



# Code of Ethical Conduct

*Care for who I am.*



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# An important message from our Chief Executive Officer

Our company is built on our commitment to provide compassionate, high-quality care and service to our patients and their families. Our reputation for providing this high standard of care and doing so in an ethical manner is what distinguishes Compassus from our competitors. Therefore, it is critical that we act with **absolute integrity and transparency** when conducting business on behalf of the Company. To act with integrity means doing what you say you will do, **doing the right thing** even when no one is watching, for no other reason than it is the right thing. That very ethical foundation – do the right thing – is woven into each strategic imperative, business priority, operational initiative, and the vision the Company seeks to achieve.

Through our behavior, we each brand Compassus with every daily interaction. Therefore, the Compassus Code of Ethical Conduct provides direction to govern those interactions. Compassus and all of our colleagues must follow the Code of Ethical Conduct with respect to all those with whom we interact, including patients and their families, regulatory agencies, colleagues, payers and business partners. Colleagues have the individual responsibility and collective accountability to uphold the Code of Ethical Conduct, as the cornerstone of the Compassus Ethics and Compliance Program.

Our Code of Ethical Conduct is based upon our shared core values of *Compassion, Integrity, and Excellence*, which guide our actions. Adherence to our Code is critical in achieving success through our **Six Pillars of Success**:

1. Regulatory compliance
2. Colleagues and culture
3. Quality
4. Service excellence
5. Growth
6. Financial performance

The health care industry is highly regulated; almost every activity, from ordering drugs to billing for services rendered, is covered by important rules and regulations, many of which have been adopted to safeguard the interests of beneficiaries in the Medicare and Medicaid programs. While the Code will not address every situation, it provides guidance that will help ensure our work is done with integrity and in accordance with applicable laws, rules and regulations.

If you have questions about any part of our Code, or if you encounter any situation that you believe may violate its provisions, you should immediately contact your supervisor or another leader. **If you are not completely satisfied with the response of your supervisor or other leader, you must promptly report your concerns to the Compliance and Ethics Department** via email to [Compliance@compassus.com](mailto:Compliance@compassus.com), or you can report a concern anonymously to the **ComplianceLine** at **1-866-569-7193**.

Please become thoroughly familiar with this Code, as it is now your own. Your adherence to its spirit, as well as its specific provisions, is critical to our success. Please join me in committing to our Code of Ethical Conduct.



James A. Deal  
Chief Executive Officer

# About Compassus

Compassus is a post-acute care company providing four service lines: home health, home infusion, palliative care and hospice. As mentioned throughout the Code of Ethical Conduct, Compassus is inclusive of all service lines and Compassus-managed business partners.

With a culture based on three core values – **Compassion, Integrity, and Excellence** – Compassus is dedicated to providing excellence in care to our patients and their families. We do this by carrying out our daily Compassus activities in a way that exemplifies our Six Pillars of Success. Through **Care Delivery, the Compassus Way**, we strive to be a trusted and valued caregiver so our patients and families can focus on their time together.

## Our higher purpose

Profoundly advancing the well-being and honoring the dignity of those we serve, helping make the world a better place — one family at a time.

## Our vision

Compassus is leading the transformation of health care delivery: continuously and measurably improving the quality of person-centered, physician-driven, team-based care.

As we carry out our daily Compassus activities, we keep our core stakeholders (patients and families; colleagues; health care providers; Medicare, payers and insurers; and shareholders and partners) at the forefront of our work. By living our vision, we continually exceed the expectations of our stakeholders.

**PATIENTS & FAMILIES** — Compassus colleagues deliver care that honors our self-determined goals and preferences, centered on improving comfort, safety and quality of life while reducing family stresses.

**COLLEAGUES** — Compassus provides me the opportunity to have meaningful work. I am supported in my quest to expand my abilities and achieve my aspirations. I am trusted, valued and respected.

**HEALTH CARE PROVIDERS** — We recognize Compassus as a partner serving as a natural extension of our team. Compassus is invested in our success and helps us help our patients make difficult choices while delivering superlative care.

**MEDICARE, PAYERS & INSURERS** — Compassus delivers outcome-based value through high-quality patient-centric care, expanding access to qualified individuals while putting compliance at the forefront and providing health care system cost savings.

