



STANDARDS OF CONDUCT

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Lifesong Hospice and Palliative Care expects all staff, volunteers, and Board members to:

- Commit to excellence through continuously improving the quality of our work, and to be responsive to our patients and their caregivers, our co-workers and to our community;
- Be team members who think of patients first and have a broad vision beyond individually assigned areas of responsibility;
- Be good listeners and respect each other's point of view;
- Work towards the accomplishment of Lifesong Hospice and Palliative Care's Mission, Vision, and Values;
- Be advocates and representatives of Lifesong Hospice and Palliative Care to the community;
- Honor the dignity and worth of everyone we work with;
- Address persons directly about issues of style or decisions that may not be consistent with organizational culture or with the Mission, Vision, or Values of Lifesong Hospice and Palliative Care; and
- Commit to providing quality hospice care with empathy and understanding.

Our Mission: To inspire our caregivers to create harmony for each unique life story.

Our Vision: To honor legacies with grace.

Our Foundation Principles:

Family Values: Treat every patient and family as if our own and with consideration, concern and empathy.

Respect: Dignify this stage of our patient's life and our individual roles in delivering compassion and care.

Sense of Duty: Advocate for our patient's comfort and co-worker's passion to care.

Empathy: Regard our patient's circumstances with sensitivity and support in every interaction.

Patience: Listen to each patient, family member and co-worker with our fullest attention and abilities.

Purpose of Lifesong Hospice and Palliative Care's Standards of Conduct

Hospice care is highly regulated and the laws and regulations that govern hospice practice are numerous and complex. The reputation of Lifesong Hospice and Palliative Care in clinical practice and compliance with legal and ethical requirements is critical to maintaining the confidence of our patients and their caregivers, and the public. To this end, Lifesong Hospice and Palliative Care is committed to:

- Ensuring our co-workers, governing body, volunteers, suppliers, contracted services, and any other contracted agents understand and take responsibility for compliance with all applicable laws, rules, and regulations;
- Avoiding conflicts of interest and conducting business with the highest degree of integrity and honesty; and
- Treating all our customers with dignity and respect.

Board of Directors

The Board of Directors is ultimately responsible for ensuring Lifesong Hospice and Palliative Care has an active and effective Compliance Program. The Board demonstrates support for the Compliance Program through commitment of financial resources to support the program, review compliance activities, and annual evaluation of the Compliance Program's effectiveness.

Leadership

While all co-workers of Lifesong Hospice and Palliative Care are responsible for adhering to the Standards of Conduct, leadership within the organization is expected to act as models of adherence of the Standards. Leadership is responsible for ensuring a culture that promotes high standards of ethics and compliance, and with selecting future co-workers who embody these characteristics.

Leadership is responsible for:

- Assessing areas of responsibility to determine areas of high risk;
- Maintaining current working knowledge of laws that affect his/her area(s) of responsibility;
- Implementing effective internal controls to provide reasonable assurance that processes comply with all applicable laws, rules, and regulations;
- Ensuring that potential and real violations are reported to the appropriate person and that changes are implemented to prevent further/future violations;
- Reporting compliance activities to the Compliance Officer;
- Supporting and ensuring co-worker participation in both annual and special topic compliance training related to their roles;
- Creating an ethical culture that allows co-workers to raise appropriate questions of potential violations of standards without fear of retaliation;
- Annually completing the Conflict of Interest Disclosure Form; and
- Assuring co-workers leaving the organization have turned in all keys, identification badges, computers, phones, or any other items that may compromise Lifesong Hospice and Palliative Care's or facility security.

Co-workers and Volunteers

Co-workers and volunteers are responsible for:

- Adhering to the requirements outlined in all applicable Human Resources policies and the Standards of Conduct;
- Knowing and following established policies, procedures, and laws related to compliance and their department;
- Participating in compliance training;
- Reporting suspected violations promptly to their supervisor, the Compliance Officer, or compliance hotline.

Highest Quality Hospice Care for Patients and Caregivers

Lifesong Hospice and Palliative Care is committed to providing excellent hospice care, treatment, and services to all patients and their caregivers and expects all staff to treat patients and caregivers with care, respect, and dignity. This commitment to excellence includes physical, emotional, and spiritual care for each person.

We are committed as a team to achieve quality care and patient safety. Lifesong Hospice and Palliative Care expects co-worker involvement in departmental and organizational initiatives for continuous improvement in quality of care and safety for our patients. When a Lifesong Hospice and Palliative Care co-worker or volunteer has questions related to quality of care or patient safety, s/he is obligated to raise the concern through appropriate channels.

