## Code of Conduct 2014–2015



# L.A. Care conducts all activities and operations in compliance with applicable laws, regulations, and contractual obligations.

#### Standards of Conduct

L.A. Care Board Members, Employees, temporary staff, and Contractors shall not lie, cheat, steal or intentionally or unintentionally violate any laws in connection with their employment and/or engagement with L.A. Care.

L.A. Care shall market its services in a truthful and accurate way, relying on the merit of its services. All marketing efforts shall be in compliance with all applicable laws and regulations.

L.A. Care shall refrain from conduct which would violate the laws applicable to fraud, waste and abuse detection and prevention. L.A Care expects and requires that its Board members, Employees and Contractors abide by those laws that prohibit direct or indirect payment in exchange for the referral of patients or services paid by Federal, State, and/or other funds.

L.A. Care funds, property, and/or resources shall not be used for political activity. At no time may an L.A. Care Board Member, Employee, or Contractor imply that his or her personal political views represent those of L.A. Care.

L.A. Care shall not do business with any Provider, Consultant, or Contractor if it or any of its officers, directors or employees are, or becomes excluded by, debarred from, or ineligible to participate in any Federal or State health care program, or is convicted of a criminal offense in relation to the provision of health care.

L.A. Care Board Members, Employees, and Contractors shall not unlawfully discriminate on the basis of race, color, religion, gender, national origin, ancestry, age, physical disability, mental disability, medical condition, family care leave status, veteran status, marital status, sexual orientation or any other category protected under applicable laws.

L.A. Care shall strive to provide a work environment free from violence, discrimination, and harassment for all its Employees and Contractors.

L.A. Care shall not provide or accept kickback, bribes or any other illegal form of compensation or incentive to increase its membership or to receive favorable treatment from providers, vendors, or other contractors

### L.A. Care is committed to the highest standard of business ethics.

#### **Standards of Conduct**

L.A. Care Board Members, Employees, and Contractors shall conduct business with candor and honesty and shall not make any false or misleading statements to any persons, Members or entities doing business with L.A. Care or about goods and services provided by L.A. Care.

L.A. Care Board Members, Employees, and Contractors shall conduct business with candor and honesty and shall not make any false or misleading statements to any persons, Members or entities doing business with L.A. Care or about goods and services provided by L.A. Care.

L.A. Care shall interact with Regulators in an open and honest fashion and will not mislead or provide false information at any time to these Regulatory bodies.



## Code of Conduct 2014–2015



L.A. Care shall produce reports and maintain accurate financial records and at no time, will L.A. Care misrepresent the financial picture of the agency. L.A. Care shall ensure that all transactions are executed in accordance with management authorization and are well documented to represent the true nature of the transaction.

L.A. Care records shall not be altered for any improper use, including the unauthorized payment or diversion of government funds.

L.A Care shall make appropriate clinical decisions by duly licensed and qualified medical professionals and shall not be improperly influenced by financial incentives.

L.A. Care Employees, Board members and Contractors shall report all suspected cases of fraud, waste, and abuse to their immediate supervisor or to the Compliance Officer immediately upon notice of a potential issue. L.A. Care shall maintain an anonymous Compliance Helpline at 1–800–400–4889 twenty-four hours a day, seven days a week where such reports can be made.

L.A. Care shall encourage Employees, Board members and Contractors to make such reports and shall prohibit retaliation or retribution for reports made in good faith regarding suspected activities.

L.A. Care and its Board members, employees and subcontractors shall comply and/or cooperate with the laws and regulations governing public agencies.

#### **Standards of Conduct**

L.A. Care shall provide access to public records to any person, corporation, partnership, firm or association requesting to inspect and copy such records in accordance with the California Public Records Act, California Government Code Sections 6250 et seq. and L.A. Care policies.

L.A. Care, Board members, and Employees shall not make gifts of public funds or assets, or lend credit to private persons without adequate consideration unless such actions clearly serve a public purpose consistent with the mission and authority of the agency and are otherwise approved by L.A. Care's legal counsel and are in compliance with applicable law.

L.A. Care, Board members and Employees shall comply with requirements relating to the notice and operation of public meetings in accordance with the Ralph M. Brown Act, California Government Code Sections 54950 et seg.

L.A. Care Board members, Employees and Contractors shall comply with applicable laws and L.A. Care policies relating to gifts, honoraria, filing of Form 700 and conflicts of interest.

L.A. Care, Board members, employees and contractors shall maintain all confidential information in accordance with applicable law and shall not disclose any confidential or proprietary information except as specifically authorized by L.A. Care policy and applicable law.

#### **Standards of Conduct**

L.A. Care shall maintain all personal information contained in employee personnel files in a manner that ensures the confidentiality of the record in accordance with applicable law.

L.A. Care shall safeguard proprietary information including contractor information and proprietary computer software in accordance with the requirements in contract or law.



## Code of Conduct 2014–2015



L.A. Care shall conduct all business relationships at arm's length in fact and in appearance from improper inducements and in accordance with applicable law and ethical standards.

#### **Standards of Conduct**

L.A. Care, Board members, and Employees shall not profit in any way or gain a business advantage by providing or accepting any type of inducement from any person or entity with which L.A. Care does or plans to do business.

L.A. Care, Board members, and Employees shall avoid engaging in actual or perceived favoritism toward a supplier, contractor, consultant, vendor, or provider. L.A. Care shall participate in a public procurement process when choosing business associates in accordance with L.A. Care policy and applicable law.

L.A. Care, Board members and Employees shall conduct their activities free from impropriety or the appearance of impropriety that might arise from the influence of those activities on L.A. Care's business decisions. L.A. Care, Board members, and Employees shall not engage in outside interests that could interfere with making non-biased business decisions of behalf of L.A. Care.

L.A. Care, Board members and Employees may not permit the use of his or her name in any way that would imply a business connection with any vendor, contractor or association of contractors.

L.A. Care, Board members, Employees and Contractors have a duty to comply with L.A. Care's Compliance Program and such compliance shall be a condition of their respective appointment, employment or engagement.

#### **Standards of Conduct**

L.A. Care requires that all Board members, Employees, Contractors, Providers, and Suppliers who are required to be licensed, credentialed, certified and/or registered in order to furnish goods or services to L.A. Care shall have valid and current licensure, credentials, certification and/or registration as applicable.

L.A. Care, Board members, Employees and Contractors are required to promptly report suspected violations of any statute, regulation or guideline, applicable to Federal and/or State health care programs or one of L.A. Care's policies and/or its Compliance Program.

L.A. Care may impose disciplinary action on Board members, Employees or Contractors for failure to comply with its Compliance Program, including the Code of Conduct, policies, and/or applicable statutes, regulations and guidelines. Failure to comply with the L.A. Care Compliance Program may range from verbal correction to termination in accordance with L.A. Care policies.

L.A. Care, Board members, Employees and Contractors shall not be currently suspended, terminated, debarred, or otherwise ineligible to participate in any Federal or State health care program, including Medicare and Medi-Cal. Board members, Employees and Contractors

must disclose to L.A. Care if they are currently suspended, terminated, debarred, or otherwise ineligible to participate in any Federal or State health care program including Medicare or Medi-Cal.