**SHAREHOLDERS & PARTNERS** — Compassus is a visionary and valued partner, known for an unwavering commitment to transparency, compliance and innovation, delivering the highest quality of care through a scalable platform with best-in-class practices. Compassus exceeds our expectations.

## SIX PILLARS OF SUCCESS BUILT WITH *Compassion • Integrity • Excellence*

*Regulatory*



*Colleagues*



*Quality*



*Service*



*Growth*



*Financial*



# Getting to know the Code

The Code of Ethical Conduct (Code) is the defining document of our Compassus Ethics and Compliance Program, which has been established to promote an ethical corporate culture – one that requires compliance with all applicable laws, rules and regulations and fosters integrity, objectivity and trust. Ethical behavior is the foundation upon which our Six Pillars of Success are grounded. Ethics goes beyond compliance rules, regulations and policies. Those define what we must do, and ethics is what we should do.

## Who must follow the Code?

Our Code applies to anyone who works for, or on behalf of, Compassus. It applies without exception to all members of the Board of Directors, colleagues and associates (collectively, Colleagues), volunteers and as applicable, contractors.

## What if a potential violation occurs?

If someone's actions violate our Code, our policies or procedures, or applicable laws or regulations, it can harm both Compassus and our patients. Therefore, open and candid reporting is encouraged so that issues may be addressed and corrected as soon as possible. When possible misconduct is identified, we review it carefully and take appropriate steps to correct it, including imposing disciplinary action, when appropriate.

All Colleagues must promptly report potential violations. Failure to report suspected or perceived violations of the Code or any other form of non-compliance may result in disciplinary action, up to and including termination.

## How do I report?

When reporting, we encourage you to report to your supervisor or an appropriate member of leadership who can address and resolve the concern. The compliance reporting program exists if you feel you cannot discuss your concerns with leadership or you have done so, and they have not been addressed.

For compliance or business ethics matters, e-mail the Ethics and Compliance Department at [Compliance@compassus.com](mailto:Compliance@compassus.com) or write to the Chief Ethics and Compliance Officer: 10 Cadillac Drive, Suite 400, Brentwood, TN 37027.

For a workplace-related matter that cannot be resolved through your chain of command, contact Colleague Relations at [ColleagueRelations@compassus.com](mailto:ColleagueRelations@compassus.com).

You may report anonymously by calling the **ComplianceLine**, 24 hours a day / 7 days a week at **1-866-569-7193**. Compassus has engaged an independent, third-party vendor to manage the **ComplianceLine** and provide anonymity to you. Your call will not be traced or recorded.

Colleagues will not always be privy to the results of investigative or corrective action. All reports will receive serious consideration and investigation, as warranted.

## Reporting patient adverse events

When a Colleague is made aware of a potential patient adverse event, whether or not there is evidence of abuse/neglect, that Colleague is required to immediately report the event to the patient's registered nurse case manager (RN) and/or the Director of Clinical Services for evaluation. When notified of an adverse event related to a patient, the RN is responsible for performing an assessment of the patient's status regarding physical injury and safety needs. The RN performing the assessment will render appropriate care and ensure the Plan of Care reflects the patient's status and needs related to safety and/or any injuries connected to the event. The RN will also notify the appropriate members of the Interdisciplinary Team (IDT), including the

patient's physician, to determine if treatment intervention is required. A written report of the event is completed by the RN and provided to the Executive Director/Area Executive of Clinical Operations within 24 hours of the event. All adverse events are reviewed monthly at the QAPI committee meeting and evaluated for trends to inform performance improvement needs. Serious adverse events, as defined in the Adverse Event Reporting Policy, are reported promptly to the Chief Ethics and Compliance Officer and the applicable program's Governing Body.

## Can I report without fear of retaliation?

No one is permitted to engage in retaliation or any form of harassment or discrimination against a Colleague who reports in good faith. This includes acting as a whistleblower in accordance with the Federal False Claims Act or other law. These protections are specifically established in the Duty to Report and Non-Retaliation Policies.

Anyone at any level who engages in retaliation, discrimination or harassment is subject to discipline, up to and including termination. Open and candid reporting of errors and other issues is encouraged, so that such issues may be addressed and corrected at the earliest possible time. If you believe you are being retaliated or discriminated against or harassed because you have reported a concern, **you must promptly report this concern of retaliation to the Compliance and Ethics Department** at [Compliance@compassus.com](mailto:Compliance@compassus.com); or if you prefer, you can report the concern by calling the **ComplianceLine** at **1-866-569-7193**.