Patients will not be denied care, treatment, or services based on race, religion, color, culture, language, national origin, ethnic background, sex, sexual orientation, gender identity or expression, age, disability, marital status or source of payment. Upon admission, each patient will receive detailed document outlining Patient Rights and Responsibilities. Lifesong Hospice and Palliative Care staff understand patients have the right to make informed decisions about their care, treatment, and services based on information provided by appropriate individuals and presented in a manner that is easily understandable by patients and their caregivers. Also, patients are entitled to refuse treatment and to be informed of the consequences of that refusal.

Patients are entitled to receive information about designating another person to make decisions about their medical care (Advance Directives) in the event they are not capable of making decisions on their own. Patients may formulate advance directives, and the staff will comply with the provisions of the directives within the guidelines of the law and medical ethics.

Lifesong Hospice and Palliative Care and its workforce are also committed to assuring the most patient-friendly services are provided. Staff and volunteers are expected to create a proper atmosphere for patients, their caregivers, and visitors through:

- Attention to both facility and personal appearance;
- Individual professionalism – being responsible for your actions and taking pride in your work;
- Effective communication – using plain language, making eye contact, using proper phone etiquette, smiling and greeting patients, caregivers, and visitors; and
- Exceeding patient, family, and co-worker expectations.

Patients will receive information upon admission on how to raise any concerns about their care directly to the organization or to a regulating body. In the event a patient or family member expresses concern about the care received by Lifesong Hospice and Palliative Care, co-workers and/or volunteers are individually responsible to address the issue or refer it to the appropriate individual within the organization.

Our Community

Lifesong Hospice and Palliative Care is committed to providing education on hospice care, treatment, and services throughout the community it serves. Other educational opportunities, including information on Advance Directives, are provided as well.

Acting as representatives of Lifesong Hospice and Palliative Care, co-workers will not participate or intervene in any political campaign on behalf of or in opposition to any candidate for public office. Examples of participation include publishing statements, or contributing money, property, or the services of any co-worker at the expense of Lifesong Hospice and Palliative Care. Any attempt to influence the decision-making process of a government representative by an improper offer of any benefit is absolutely prohibited, and any request by a government representative for any improper benefit should be reported. When Lifesong Hospice and Palliative Care can contribute to a level of understanding of hospice issues, Lifesong Hospice and Palliative Care may assist in governmental issues. The organization may publically offer recommendations or positions concerning legislation or regulations being considered that impact operation of Lifesong Hospice and Palliative Care. Co-workers may personally participate in political processes using their own time and financial resources, but may never represent their personal point of view as that of Lifesong Hospice and Palliative Care.

Environmental Health and Safety

It is essential everyone knows and understands the safety laws, regulations, and policies pertaining to their roles within Lifesong Hospice and Palliative Care. To ensure current knowledge on safety issues and regulations, co-workers and volunteers are required to complete yearly education. Some departments may have additional requirements based on job duties. It is each co-worker's/volunteer's responsibility to attend and adhere to information contained in this education.

Although this list is not exhaustive of all potential situations and responsibilities, co-workers and volunteers are required to:

- Follow all co-worker health guidelines.
- Adhere to standard precautions, sterile environments, and environmental controls to reduce the risk of disease transmission.
- Properly report infections.
- Maintain refrigeration at required temperatures.
- Wear safety equipment when using machines or personal protective equipment as required.
- Follow manufacturers' equipment handling guidelines.
- Adhere to proper handling of hazardous waste and alert leadership of improper handling or disposal of waste.
- Know your respective departmental role for emergency preparedness to protect our patients.

Lifesong Hospice and Palliative Care is committed to the safety and security of all co-workers, volunteers, and visitors. Maintaining a safe and secure environment requires cooperation and communication between workforce members and management/leadership. Intimidating and disruptive behaviors, whether overt or passive, may jeopardize patient care and other work and will not be tolerated. Examples of unacceptable behavior include but are not limited to:

- Verbal outbursts and physical threats;
- Refusing to perform assigned tasks, answer questions, or return phone calls; and
- Condescending language or voice intonation.

Workforce members will:

- Wear appropriately displayed name badges at all times and be familiar with others that work in their areas;
- Report suspicious persons or situations immediately; and

- Remain calm, listen, and diffuse verbally hostile situations.

Only authorized individuals will have access to controlled substances, prescription drugs, and other medical supplies. These substances are provided under the order of a physician or nurse practitioner and must always be administered by the appropriate individual in accordance with organizational policy and laws, rules, and regulation. Should you become aware of inappropriate use or other violation related to drugs or supplies, you are to report the occurrence immediately.

