



Code of Conduct

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Purpose of the Code of Conduct

Inspire has adopted this Code of Conduct to provide standards by which all members of the organization will conduct themselves. Individual conduct must be in a manner that protects and promotes organization-wide integrity and enhances Inspire's ability to achieve its organizational mission. These requirements apply to our relationships with the persons we serve, board members, medical and provider staff, vendors, contracted employees, consultants, students, volunteers and each other. The Code of Conduct is a critical component of our Compliance and Ethics Program.

The code is intended to be used as a guide to help employees make sound decisions, promote integrity and compliance and practice sound ethical and professional judgment in day to day activities. While the Code may give guidance in some instances, the employee is expected to seek additional information or assistance from supervisors, the Compliance Officer, and Inspire policies and procedures.

Compliance with this Code of Conduct is a condition of employment. Failure to follow or abusing the code is grounds for disciplinary action up to and including dismissal.

Mission Statement

Inspire's mission is to form partnerships with adults and children who have challenges in order to maximize their capabilities to lead fuller lives:

- by providing meaningful person-centered services
- by educating about disability, intervention and resources
- by promoting inclusion within the community
- by responding to changing community needs

Operational Values

- **Integrity – in the way we act, work, communicate and learn from mistakes**

- **Respect – in the way we treat others, communicate, and deal directly with each other**
- **Customer Focus – in the way we treat persons in care and each other, create and follow processes, and gather and learn from feedback.**

Our Actions are governed by these Expectations:

- We respect the dignity of each person.
- We are honest, fair and trustworthy.
- We support Inspire's integrity and reputation.
- We cooperate with peers and supervisors.
- We perform our jobs in an ethical manner.
- We understand we are responsible to maintain proper credentials and expertise for our positions.
- We bill accurately and timely for services rendered.
- We document services contemporaneously and truthfully, perform services that are medically or developmentally necessary and submit bills with proper documentation.
- We communicate problems, errors and deficiencies to the attention of our supervisors and the Compliance Officer who can properly assess and resolve the problem.
- We comply with the rules and regulations of the agency, the County, the State and the Federal Government.

Commitment to Legal and Ethical Conduct:

Inspire is committed to full compliance with the laws that apply to our agency, including federal, state and county laws, and the regulations and requirements of federal health care programs including Medicare and Medicaid. Inspire has published this Code of Conduct to represent our commitment to high standards of performance and behavior.

Compliance with Laws and Regulations

- Inspire operates in accordance with high legal, moral, and ethical standards and with all applicable laws, regulations, and standards of the Federal, State and County.
- We require that all statements, communications, and representations be accurate, complete, and truthful.
- We will not tolerate false statements by employees to a government agency or other payer. Deliberate misstatements to government agencies or other payers will be grounds for disciplinary action which may include dismissal. (See False Claims Policy).
- Every payment for services must be supported by proper documentation that the services were provided.
- We will not pay employees for referral of persons we serve, or accept payments for referrals we make.
- We will ensure that all reports or other information required by federal, state, or local government agency or program are filed timely, accurately, and in conformance with the applicable laws and regulations.

Corporate Compliance

Inspire believes in having a strong, effective compliance and ethics program to combat fraud and maintain the health and well-being of the agency. (See Compliance Plan and Policies)

- Employees are expected to follow the Compliance Plan which can be located on the Inspire intranet.
- Employees are required to complete Compliance training annually
- New employees, including temporary hires, are required to complete Compliance training during the first week of hire.
- Employees are expected to read and follow the Code of Conduct, compliance policies, and departmental policies that apply to their jobs.

- Employees are required to report suspected or actual non-compliance, or failure to follow policies to their supervisor or to the Compliance Officer.
- Any employee who reports a concern in good faith is protected from retaliation by Inspire's Non-Retaliation, Non-Intimidation policy, as well as by federal and state laws. (See Non-Retaliation, on-Intimidation Policy)
- Non-compliance with published policies will result in disciplinary actions up to and including dismissal.
- All employees will be treated equally and fairly when non-compliance is identified. Discipline will depend on infraction and employee's frequency of violation, and will be applied equally across all levels of employees.

Conditions of Hire

- Inspire will not employ or contract sanctioned individuals or companies. Employees, contractors, physicians and vendors are checked through the sanctioned federal and state databases at the start of their relationships with Inspire, and are rechecked on a monthly basis. Appearance on any exclusion list will be cause for immediate termination.
- Employees holding professional licenses and certifications are subject to periodic license and certification verifications.
- Expiration of license, certifications or misconduct against one's license may result in disciplinary action, up to and including dismissal. (See Hiring and Credentialing Policies)
- We offer equal employment opportunity for all with no discrimination in hiring, transfer, or promotions because of age, gender, sexual orientation, disability, race, creed, or national origin.