# Our Pillars of Success in practice

## Pillar 1: Regulatory compliance

### COMPLIANCE WITH LAWS, RULES, REGULATIONS, AND COMPASSUS POLICIES AND PROCEDURES

A fundamental principle on which we operate is compliance with all laws, rules, and regulations that apply to our business. Company policies and procedures, and training programs, have been developed to guide our Colleagues to operate within these laws, rules and regulations. Colleagues are expected to understand and adhere to all company policies and procedures. If you are ever unsure whether any action is appropriate, ask your supervisor. If your supervisor doesn't know the answer to your question, or if you are not comfortable with the answer you receive, ask another leader or contact our Ethics and Compliance Department. Remember that it is always better to ask a question before taking any action that may be improper.

### COOPERATION WITH SURVEYS, AUDITS AND INVESTIGATIONS

Our programs are frequently subject to internal and external surveys, audits and investigations. This includes state and federal regulatory surveys and investigations, probe audits, internal surveys conducted by Colleagues or third-party consultants, compliance investigations and accreditation surveys. Colleagues are expected to cooperate fully and provide truthful and accurate information when responding to those conducting surveys, audits, inquiries or investigations.

## Pillar 2: Colleagues and culture

### RESPECT FOR THE INDIVIDUAL

We all deserve to work in an environment where we are **treated with dignity and respect**. Compassus is committed to creating such an environment as it brings out the full potential in all our colleagues, which, in turn, contributes directly to our business success.

Compassus is an equal opportunity employer and is committed to providing a **safe and positive workplace that is free of discrimination** of all types and from abusive, offensive or harassing behavior. Compassus will not tolerate any form of discrimination based on race, color, religion, sex (including pregnancy and childbirth), gender (including gender identity and gender expression), sexual orientation, national origin, age, disability, genetics, or marital status. The Company will not tolerate discrimination or harassment based upon these characteristics or any other characteristics protected by applicable federal, state or local law. The Company also will not tolerate workplace bullying based upon any characteristics protected by applicable federal, state or local law.

Any colleague who feels harassed or discriminated against should report the incident to their manager, the Compliance Department or to Human Resources.

Colleagues are expected to support an inclusive workplace by adhering to the following conduct standards:

- Treat others with dignity and respect at all times.
- Address and report inappropriate behavior and comments that are discriminatory, harassing, abusive, offensive or unwelcome.
- Foster teamwork and participation, encouraging the representation of different colleague perspectives.
- Seek out insights from colleagues with different experiences, perspectives and backgrounds.
- Avoid slang or idioms that might not translate across cultures.
- Confront the decisions or behaviors of others that are based on conscious or unconscious biases.
- Be open-minded and listen when given constructive feedback regarding others' perception of your conduct.



Whether a colleague is on duty or off, conduct can reflect on Compassus. Conduct outside of work can have the potential to impact the company's reputation. Colleagues are asked to refrain from any behavior or conduct outside of work that might be viewed as harmful or detrimental to their co-workers, patients and their family members, programs, agency, affiliates, and its community or by the general public.

### **COLLABORATIVE AND PROFESSIONAL CULTURE**

We promote a collaborative culture and an open and supportive environment, which encourages direct and honest communication. We strive for excellence through continuous improvement using collaboration, creativity and critical thinking. Due to the vulnerability of the patients we serve, our colleagues are held to the highest standard of federal health care program – Medicare/Medicaid – requirements. Our goal is for Colleagues to develop their career with Compassus that aligns with their higher purpose and the company's vision, enabling them to be co-creators of success.

### **CONFLICTS OF INTEREST**

A "conflict of interest" occurs when a Colleague's private interests interfere (or appear to interfere) with the interests of the company as a whole or one of its programs/agencies. A potential conflict may arise from business relationships, financial investments, part-time jobs, or other activities that could influence or appear to influence your judgment or duties on behalf of the company.

