

HP3

Standards of Conduct and Individual Integrity

Collaboration

Growth

Commitment



Dear HP3 Colleagues:

As a leader in clinical documentation, coding and healthcare data, HP3 performs functions that are integral to the business and delivery of healthcare. As such, we share a responsibility with the industry to operate with identified values and principles that govern our business conduct. The way we approach every project, every sale of service, product or technology, all contact with customers, our relationships with competitors, and every business decision must be grounded in compliance with applicable law and the highest standards of honesty, integrity and fairness.

There is no corporate or individual quality more important than integrity. Integrity or “doing what you say you are going to do” is illustrated in the HP3 shared value of commitment. Integrity can be difficult to attain and keep, yet nearly impossible to regain once lost. The compliance and integrity of HP3 is predicated on the actions and decisions of every individual employee. Through our shared values, HP3 and every HP3 employee are committed to integrity in everything we do.

We developed this Standards of Conduct and Individual Integrity document to help guide all HP3 employees in applying legal and ethical practices to their everyday work. The Standards are designed to ensure that you can apply the information contained in the Standards with ease. While the Standards can neither cover every situation in the many activities of HP3, nor substitute for common sense, individual judgment or personal integrity, it is the duty of each HP3 employee to adhere to these Standards.

We have also developed more detailed policies, procedures and resources that are available to every HP3 employee on the HP3 Intranet. The Standards of Conduct and Individual Integrity are also available on the HP3 Intranet and www.hp3.com.

In short, our collective and individual success must be based on compliance with the law, fairness, integrity, and a commitment to quality.

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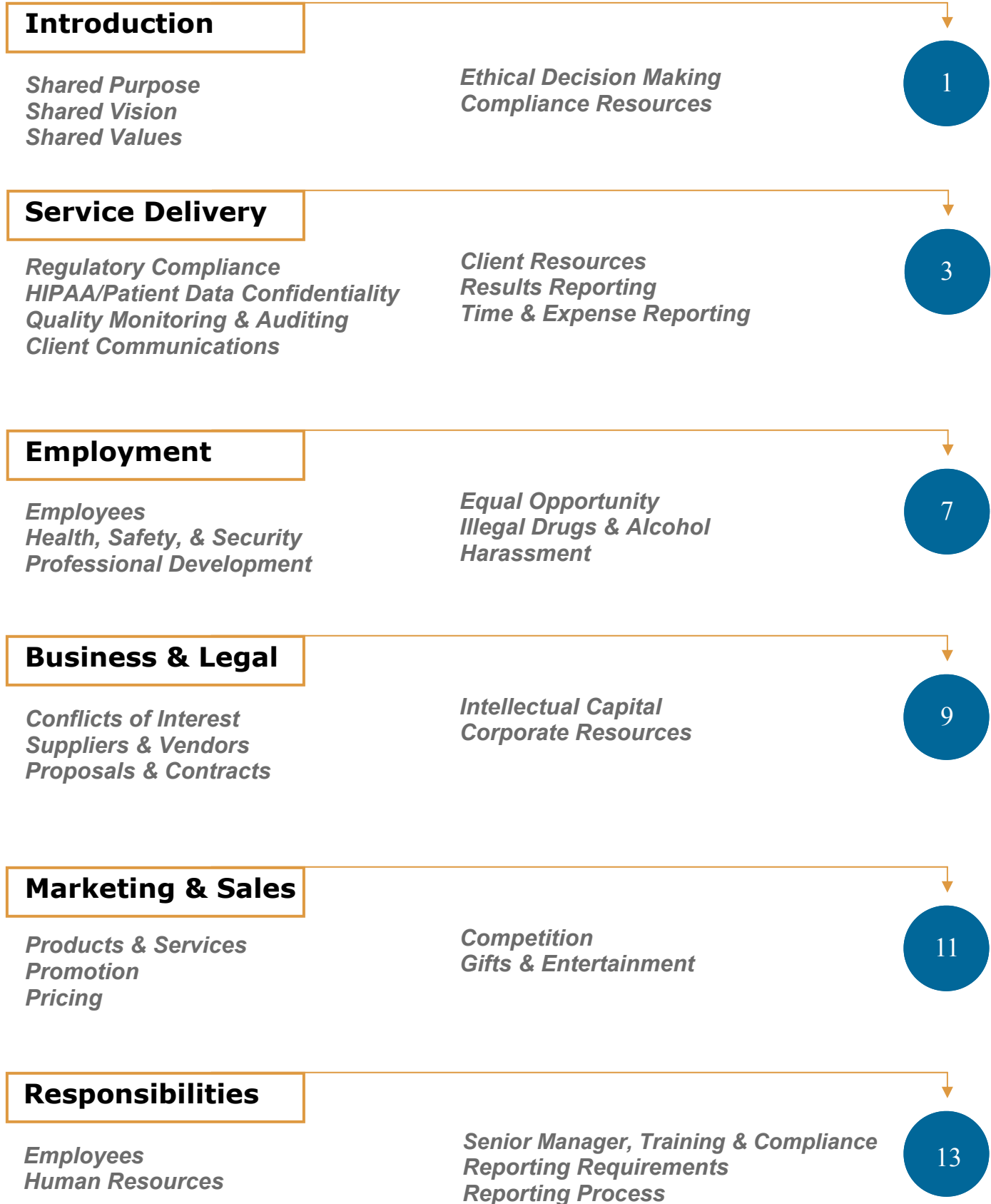
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Standards of Conduct & Individual Integrity