Certificate and License Renewals

Employees whose profession requires licensure or certification are responsible for maintaining their professional standing and promptly providing renewals to the Human Resource Department. Professional employees must comply with state and federal laws that apply to their discipline. This applies to teachers and teacher assistants, nurses, physical and occupational therapists and assistants, speech-language pathologists, psychologists and school psychologists, physicians, school administrators and social workers. Failure to provide HR with renewals or new licenses may result in disciplinary actions that may affect your employment.

Coding and Billing Integrity

- We require accurate bills that reflect only services actually rendered, use billing codes that accurately describe the service provided and maintain documented medical necessity.
- We will take every reasonable precaution to ensure that our billing and coding work is accurate, timely, and in compliance with our policies and with federal and state laws and regulations.
- We will not tolerate the submission of any claims that contain any kind of false, fraudulent, or inaccurate statements.
- We will promptly report a transaction that is not in compliance with agency policy and federal, state and county laws and regulations. (See Self-Disclosure Policy)

- We have adopted policies and procedures to prevent and detect fraud, waste and abuse, and which are in compliance with both federal and state law.
- We will submit claims only for actual services provided to the persons we serve.
- We will establish lawful and positive relationships with payer sources by negotiating treatment benefits in good faith, maintaining ongoing communication about the progress and billing of the persons we serve within the parameters negotiated.
- Care plans for persons we serve will be based solely on sound clinical decisions and not how the health care facility is compensated for care provided.

Communication with the Media

Staff members may not communicate with the media or participate in any interviews, picture taking or other types of media contact without first contacting the Community Relations Department. All communication with any media source must be approved by the Community Relations Department. Community Relations will ensure that the media releases meet regulatory and privacy guidelines.

Confidentiality

We are committed to protecting the privacy and confidentiality of the persons we serve. Employees may not discuss with anyone outside the agency any issue, act, policy or procedure that involves Inspire, as an agency, the persons we serve or other Inspire employees. Policies may be shared with other agencies only if approved by Executive Management. Specific details are outlined in our Confidentiality Policy. Employees sign an attestation annually and new employees sign upon hire and annually thereafter. This attestation is filed in employees' personnel files. (See Confidentiality Policy)

Conflict of Interest

We are committed, as an agency, to avoid any conflict of interest or the appearance of a conflict among staff, management and the Board of Directors, by disclosing pertinent facts, and by exercising the best care and judgment for the agency and not for personal benefit.

- Employees must disclose outside employment which might be perceived as a conflict of interest including other employment within their professions.
- Employees may not treat Inspire clients outside of Inspire.
- Employees must disclose any individual or family relationship that may be perceived as a Conflict of Interest.
- Employees must also disclose a relationship with other employees within the organization. (See Nepotism Policy)

Inspire's Conflict of Interest policy is distributed to new employees upon hire. All employees are expected to read the Conflict of Interest policy, fill in requested information and sign the attestation which will be maintained in the employee's file. Employees are expected to sign the attestation annually, or sooner, if a change occurs that necessitates an update. (See Conflict of Interest Policy)

Education and Training

All new employees will complete training as issued by Human Resources for their position within the first week of employment. The training will include Compliance and Ethics, Privacy and Security, Harassment/Abuse, Domestic Violence/Abuse, Emergency Response, Infection Control and HIV, Safety, Hazard Material Communication and Incident Reporting. All other

employees will complete annual in-service training within 2 months of their anniversary date of hire. Additional training to address areas of concern within a department or service will occur as needed.

We honor professional growth and development and encourage employees to engage in education and trainings that are relevant to their work.

Harassment and Workplace Violence

- Inspire does not tolerate, acts of hostility, sexual or other harassment, intimidation, or violence toward any person in care, employee, contractor or vendor.
- We will maintain a working environment free from all forms of harassment / disruptive behavior. Any and all forms of harassment, including those based on age, gender, sexual orientation, disability, race, creed, or national origin, by co-workers, supervisors, physicians, contractors, vendors, or volunteers will not be tolerated.
- Harassment may consist of offensive comments, jokes, innuendoes, or other verbal, graphic, or physical conduct relating to an individual's age, gender, sexual orientation, disability, race, creed, or national origin.
- Any employee who feels that he/she has been the victim of harassment or workplace violence or has witnessed harassment or violence is required to report the incident as per Inspire policy to the Human Resource Department at 845-614-5975 ext.110.

Hiring of Contractors

- In accordance with policy, any service or product that exceeds \$5,000 is subject to three competitive bids unless the exception process has been followed, documented and approved. All documentation is sent to the Finance Department with the contract.
- We will ensure that all contracts are in compliance with applicable laws, regulations, bidding standards and accreditation standards by strictly following established Inspire contract review and authorization processes.
- Contracts will include directions to access Inspire's Code of Conduct and False Claims Act on our website.