An actual, potential or perceived conflict of interest occurs in those circumstances where a Colleague's judgment could be affected because the Colleague has a personal interest in the outcome of a decision over which the Colleague has control or influence. A personal interest exists when a Colleague or their relative stands to directly or indirectly gain as a result of a decision. "Relative" is defined as a spouse, parent, child, grandparent, grandchild, brother, sister, aunt, uncle, cousin, niece, nephew, or the equivalent in-law, step relationship, or half relationship (e.g., half-brother) of any of these. This definition also applies to those who are in significant relationships but not married. Avoid making any business decision that involves yourself or Relatives without first making appropriate disclosure and seeking appropriate approval through your leader.

A Colleague's part-time/PRN employment with another company must not result in a violation of stated Compassus performance standards, and it must not compromise Compassus' reputation among patients, referral sources and/or the general public. Compassus is reimbursed for services rendered under federal health care programs, such as Medicare and Medicaid, and as such, is subject to a variety of laws, regulations and requirements, including those that govern referral source relationships. This requires careful consideration of Colleagues who have a financial relationship, including employment, with a referral source. Colleagues working part-time/PRN in another health care capacity must notify their leader. The Chief Ethics and Compliance Officer will make the final determination whether the role creates a conflict of interest.

Due to the potential for perceived or actual conflicts, a Colleague may not supervise a Relative. Colleagues and leaders are responsible for disclosing personal relationships within the organization's reporting structure to their supervisor and Colleague Relations in Human Resources. Leaders should guard against hiring candidates whose familial relationship with a current colleague may jeopardize teamwork, supervision and Compassus culture.

A Colleague may not serve as a member of a Relative's Compassus assigned care team, and colleagues are responsible to disclose such relationships to their supervisor and Colleague Relations in Human Resources.

### **PUBLIC POLICY ADVOCACY**

We encourage our Colleagues to participate in public policy advocacy to educate and inform elected officials and their staff. However, all advocacy on behalf of Compassus must be kept separate from a Colleague's public policy advocacy on issues of personal interest. Personal public policy advocacy should never interfere with Compassus work. Colleagues should never use Compassus resources, such as equipment, supplies, time, facilities, phones or administrative support in connection with any sort of personal public policy activity.

**Compassus PAC** is a voluntary political fund supported solely by the personal contributions of eligible Compassus employees and Board Members. Our PAC provides financial support to federal political candidates who share the company's views on public policy issues. Federal law prohibits the use of corporate funds to make contributions to candidates or their political committees.

### **POLITICAL ACTIVITIES**

We encourage our Colleagues to participate in political activities to elect or re-elect candidates to public office; however, all actions must be kept separate from a Colleague's responsibilities at Compassus. Political activities should never interfere with Compassus work. Colleagues should never use Compassus resources, such as equipment, supplies, time, facilities, phones or administrative support in connection with any sort of political activity.

## **Pillar 3: Quality**

The primary payer for Compassus service lines is Medicare, a federal health care program, which is managed by the Centers for Medicare and Medicaid Services ("CMS"). CMS has promulgated a series of regulations specific to each Medicare Part A provider type known as Conditions of Participation (COPs), which govern areas such as governance, patient care and patient rights, care planning, quality assurance and performance improvement (QAPI), program administration, infection prevention and control, quality, staffing and competencies, compliance with health and safety laws, emergency preparedness, and clinical records. Our Code is aligned with the COPs and our dedication to provide the highest quality of care and to model ethical business practices – what we should do.

### **INTERACTION WITH PATIENTS, FAMILY MEMBERS AND CAREGIVERS**

Patients and their families are our first priority, and we are committed to treating all patients, their family members and their caregivers with compassion, dignity and respect. We welcome the involvement of our patients and their loved ones as appropriate in decisions affecting their Plan of Care. We strive to treat our patients and their families in the same manner that we would desire to be treated.

### **QUALIFICATIONS AND TRAINING OF COLLEAGUES**

With our commitment to serve our vulnerable patients with the highest quality of care, Colleagues must meet the Company's qualifications and training standards as well as those of the federal health care programs in which we participate.

All Colleagues, prior to starting work, are subject to background checks and sanction screening as required by federal and state laws and company policy. We will not employ or otherwise engage any individual whom we know to have failed the background check requirements or to have been excluded from participating in any federal health care program.

Colleagues are responsible for obtaining and maintaining all required professional licenses, certifications or other accreditations, and to comply with the ethical standards of their respective professional organizations. Colleagues are required to report any occurrence that may disqualify them from fulfilling their job responsibilities to their supervisor and to Colleague Relations in Human Resources. Colleagues are expected to perform only those professional duties that are within their authority to perform.