Introduction

Shared Purpose

HP3 will optimize provider effectiveness and efficiency by providing the best health data services in the industry.

Shared Vision

HP3 will be the firm of choice for:

- Management of health information
- Coding and coding education
- Clinical documentation and clinical documentation education
- Quality rating and quality rating education
- Healthcare reimbursement analysis and healthcare reimbursement education

Shared Values



Collaboration—HP3 is committed to collaborating with clients, their medical staff, each other, joint venture partners, and vendors. We focus on teamwork within HP3 and long-term partnership with our clients.



Growth—HP3 is committed to growth, both individually and organizationally. We will grow in size as well as through continuous learning, innovative product development, and by leading the industry in looking at solutions to existing problems in a “different way”.



Commitment—HP3 is committed to delivering the best solutions, to doing what we say we are going to do (integrity), to doing the “right” thing, and to giving back to the patient population in some way. We are committed to individual responsibility and joint accountability and being passionate about what we do.

Ethical Decision Making

HP3's ability to attain the highest level of collaboration, growth, and commitment is predicated on the day-to-day actions and decisions of individual employees. HP3's Standards of Conduct are designed to encourage and maintain a level of behavior and performance that will promote efficiency and conform to accepted ethical and moral principles. While no book of hard and fast rules could hope to cover every situation, HP3 does have specific expectations of its employees, regardless of an employee's job description. Ethics and integrity are always critical in everyday decisions:

- when reporting time worked
- when handling and using confidential patient data
- when using HP3 or client information or resources
- when interacting with customers, suppliers, and competitors
- when preparing project results reports
- when signing off that a task has been completed properly
- when deciding whether to raise an ethical issue

All employees have the responsibility to resolve any doubts or uncertainties relating to ethical questions and compliance situations in the course of their duties at HP3.

Compliance Resources

HP3 encourages all employees to ask questions and to keep asking until satisfied with the answers. Employees should seek advice from any of the following recommended sources:

- Manager (Project or Employee's)
- Compliance Manager
- HP3U e-learning courses
- AHA Coding Clinic, CPT Assistant and Coding Documentation Guidelines
- HP3 policies and procedures
- HP3's Coding & Auditing Compliance Resource Manual

Other resources may be available for unique situations. Remember, keep asking until you get a clear answer to your question. Also remember, the answer you get may not be the one you expected or hoped for. But, you must feel sure that it is consistent with HP3 policy and these Standards of Conduct and Individual Integrity.

Service Delivery



“HP3 employees are expected to follow the appropriate code of ethics that is specific to their credentials or profession.”

Regulatory Compliance

Laws and regulations are ever present in the healthcare industry, affecting virtually every business line and functional area in the company. Regardless of what job an employee is responsible for, there are legal, regulatory, and ethical standards that should be considered and upheld.

HP3 strives to be a good corporate citizen and collaborates with healthcare providers to deliver the best total clinical documentation, coding, and data solutions by complying with all applicable laws and regulations. As individuals, employees must be aware of and understand the Federal and State laws and regulations that impact their jobs. HP3 employees are expected to follow the appropriate code of ethics that is specific to their credentials or profession. Specifically, we must be aware of Medicare and Medicaid billing and documentation requirements when auditing and coding health information for our clients. Although we never submit bills or claims for our clients, we must always comply with official coding and billing regulations.

