporting: hcphotline@ethicspoint.com *You may remain anonymous when submitting a report through the Hotline by phone or via the web. |

Non-Retaliation Policy

All HCP Workforce and providers have a duty to report violations of federal and state laws, accreditation and regulatory requirements, such as health care fraud or HIPAA violations.

You are protected by federal law and HCP's Whistleblower & Non-retaliation Policy.

Under no circumstances will HCP tolerate intimidation or retaliation against any person who makes a report of suspected or actual misconduct to HCP or to law enforcement or a government agency.

Any form of retaliation should be immediately reported to the CCPO directly or through the Compliance Hotline.

Investigations

- Reported allegations of misconduct will be promptly investigated. HCP has established procedures for ensuring the timely investigation and appropriate response to reports of:
 - suspected fraud, waste and abuse;
 - HIPAA privacy and security breaches;
 - cybersecurity incidents; and
 - violations of HCP's Code of Conduct, Corporate Compliance Program, policies, and applicable laws and regulations.
- Efforts will be made to maintain confidentiality of such inquiries and the information gathered.
- Any violations will be referred to the appropriate law enforcement agency(ies), if applicable, and we will assist with any law enforcement investigations.

Preventing Misconduct

In an effort to prevent misconduct, HCP expects all providers to:

- Know and comply with our Code of Conduct and related policies, laws and regulations
- Report any misconduct, violations, or other compliance concerns that you experience or witness directly
- Cooperate with investigations

Disciplinary Action

- Failure to comply with HCP's Code of Conduct or Corporate Compliance Program, or legal or regulatory requirements, may result in disciplinary action, or termination of employment, provider agreement or contract.
- Discipline decisions can vary depending on the severity and the frequency of the misconduct. All decisions will be made in accordance with HCP's Code of Conduct and Disciplinary Action Policy.

You may be subject to termination of your provider agreement if you are aware of a violation or other compliance concern and do not report it.

Violations Leading to Termination

There are violations of the Code of Conduct which could result in immediate termination of your provider contract.

For example:

- Use of alcohol or drugs during work-hours and/or on the company premise
- Violence in the workplace
- Harassment and discrimination
- Bribery, kickbacks, gifts and gratuities
- Weapons at the workplace
- Other egregious acts of misconduct

Violations Leading to Termination (Cont'd.)

Substance Abuse

- We are committed to providing a drug and alcohol-free work environment to protect the interest of all individuals involved. HCP providers and their staff are expected to uphold this commitment in their interactions with our members.
- The use of alcohol, illegal drugs, or controlled substances, whether on or off the job, can adversely affect an employee's work performance, efficiency, and health.

Controlled Substances

- Only licensed personnel, within the scope of their practice, are authorized to handle controlled substances in accordance with our policies and procedures and state and federal regulations.

Violations Leading to Termination (Cont'd.)

Workplace Violence

- It is our intent to provide a safe workplace for employees and to provide a comfortable and secure atmosphere for customers and others with whom we do business.
- We have zero tolerance for violent acts or threats of violence.

Harassment and Discrimination

- We are committed to providing and maintaining a work environment free of all forms of discrimination and harassment.
- HCP will not tolerate any form of harassment at any level of the organization among our Workforce and HCP providers.
- We will promptly investigate and appropriately address any allegations of discrimination or harassment.

Violations Leading to Termination (Cont'd.)

Bribery, Kickbacks, Gifts and Gratuities

- Providers are prohibited from accepting or asking for bribes, kickbacks, gratuities or other forms of payment.
- Providers may not accept or solicit any gift, gratuity or favor with the purpose of inducing patient referrals.
- Providers may not refer members for designated health services payable to Medicare or Medicaid with which the provider or his/her immediate family has a financial interest.
- Providers or other business affiliates may not offer anything of value to a government official or other third party in an effort to influence business or to gain special treatment as an individual or organization.

Code of Conduct Self-Assessment

The following assessment is meant to guide you in your professional role and provide a framework for your daily activities. As a HCP provider, you should maintain these principles in your relationships with your patients, colleagues and staff.



HCP Provider Standards of Conduct

- ✓ I demonstrate HCP's vision, mission and values in my actions.
- ✓ I place patient benefit over my personal gain.
- ✓ I use my position solely to fulfill my responsibilities and not for self-interest or to further the interests of family, friends or associates.

Code of Conduct Self-Assessment (Cont'd.)



HCP Provider Standards of Conduct (Cont'd.)

- ✓ I promote a patient's right to privacy, including medical record confidentiality, and do not tolerate breaches of this confidentiality.
- ✓ I expect and hold staff accountable for adherence to our organization's ethical standards
- ✓ I hold all staff and clinical/business partners accountable for compliance with professional standards, including ethical behavior.



HealthCare Partners, IPA
HealthCare Partners, MSO