The company will provide Colleagues with mandatory job-related training to ensure that they are able to perform their duties in compliance with applicable laws and regulations and Compassus policies and procedures and to continue their professional development. All Colleagues are required to complete such training.

Supervisors must ensure that only properly screened, qualified and trained Colleagues are assigned to care for our patients.

## CARE DELIVERY, THE COMPASSUS WAY

Care Delivery, the Compassus Way is a methodology for standardizing how Compassus delivers care. It is more than a revolutionary approach to patient care. It is also an industry-leading methodology for patient-outcomes reporting. It is based on the universal needs – Comfort, Safety, and Quality of Life – of individuals “caught” in the health care system due to serious illness. It defines the perspectives required of the teams that care for these individuals, standardizes the steps taken with each patient interaction to ensure a positive and consistent experience for our patients and families/caregivers and defines, measures and reports outcomes. Colleagues are expected to understand and adhere to the principles and spirit of Care Delivery, the Compassus Way.

## PLANS OF CARE

For each patient admitted to our hospice and home health service lines, a Plan of Care is tailored to meet the specific needs of the patient and family/primary caregiver. It is established by the IDT in conjunction with the patient’s attending physician and family/primary caregiver, as appropriate. The Plan of Care is reviewed on a regular basis and revised as necessary to provide relief of the patient’s symptoms and appropriate management of their disease. Palliative care services are considered a medical specialty; and therefore the Plan of Care is developed and directed by the patient’s attending physician in collaboration with the palliative nurse practitioner/physician.

Regardless of the service line, it is imperative that patient care be provided in accordance with the Plan of Care and documented accurately and in a timely manner. The Plan of Care should always be made a part of the permanent patient record.

## Pillar 4: Service excellence

### SERVICE COMMITMENT

We strive to maintain a culture of service excellence and have developed the Compassus Service Commitment, an eight-point promise to our patients and their family members and to our referral sources. It is the top priority of all Colleagues, both individually and collectively, to fulfill each individual component.

### COMPASSUS SERVICE COMMITMENT

**SERVICE** — Excellent patient care and service are our highest priorities. Compassus will always be the leader in quality care in each community we serve.

**URGENCY** — We will initiate contact with patients/families as appropriate to their care needs within 24 hours of referral.

**CARING** — We will provide compassionate, timely and effective care management to patients and offer support to their families, 24 hours a day.

**RESPONSIBILITY** — We recognize the special relationship between physicians and their patients, and we offer to provide those physicians regular patient status reports on any schedule they request.

**COMMUNICATION** — Telephone calls to our staff will always be answered promptly and politely. Trained staff will respond to urgent calls made to our after-hours call service within 15 minutes, 24 hours a day.

**RESPONSE** — We will address patient, family or physician questions, issues or concerns within 24 hours of the appropriate staff being notified about the issue.

**COMPASSION** — We will care for our patients and their families with the same compassion, dignity and respect we give our own families.

**FEEDBACK** — We regularly survey our patients, families, facilities and physicians to ensure we are meeting our service commitment to the people, professionals and communities we serve.

## PATIENT PRIVACY

In serving our patients and their families, we collect sensitive information about our patients' medical conditions, treatments, family history and/or medications. Much of this information is personal in nature and must be considered highly sensitive. We must maintain the confidentiality of this information at all times.

All of our Colleagues shall comply with the Health Insurance Portability and Accountability Act (HIPAA) in accessing, using, processing or disclosing protected health information (PHI). (HIPAA is a law which protects the confidentiality of an individual's PHI.) In addition to HIPAA, there are state laws that establish data protection requirements. Protections for PHI might differ by state. You must know and comply with all information protection and privacy policies and laws that apply to your role at Compassus.

Each Colleague shall be familiar with our *Notice of Privacy Practices* because, as a Colleague, you are required to comply with the terms of this document. We will not share PHI except when authorized under HIPAA for treatment, payment or health care operations, or as required by law. We will take all reasonable measures to safeguard PHI in all forms, whether paper or electronic. We will not conduct discussions of patient issues in public areas or with non-authorized individuals. Non-authorized individuals will not be allowed to accompany Colleagues to patient visits.