Proper Employment Practices

Lifesong Hospice and Palliative Care takes reasonable precautions to ensure the work environment is free of discrimination or harassment in compliance with federal and state laws. All co-workers and volunteers are to be treated fairly, without regard to race, age, color, sex, religion, national origin, height, weight, marital status, or disability. This applies to all employment decisions, including but not limited to hiring, promotion, transfer, discipline, layoff, termination, compensation, and terms and conditions of employment.

Each person has the right to work in an environment free from discriminatory practices and unlawful harassment. Any co-worker/volunteer who believes s/he has been subject to discrimination or harassment, or any co-worker who witnesses such conduct, should immediately report it to management or Human Resources.

To ensure the highest level of patient care and to provide for the safety and welfare of patients, visitors, and co-workers, the Lifesong Hospice and Palliative Care workplace must be free of health and safety hazards caused by use or abuse of alcohol or drugs. Any co-worker who observes a colleague who appears to be impaired in the performance of his or her job is required to immediately consult with management or Human Resources.

Lifesong Hospice and Palliative Care will not knowingly hire or employ any individual who is excluded from participating in Federal health care programs. Therefore, Lifesong Hospice and Palliative Care will conduct background checks of prospective co-workers and physicians. Co-workers are responsible to maintain credentials, licenses, and certifications necessary to perform their job functions.

Ethical Business Practices

To maintain public trust, co-workers are expected to act in the best interest of Lifesong Hospice and Palliative Care, and to conduct all activities on behalf of the hospice in good faith, careful to avoid the appearance of a conflict of interest. **A conflict of interest can exist in any instance where an individual's actions or activities on behalf of the organization result in personal gain. Specifically:**

- Co-workers may not solicit or accept anything of more than de minimis value, including a loan, reward, material or property from a patient or a patient's family, visitor, contractor, supplier, or competitor. Accepting cash or a cash equivalent, like a gift certificate is strictly forbidden. However, it is recognized that situations may arise where refusal of a small token of appreciation from a patient or family member, such as cookies or candy, may be awkward and embarrassing. In these situations, co-workers may accept such small items. Co-workers should direct patients or family members who want to make a donation to contact the Business Office Manager or Clinical Director.
- Co-workers who sit on boards of directors or advisory boards of outside organizations must disclose this information. In additions, they may not be involved in decisions that impact the outside organization and Lifesong Hospice and Palliative Care. The use of official position and influence to further personal gain or that of family members or associates is considered unacceptable behavior.
- Co-workers may not use their employment or any information received through Lifesong Hospice and Palliative Care to obtain financial gain (direct or indirect) for themselves, a member of their family or a business with which they or a member of their family is associated.
- Outside employment or business activities must be limited to off-work time. During work hours, co-workers are expected to devote their best and full time efforts to their Lifesong Hospice and Palliative Care job responsibilities.

- Co-workers will report any situation that may be considered a conflict of interest that arises during their employment with Lifesong Hospice and Palliative Care to Human Resource management. Human Resource management staff will consult with the appropriate compliance person and then will respond to the co-worker who discloses the potential conflict.
- Failure to abide by the above provisions may result in disciplinary action, up to and including termination of employment.

Managing conflicts of interest is essential to ensuring integrity in business decisions and maintaining public trust. Members of the Board of Trustees, leadership, contracted providers and other designated individuals are required to complete a Conflict of Interest Disclosure on an annual basis.

Accurate, Honest Financial Transactions

Co-workers must report and record all information honestly, completely, and accurately. Resources, including equipment, supplies, and paid work time belong to Lifesong Hospice and Palliative Care and should be protected from theft and waste.

Lifesong Hospice and Palliative care co-workers, physicians, volunteers, and contractors must remain committed to protecting assets, including but not limited to:

- Appropriately representing productivity
- Accurately recording travel expenses and mileage
- Securing money, equipment, or supplies from theft
- Complying with business expense reimbursement policies
- Purchasing good and services for organizational use only

Lifesong Hospice and Palliative Care expects honest, accurate, and complete reporting of financial transactions, including information provided to third party payers, cost reports, IRS forms, and financial statements. Internal and external controls are maintained to provide assurance that transactions are complete in accordance with management’s authorization and in accordance with all applicable laws, rules, and guidelines. Cost and statistical reports are subject to internal and external review.

