

Vista Policies and Procedures

Policy Name: Code of Conduct
Policy Number: CE 404
Policy Holder: Compliance Officer
Original Effective Date: November 5, 2018
Revision Date: N/A

Purpose

The Vista Code of Conduct reinforces the mission and values of Vista. It is designed on the principle that everything we do with our daily work will be, and should be, measured against the highest possible standards of ethical business conduct. We demonstrate the competence, skill, and integrity that is expected of our positions, and we behave with dignity and courtesy toward our coworkers, learners, and individuals we serve.

Vista sets the bar high for practical and aspirational reasons: *With the mission to advance and innovate, to improve lives, and to inspire hope for individuals with autism and their families.*

Board members, management, employees, volunteers, and independent contractors are expected to incorporate the principles of the Code of Conduct, “Code,” into practice. If any person covered by this Code believes that another employee or the organization as a whole may be falling short of our commitment, it is the responsibility of that person to adhere to the practice of “see something – say something.” Our success as an organization relies on every single person participating in honest, fair, and ethical behavior.

The Vista Code of Conduct is intended to provide general guidance in carrying out day-to-day activities within appropriate legal and ethical standards. This policy serves in tandem with HR 100 Standards of Professional Behavior. These two documents provide the framework for outlining appropriate legal and ethical standards of behavior and conduct. Questions or concerns about the application of the Code of Conduct should be directed to the Compliance Officer or Human Resources Director.

Code of Conduct

Vista supports a culture of diversity and inclusion. We treat everyone with respect, dignity, and courtesy. We do not tolerate discrimination against anyone at Vista, including visitors, employees, and individuals served, as outlined in HR 103 Nondiscrimination. Vista does not tolerate behavior that is disrespectful, hostile, intimidating, or harassing.

Respect for Individual Rights

Vista strongly believes in the worth of every individual, and in fostering the unique talents and abilities of our workforce and the individuals we serve. As providers of service, we have an ethical responsibility to make individuals feel secure in our programs and to treat everyone respectfully and with dignity. In addition to ethical responsibility, we have a legal responsibility to comply with

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all applicable laws and regulations related to individuals' rights. Vista provides service that is medically necessary and appropriate based on individuals' needs, aspirations, desires, and goals.

Individuals will not be discriminated against because of disability. Program services shall be made accessible to eligible persons with disabilities through the most practical and economically feasible methods appropriate to the individual service description. These methods include, but are not limited to, equipment redesign, the provision of aides, and the use of alternative service delivery locations. Structural modifications shall be considered only as a last resort among available methods.

Confidentiality and Information Security

Protecting confidential information is a Vista priority. We are trusted with personal information. Preserving this trust requires that each of us respects and protects the privacy and security of personal information. Confidential information includes protected health information (PHI) about an individual, employee records, and proprietary information about Vista business operations. We access confidential information and share it with others only when authorized to do so and for the purpose of doing our job. We follow applicable laws and policies when releasing confidential information. We investigate and report breaches of confidential information and take steps to secure our systems from unauthorized access and comply with information security policies.

Record Keeping and Reporting

Vista maintains accurate records concerning individuals served, employees, clinical procedures, research, and financial transactions. It is the responsibility of each of us, when engaged in recordkeeping on behalf of Vista (including employee time keeping, medical records, and patient billing), to be accurate and honest. For example:

- We do not sign another person's name to documents or share passwords
- We amend a medical record only in accordance with policy and applicable law
- We do not fabricate, falsify, or plagiarize when proposing, conducting, or reporting research
- Our financial records conform to applicable accounting principles and only represent fact

Vista retains documents for the length of time described in our document retention policies. Vista establishes and maintains a system of internal controls to provide reasonable assurances that all transactions are executed in accordance with applicable policy, law, and regulations.

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Billing Practices

Vista is committed to generating claims for payment of services with consistency and integrity to avoid fraud, waste, and abuse in healthcare operations. All Vista personnel are expected to comply with applicable laws and regulations with regard to claim submission. Vista only bills for medically necessary services rendered by eligible providers that are properly authorized, documented, and coded. We correct billing errors for which we have knowledge and refund payments received in error to third-party payers and individuals, with appropriate documentation. We respond to individual and payer questions concerning charges in an accurate and timely manner. With a critical eye, we establish and maintain internal auditing processes to ensure systems are operating efficiently to avoid claim submission errors.

Business and Community Relationships

Vista's relationships with the community and business partners are of the utmost value for our organization and the individuals we serve. Business relationships and transactions with vendors, contractors, and other third-parties are conducted with honesty, fairness, and integrity. Employees or individuals doing business on behalf of Vista may not give, solicit, or accept gifts, favors, services, entertainment, or other items of value from any person or entity with whom Vista does or proposes to do business.

Managing Conflicts of Interest

Vista staff and management disclose and appropriately manage conflicts of interest. Conflicts of interest are situations in which personal considerations may affect, or have the appearance of affecting, our loyalty and ability to fulfill our responsibilities to Vista.

Vista Resources

Vista is committed to using its resources for Vista purposes and not for personal gain. We spend Vista funds wisely, eliminate waste, and control operational costs without compromising the services we provide. We use physical assets for Vista purposes and we protect those assets from loss, damage, and theft. We do not waste supplies, equipment, space, or time. We protect intellectual property (IP) and respect patents, software licensing, copyright, and other IP agreements.

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Safety at Vista

Feeling safe in the workplace is a priority for Vista. We have an extensive safety program to reduce the risk of injury to our individuals served, employees, and visitors, and to ensure compliance with applicable federal, state, and local codes and regulations, as applied to the buildings we inhabit and services we provide. Vista strives to ensure that our program staff have appropriate information and training to develop safe working conditions and practices within their respective areas of expertise by using knowledge or safety principles to educate staff, design appropriate work environments, purchase appropriate equipment and supplies, and monitor the implementation of the processes and policies. We regularly evaluate the work environments for risk, hazards, and regulatory compliance issues.

Legal Compliance

Vista and its employees shall abide by all applicable laws and regulations. Directors, managers, supervisors, and employees are expected to be aware of all legal requirements applicable to their respective programs and duties. If in doubt about the ethics, legality, or appropriateness of a situation, employees should ask their supervisor or the Compliance Officer for clarification.

This Code is just one of the many resources available to Vista employees. It is impossible to spell out every possible ethical scenario we might face. Ultimately, we rely on each other to use good judgement and to uphold our Mission, Vision, and Core Virtues.

Compliance Officer Signature: _____ Date of Approval: _____