In accordance with the Compassus Duty to Report Policy, Colleagues are responsible to promptly report any potential HIPAA privacy violations by contacting the Ethics and Compliance Department at [Privacy@compassus.com](mailto:Privacy@compassus.com) or call the **ComplianceLine** at **1-866-569-7193**. You may also contact your leader or the Ethics and Compliance Department with any questions regarding HIPAA Privacy matters.

## ETHICAL TECHNOLOGY AND DATA MANAGEMENT

As a participant in the health care industry, Compassus has ever increasing data and evolving technology. We use this data and technology to access new insights in business operations and quality care delivery. With this collection of sensitive information also comes the responsibility to safeguard this data and ethically use technology. Technology and data security are paramount to uphold the trust of our patients and business partners. Therefore, Compassus maintains a robust security framework with appropriate administrative, technical and physical safeguards. Colleagues shall remain informed through workforce training on job-specific data security requirements and appropriate use parameters. Colleagues shall continually demonstrate both legal and ethical use of sensitive data, in particular patient data, as trusted stewards of this information.

## GIFTS FROM PATIENTS/FAMILY MEMBERS

Compassus prohibits receiving cash or cash equivalents (gift cards) or anything of value from patients or family members. If a patient or family member offers you a gift, you should thank them for their generosity and politely request the gift be directed to the charitable foundation associated with your program or agency, citing company policy. Any item of appreciation, such as food or floral arrangements, provided to Colleagues by patients or family members should be shared by the staff. Colleagues should notify their leader of any gifts offered by patients or family members.

## Pillar 5: Growth

### GROWTH AS AN INDICATOR OF SUCCESS

Growth of a program is an affirmation that the program is achieving success in Pillars 1 through 4 and an indication that the program is meeting the needs of the community it serves. We are committed to "Growing Right," with emphasis on our first Pillar, Regulatory Compliance. Only ethical growth is sustainable, as growth that is driven by non-compliant or unethical conduct can create serious exposure for Compassus and individual Colleagues, such as fines, penalties, sanctions, etc.

As a participant in federal health care programs, Compassus is subject to a variety of laws, regulations and requirements designed to combat fraud, waste and abuse and recover losses resulting from fraudulent activity.

We are committed to detecting and preventing fraud, waste and abuse. Our policies, procedures and processes have been designed and developed to ensure our compliance with applicable federal health care program requirements.

If you become aware of a potential violation of federal health care program requirements, **you are required to promptly contact the Ethics and Compliance Department** at [Compliance@compassus.com](mailto:Compliance@compassus.com), or call the **ComplianceLine** at **1-866-569-7193**.

### **ADMISSIONS**

Only patients meeting established eligibility criteria shall be admitted to and remain on our services. Our physician lead teams work to develop effective plans of care that are unique to each patient. These care plans are updated on a regular basis in response to changes in the patient's condition and needs. As those needs change, our clinical leaders across Compassus work to ensure appropriate services are being rendered based on the patient's current condition and that appropriate guidelines and regulations are consistently met.

All patients that meet established admission criteria shall be admitted, without regard to age, race, color, sex, national origin, disability, religion or any other protected characteristic. Compassus will not tolerate discrimination based upon these characteristics or any other characteristics protected by applicable federal, state or local law.

### **BUSINESS ENTERTAINMENT AND GIFTS**

Gifts and entertainment should never be offered or accepted in exchange for or as a reward for referrals. Personal/individual gifts should not be given to referral sources. Any type of seasonal gift provided to physicians or facilities should be something to be shared by the staff. Cash and cash equivalents should never be given or received. Marketing lunches/dinners, as a general guideline, should be reasonable, of nominal value, and approved by your Executive/Department Director beforehand. All gifts and entertainment should be thoroughly documented on expense reports or check requests, with specifics of who attended, the purpose and date of the expenditure, and where the event took place.

### **ARRANGEMENTS WITH PHYSICIANS AND OTHER REFERRAL SOURCES**

All financial arrangements with physicians, nursing homes or other referral sources must be necessary for legitimate business purposes, set forth in writing at fair market value, and signed by all parties involved. We will not pay for referrals, nor will we accept payment for referrals made to other entities. We will not consider the volume or value of referrals in establishing compensation under our agreements with physicians, nursing homes or other referral sources. All financial arrangements involving physicians, nursing homes or other referral sources must comply with applicable laws and regulations and company policies and be documented in company-approved contracts.