Marketing, Advertising and Media

We will engage in open and fair marketing practices, based on the needs of our community and consistent with regulations and our mission and policy. According to the regulatory guidelines, Inspire may participate in marketing, advertising and media outreach to educate and provide information to the public about Inspire and its services, as well as additional services in the area. Inspire will strive to present truthful, informative material and announcements. We will abide by the privacy laws specified in all HIPAA Privacy Laws as they are revised.

Measuring Effectiveness

Inspire uses many methods of measuring the effectiveness of the Compliance Program such as auditing, monitoring, reviewing external audits, surveys and citations, ongoing evaluation of billing, reviewing insurance denials, monitoring hotline (and other) reports, investigations and performance evaluations. Organizational compliance effectiveness is everyone's responsibility and the basis for the Code of Conduct. Employees are expected to cooperate in reviews, investigations or audits whether conducted by Inspire or external personnel.

Positive Work Environment

- We will maintain the high professional standards expected by Inspire.
- We will conform to the standards of our professions and exercise judgment and objectivity in the performance of our duties.
- We will show courtesy and consideration to fellow employees and personnel of Inspire, without regard to position or status.
- We will be punctual in reporting for work, and provide services on time as best we can.
- We will provide training for all employees upon hire and annually. We also provide focused training for an employee's position and when changes and revisions of laws require new policies.
- We recognize the value of a diverse workforce and will remain open to new viewpoints, ideas, and talents.
- We promote an environment where reporting concerns is mandatory for all employees without fear of retaliation or intimidation.
- We will not tolerate false reports or reports made in bad faith about an Inspire employee.
- We will not engage in retaliation or reprisal against anyone who properly reports violations of law, regulations, or Inspire policies. Any employee who feels that he/she has been retaliated or intimidated against after reporting a concern should immediately notify Human Resources or the Compliance Office.

Professional Boundaries-Inspire employees must recognize their relationship to the person in care is professional not personal. Employees are expected to maintain a professional work environment and not participate in family activities. Employees who work with preschool students or with Early Intervention must take the Orange County EI/Preschool Professional Boundaries course. Providers must sign an Orange County Ethics page for each child seen for Early Intervention and Preschool services.

Privacy and Security

Inspire's Privacy and Security Program ensures the privacy and confidentiality of information collected for persons we serve as well as all employees, the integrity of the building and the records, and the safety of the employees and people we serve. The policies extend to all information regardless of location or storage mediums and Inspire's Internet Policies.

- We will not inappropriately share details about our building or computer security systems or our policies and procedures that are designed to prevent unauthorized access or criminal conduct at our facilities.
- We will respect our personal user identification and password and take reasonable steps to protect them from unauthorized use.
- When sharing confidential information for purposes other than treatment, we will adhere strictly to the authorization and minimum necessary standards and only disclose authorized information necessary to accomplish the task.
- We will use reasonable precautions to protect patient, client and student's information at all times.
- We will use reasonable steps to ensure unauthorized persons do not overhear or see confidential information. We will not place any confidential information in public areas where the information can be easily seen by unauthorized persons.

- We will not discuss any confidential information pertaining to our coworkers or persons we serve that we obtain in our official capacity unless doing so is ethical and necessary to complete our duties.
- We will not prop doors open and will make sure locked doors remain locked.
- We will promptly report any theft or loss of confidential information to the Privacy Officer and supervisor.
- We will not allow vendors or contractors to access any Inspire computer unless approved by Information Technology Services.
- We will not load any unauthorized computer programs onto any Inspire computer.
- We will not disable or try to defeat any security device or procedure utilized by Inspire.
- We will not connect any unauthorized device to an Inspire computer or network.
- We will only use approved methods for storing confidential information electronically.
- We will follow Inspire's policy to properly dispose of media such as floppy disks, media cards, thumb drives, media cards, DVDs, or CDs that contain confidential information.
- We will properly dispose of confidential paper information by placing it in approved containers for shredding.
- We will store confidential information in a way that prevents unauthorized access.
- When it is necessary to store confidential information, we will follow Inspire's record retention policies and we will ensure the information is properly destroyed consistent with Inspire policies when the retention period has expired.
- We will strictly adhere to company policy regarding the faxing of confidential information, including the verification of fax numbers, the use of approved fax cover sheets and the confirmation fax receipt.