Accurate Coding and Billing Transactions

Co-workers and providers must make certain that codes submitted for billing transactions accurately reflect the patient’s diagnoses. Co-workers and physicians will follow applicable laws, policies, and procedures to ensure accurate coding, billing, and collection activities to governmental payers, commercial insurances, and patients or their legal representative. When billing questions arise, co-workers will resolve matters in a professional and courteous manner. **Co-workers, physicians, and contracted providers must remain committed to accurate business practices, including:**

- Billing for services at levels that are supported by medical record documentation
- Waiving of co-pays or deductibles only in accordance with policy and procedure
- Attempting to collect outstanding balances from a Medicare or Medicaid patient only when Advance Beneficiary Notices were provided prior to service
- Preventing duplicate billing

Any subcontractors engaged to perform coding and billing functions are expected to have the necessary competencies, processes and systems to ensure accurate billing. They are required to have their own compliance programs and codes of conduct, or to adopt those of Lifesong Hospice and Palliative Care.

Confidentiality and Electronic Security

Patient Information

The Health Insurance Portability and Accountability Act (HIPAA) established requirements for the handling, processing, and storage of patients’ health information. The regulations, governed by the Office of Civil Rights, do not replace existing

policies but further support and strengthen the commitment to keep patient information secure. The Privacy and Security Rules affect every health care worker, volunteer, physician, and contracted staff.

Patients provide Lifesong Hospice and Palliative Care staff with sensitive protected health information (PHI) so the best possible hospice care can be provided. PHI refers to any information, whether oral or recorded in any form, that is created or received by a health care provider and relates to a past, present or future medical condition or payment for services of and individual. The Privacy Rules give guidance on how, when, and with whom PHI can be shared. The Security Rules provide guidance on administrative, physical, and technical safeguards for protecting PHI when storing or communicating electronically. **It is the responsibility of every co-worker, physician, volunteer, and contractor or vendor to adhere to regulations, policies and procedures, and patient rights for privacy, including the right to:**

- Confidential communication of PHI
- Receive a notice of uses and disclosures of PHI
- Access or receive a copy of their medical record
- Request a restriction on how PHI is used
- Request changes (amendments) to their records
- Receive a listing (accounting of disclosures) if requested of PHI disclosures during the previous six year period

Lifesong Hospice and Palliative Care co-workers may use or disclose PHI for treatment, payment, and healthcare operations or as required by law, but co-workers must abide by the “need to know” and “minimum necessary” standards outlined in the Privacy Rule. Release of PHI for other reasons requires the patient’s authorization or a court order.

Co-workers and volunteers receive training on privacy and security policies at their time of hire and ongoing. Suspected or actual violations must be reported to the Lifesong Privacy Officer, Lifesong Compliance Officer, Lifesong Security Officer, Corporate Compliance Officer or to the Compliance Hot Line. All reports will be investigated.

Business Information

Workforce members may be exposed to many types of confidential business information, including information related to strategies, financial information, or other sensitive information. Many of the same safeguards used to protect confidential patient information should be used to protect Lifesong Hospice and Palliative Care’s business and financial information.

All work products of co-workers, including but not limited to ideas, refinements, and all records and files concerning operations belong to and remain property of Lifesong Hospice and Palliative Care. Work product, records, or files should not be removed from the premises except in the ordinary course of performance of service. All work products, records, and files shall remain with Lifesong Hospice and Palliative Care upon the co-worker’s termination of employment.

Retention and Destruction of Documents and Electronic Media

Laws and regulations specify how long many business and clinical records must be retained, and in some cases, how they must be destroyed. Each department is responsible for ensuring that records are retained and destroyed in accordance with Lifesong Hospice and Palliative Care’s policy. Paper and electronic media (e.g., disks, CDs, USB flash drives, etc.) containing PHI or other confidential business information should be placed into a locked shredding bin or sent to the authorized contractor for destruction.

Adherence to All Laws, Rules, and Regulations

The laws surrounding health care are numerous and complex. Lifesong Hospice and Palliative Care expects all workforce members to be familiar with laws applicable to their specific roles.

Ongoing Monitoring

Lifesong Hospice and Palliative Care is committed to ensuring the effectiveness of its Compliance Program and Standards of Conduct. Ongoing monitoring and program evaluation occurs through internal audits. Audits are used to evaluate internal controls and adherence to applicable laws and regulations. These audits are completed as part of plan or risk assessments, ongoing financial business processes, or by an identified need. Audit or review follow-ups are integral to good management and an effective compliance program. Auditing is a shared responsibility of management, auditors/reviewers, and applicable department workforce members.

All workforce members are expected to work with regulatory agencies and internal or external auditors in a direct, open, and honest manner and without actions taken that could mislead. Documents must never be concealed, damaged, or altered. In addition, all co-workers are expected to take an active role in their departments' actions to assure the prompt and proper resolution and implementation of audit/review recommendations.