## **Pillar 6: Financial performance**

Successful financial performance is the direct outcome of achieving success in the first five Pillars and managing our programs in a fiscally responsible manner. We strive to be good stewards of our limited financial resources and federal health care program benefits.

### **BILLING FOR SERVICES RENDERED**

All claims to government and commercial payers must accurately reflect the dates of service and level of care to our patients, and they must comply with all pertinent billing rules and regulations.

We will not tolerate false, fictitious or fraudulent claims, including those resulting from the documentation by a Colleague of services or items that were not actually performed or provided to the patient.

Any billing errors identified through audit processes or other means shall be promptly corrected. Any overpayment received from federal health care programs, such as Medicare and Medicaid, or any other payer source must be promptly returned, but no later than 60 days from identification.

If you have reason to believe that a Colleague or contractor is engaging in false or improper billing practices, **you are required to promptly contact the Ethics and Compliance Department** at [Compliance@compassus.com](mailto:Compliance@compassus.com), or call the **ComplianceLine** at **1-866-569-7193**.

## **MAINTAINING ACCURATE BUSINESS AND MEDICAL RECORDS**

Colleagues are expected to maintain complete and accurate business and medical records for which they are responsible. This includes, but is not limited to, time records, financial reports, accounting records, expense reports, check requests, billing records, patient records, Colleague records and any other business or medical record documents. Records should never be destroyed or altered to cover up an error or omission, or for the purpose of receiving any payment to which the company or the Colleague is not entitled. Colleagues should never sign someone else's name to a medical record document.

## **SUMMARY OF YOUR RESPONSIBILITIES UNDER OUR CODE OF ETHICAL CONDUCT**

- Always act in a manner consistent with our Code of Ethical Conduct.
- Learn and understand the requirements of your specific job, including the laws and regulations and policies and procedures that affect your specific job.
- Always follow the "Golden Rule" – treat our Colleagues, patients, families and others with whom you interact in the same manner with which you would desire to be treated.
- Never share the protected health information of any individual without proper authorization.
- Never knowingly falsify information in a medical record.
- Never sign another individual's name to a medical record document.
- Never take action that would result in billing for services that were not provided.
- Never give or accept money or anything of value in exchange or as a reward for referrals/continued business.
- Never participate in business relationships that pose a conflict of interest with your Compassus responsibilities.
- If you are unsure whether your intended action is appropriate, always ask before you act.
- Promptly report any potential violation of our Code, our policies and procedures or applicable laws and regulations. If you err on the side of reporting, you've fulfilled one of your core obligations as a Colleague!

## **ADDITIONAL RESPONSIBILITIES FOR MANAGERS AND LEADERS**

- Promote the Code and ensure Colleagues are actively applying its principles.
- Provide advice, guidance and education to Colleagues to ensure proper understanding of applicable laws and regulations and our policies and procedures.
- Maintain a proactive and non-retaliatory work environment where Colleagues feel free to ask questions and are encouraged to identify, report and resolve concerns.
- Be respectful and provide appropriate and timely responses to questions or concerns.
- Keep the Ethics and Compliance Department promptly informed of compliance and business ethics matters.
- Set a proper example for Colleagues to follow.

## RESOURCES FOR SEEKING GUIDANCE AND REPORTING

Matter/Topic	Department	Contact information
Compliance and business ethics matter	Ethics and Compliance Department	Compliance@compassus.com
Workplace matters	Colleague Relations	ColleagueRelations@compassus.com
Legal matters	Legal Department	Legal@compassus.com
HIPAA privacy matters/HIPAA incident report	Compliance Department	Privacy@compassus.com
Licensure matters	Compliance Department	Licensure@compassus.com
Site surveys	Quality Department	dl_survey_notifications@compassus.com
Subpoena and medical record request	Legal Department	Legal@compassus.com
Contracts	Legal Department	Contracting@compassus.com
External audit requests*	Compliance Department	ExternalAudits@compassus.com

### ComplianceLine 1-866-569-7193

*\*External audit requests refer to requests received from outside of Compassus. Examples of external auditors include state and federal government agencies, government contractors, such as ZPICs and RACs, other payers or other similar organizations*

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