Property and Interests

- We will safeguard all property that is placed in our care.
- We will properly use all assets, property, equipment, supplies, and time that belong to Inspire.
- We will not engage in financial misconduct, including the outright theft of property, embezzlement of money, or the use of money belonging to Inspire or persons we serve in any unauthorized purpose.
- We will dispose of surplus, obsolete, and junked property or anything of value according to the established policies and procedures.
- We will conserve resources and utilities such as natural gas, water, electricity and telephone service. We will dispose of all hazardous or environmentally unfriendly material in the proper manner. We will participate in the recycling efforts in all buildings.
- We will not use Inspire resources for any unauthorized personal reasons.
- We will protect our Inspire identification badge to prevent theft or unauthorized use or access.

Quality of Care

Inspire is committed to providing the highest quality of service by meeting the needs of the persons we serve with the utmost care and courtesy. We will perform our duties in a responsible, reliable, professional, and cost effective manner.

- We respect the dignity, comfort, and convenience of the persons we serve and will treat each with consideration, courtesy, and respect.

- We will provide equal access to high quality care to the persons we serve without discrimination or exclusion based on race, color, national origin, age, disability, or sex.
- We will make care decisions based on physicians'/dentists' recommendations, clinical and developmental needs, and medical, educational and habilitation necessity.
- We will only use personnel with the proper license, certification, credentials, and expertise in meeting the needs of the persons we serve.
- We will not distribute unauthorized materials and information, nor solicit the persons we serve, employees, or visitors for any purpose that is not approved or sanctioned by Inspire.
- We will ensure that all service record documentation is legible, accurate, complete, and timely. Authorized corrections will be done strictly according to policy.

Safe Healthcare Environment

Inspire is committed to an environment where the health, safety, privacy, and comfort of persons we serve and employees come first.

- We shall comply with all laws and regulations concerning the handling and disposal of hazardous waste, as well as other applicable environmental laws and regulations.
- We will provide medical, educational and habilitative services and products to persons we serve that are appropriate and considered safe for intended use and are in compliance with all applicable laws, regulations, professional standards, and Inspire's policies and procedures.
- Employees will be trained in safety procedures, infection control and hazard material identification. Employees must follow regulations, and comply with guidelines, procedures and rules of the Safety Committee to protect the well-being of persons we serve, employees, and our business.
- We prohibit smoking in Inspire buildings, on Inspire property and in Inspire vehicles.
- All staff members are required to wear their Inspire ID badges at all times when engaged in work activities. Badges must be worn so the picture and name are clearly visible.
- Visitors and vendors are required to sign in and wear a temporary badge.
- Staff members are expected to question any untagged individual, and return unaccompanied visitors to reception.
- Staff must report immediately any suspicious person or act. Any staff member may call 911 if the situation warrants immediate response.
- Employees are expected to immediately report any unsafe working conditions to their supervisors, the safety committee or to facilities.
- We will follow instructions during fire and emergency response drills.
- We will report the loss of building keys or key fobs immediately.
- We expect all staff to have valid driver's licenses and carry personal insurance if driving for Inspire purposes.
- We will obey all traffic laws and regulations while operating automobiles that belong to Inspire, or while transporting people in care in any vehicle.

Social Media

Inspire has a detailed social media policy that employees are expected to follow. Pictures or information regarding people in our care is protected information and disclosing information may violate HIPAA and FERPA. (See Social Media Policy).

Staff Health Information

Employees may not access their own medical records or medical records of their family members or friends outside normal records access processes.

Stark and Anti-kickback Laws

We will not engage in any corrupt business practice, including bribery, kick-backs or payoffs, intended to induce, influence, or reward favorable decisions of any person we serve, contractor, vendor, government personnel, or anyone in a position to benefit us in any way. Employees may not accept gifts from patients or families valued at more than \$25. Employees may not accept gifts of any amount intended to influence their decision making.

Obligation to Report

Inspire's reputation is important to us. Failure to report a concern in a timely way may subject Inspire to regulatory fines, return of payments and harm to our reputation. (See "Reporting" and "Investigation and Response" policies).

- If you believe you have information about health care providers, practitioners, entities, or other persons engaging in improper activities or arrangements, it is your responsibility to report these concerns. Employees reporting information in good faith are protected from retaliation or intimidation. This provision does not absolve or clear any personal confessions of wrongdoing.
- Employees may report
 - Directly to the Corporate Compliance Officer.
 - By calling the Compliance Hotline at 845-294-8806 x301. This is available should you wish to remain anonymous or to report after work hours.
 - By emailing Compliance at reportcompliance@inspirecp.org
 - By completing and forwarding a Compliance Issues Report to the Compliance Officer. Forms are located on the Inspire Intranet.
- You may report concerns to
 - Your Supervisor or Manager
 - Human Resources
 - Security Officer

These individuals are obligated to act on reports you make, including notifying the Compliance Officer or Executive Administration.

Concerns brought to the attention of the Compliance Officer will be promptly and thoroughly evaluated and investigated for timely resolution.

Thank you for reading this Code of Conduct. Your participation in Inspire is crucial to our success.