Compliance Program

To assist management in communicating and implementing the Standards of Conduct, Lifesong Hospice and Palliative Care maintains a compliance program. The Board of Trustees is committed to maintaining an organizational culture that encourages ethical behavior as well as the prevention, detection, and resolution of instances of conduct that do not conform to the laws, standards, and payer requirements for hospices. The Board is ultimately responsible for ensuring that Lifesong Hospice and Palliative Care has an active and effective compliance program. The Board also has final authority and responsibility for actions taken on identified issues, concerns, and recommendations.

The Compliance Officer is responsible for the day-to-day oversight and operation of the compliance program. The Compliance Officer has the authority to review all documents and other information that are relevant to compliance activities. S/he may also investigate the contracts and arrangements made with other parties, and is the chair of the Compliance Committee.

The Compliance Committee oversees the implementation of the compliance program and collaborates on compliance initiatives, including compliance policies and procedures, an annual review of the compliance program, and reports. The committee oversees audits and reviews the effectiveness of the compliance program. **Tools used to support the effectiveness of the compliance program may include:**

- Standards of Conduct
- Annual Conflict of Interest disclosures for leadership, specific providers, and members of the Board of Trustees
- Assignment of Compliance Officer
- A Compliance Hot Line for reporting actual or suspected violations without fear of retaliation
- New hire and annual education and regulatory updates for staff when needed
- Internal and external auditing and monitoring programs with action plans for improvement when applicable
- Organizational enforcement of compliance related issues
- Screening mechanisms to assure co-workers are qualified, as well as vendors and contracted staff

Compliance Reporting

As a Lifesong Hospice and Palliative Care co-worker, if you become aware of any situation that could lead you or others to engage in actions that could result or have resulted in a compliance violation, you should consult your immediate supervisor. If the problem involves your supervisor or you do not feel comfortable talking to your supervisor, contact the Compliance Officer or call the Compliance Hot Line. If you call the Compliance Hot Line, you may leave your message anonymously, or leave your name and a contact number for the Compliance Officer to reach you. All reports will be investigated, and it may be necessary to contact you for additional information to complete the investigation. Anything reported to the Compliance Officer is strictly confidential and will not result in retaliation of any kind.

Lifesong Compliance Officer
Angus Patterson
717-585-6687
apatterson@lifesonghospice.com

Lifesong Privacy Officer
Amber Linkous
717-585-6687
alinkous@lifesonghospice.com

Lifesong Security Officer
Letha Klein
717-585-6687
lklein@lifesonghospice.com

GMFLC Corporate Compliance Officer
Carla Cherry
717-533-2474
Ccherry@countrymeadows.com

If you observe or suspect that false claims are being submitted or have knowledge of a prohibited practice, you must immediately report the situation to a supervisor, the Compliance Officer, or call the Compliance Hotline. Failure to report a known prohibited practice will subject you to disciplinary action up to and including termination.

Compliance Hotline: 1-888-470-3376 (available 24/7)

Final Points to Remember

The purpose of this booklet is to address some of the more common business ethics issues co-workers may experience during their employment with Lifesong Hospice and Palliative Care. Co-workers are responsible to be aware of policies and procedures pertaining to their work areas and should consult with leadership, the Compliance Officer, or Human Resources on areas of uncertainty.

Any co-worker who violates the Standards of Conduct, compliance laws, rules, regulations, or policies or procedures is subject to Human Resources policies governing disciplinary action, which may include oral or written reprimand, suspension, or termination of employment. If prohibited actions violate criminal laws, violations may result in personal criminal prosecution, fines, and even imprisonment.

Board members, co-workers, volunteers, vendors, and contracted staff are required to sign an acknowledgement confirming they have received, and are required to comply with the purpose and provisions of the Standards of Conduct. The Standards of Conduct are also posted on the Lifesong Hospice and Palliative Care website.

Ethical behavior depends on self-discipline and maintaining respect for yourself, our patients and their families, your co-workers, and your working environment. Upholding these Standards of Conduct will preserve the integrity of individuals, the reputation of Lifesong Hospice and Palliative Care, and the trust and confidence of our patients and their families and the communities we serve.

Standards of Conduct Acknowledgement

Date: _____ Name: _____ Position: _____
(Print) (Print)

I have received and read the Lifesong Hospice and Palliative Care's Standards of Conduct. I understand they represent the policies of Lifesong Hospice and Palliative Care.

If I have a concern about a known or suspected violation, I understand that I am to report the concern to my supervisor or the Compliance Officer. I understand that I can report this information anonymously and will not be retaliated against for making the report.

I will fully cooperate with members of the compliance team during any investigative process. If I have questions concerning the Standards of Conduct, I understand that I may consult my supervisor or the Compliance Officer.

Signature: _____