HP3 employees will:

- prepare reports and studies, offer recommendations and services, in a professional manner abiding with laws and regulations
- maintain high standards of conduct, integrity, and dignity in dealings with the public, clients, potential clients, and fellow employees
- exercise courtesy, tact and respect at all times in dealings with clients, potential clients, vendors, suppliers, and fellow employees
- prohibit the falsification of any information in any report or document

HIPAA/Patient Data Confidentiality

As employees of a healthcare consulting firm, HP3 employees are constantly in possession of sensitive patient data protected under HIPAA, Federal and State laws. This includes patient medical records, patient charts, patient data, and other confidential health information. Indeed, the use and handling of protected health information (PHI) is the cornerstone of our business. As a general rule, HP3 employees should never discuss any details regarding patient information except to authorized individuals on a “need to know” basis.

HP3 employees are held accountable to:

- exercise good judgment and decision-making skills when sharing information with individuals on a project team and outside a project team
- share PHI to those individuals who are authorized to receive the information (including healthcare providers), and who have a direct and valid reason for the receipt of PHI
- protect PHI in accordance with HIPAA regulations
- disclose PHI only when appropriate and in accordance with regulations as permitted under HIPAA and other governing Federal/State laws
- communicate confidential patient information appropriately - a breach of confidentiality is a serious violation and will be dealt with appropriately in accordance with HP3 policies governing such issues
- preserve confidentiality of information acquired during the course of professional activities and refrain from disclosing the information unless otherwise instructed by authorities/law
- safeguard and handle appropriately all confidential information (business and personal)

Service Delivery

(continued)



“Clients rely on our judgment and expertise to assist them with complex health information, operational, financial, and compliance situations.”

Quality Monitoring & Auditing

As a leader in documentation, coding, and data solutions, HP3 realizes the quality of our results and reports is critical to the success of our clients and to our own success. Clients rely on our judgment and expertise to assist them with complex health information, operational, financial, and compliance situations. To help ensure accurate coding, auditing and reporting of key data, all HP3 employees must abide by established quality policies.

Routine quality procedures involve various levels of management or peer review. The specific requirements depend on project requirements, contractual agreements, and Project Manager judgment. Periodic audits to monitor compliance with coding and auditing guidelines will be performed by the Project Manager.

Client Communications

As a leader in clinical documentation, coding, and data solutions, HP3 recognizes that effective and ethical client communications are paramount to achieving our mission of optimizing healthcare provider effectiveness, efficiency, and profitability in the delivery of patient care. HP3 must not make promises that we cannot keep. HP3 employees must collaborate with our clients to achieve schedules that are realistic and meet/exceed client expectations. Communication is critical to our success: clients should be kept advised as to project schedules, problems, and budgets.

Client Resources

HP3 employees are often required to perform their duties at the client's facility. When at a client site, employees should continue to observe HP3 policies and procedures while conforming to the requirements of the location. Generally, employees should not use client's telephone equipment, office supplies, computer equipment, or copying machines for any purpose other than to complete the applicable project task, unless authorized by the client. Employees are entitled to a safe work environment when working either off-site or on-site. If you feel client facilities present a hazard, or if client site requirements contradict HP3 policies, call your manager for guidance.

Results Reporting

Often, the final measure of service is the final report. First and foremost, HP3 employees should be sure that project deliverables meet all contractual requirements. Reports should accurately and completely summarize project activities, observations, problems, and recommendations. Given the regulatory pressures that exist in the healthcare industry today, HP3 must be careful to completely document all observations but only report on what the client requested.

HP3 is frequently asked to work through a client's outside legal counsel to ensure attorney-client privilege. In these cases, all project communications from initial set up through execution, results delivery, and invoicing must be limited to the outside attorney. Communicating directly with the client may void the sought after privilege in the event of an investigation or subpoena.

Time & Expense Reporting

Accurate cost data helps determine how HP3 employees are paid, how clients are billed, how contract costs are allocated, and how new business is priced. This information is essential to any business but is especially critical to consulting practices.

HP3 employees are responsible for ensuring that the information recorded and reported as a part of their job duties is truthful, complete and accurate. This includes time worked, business expenses, productive and performance data, and other business related activities.

HP3 employees will:

- report time worked, expenses, and other business related activities accurately
- report to work on time and in a condition that will permit performance of assigned duties

Employment



“The free exchange of information promotes commitment, growth, performance, teamwork, and innovation.”

Employees

HP3 seeks and values the continuous contributions of all our employees. HP3 maintains the confidentiality of employee records and respects employee privacy. The free exchange of information promotes commitment, growth, performance, teamwork, and innovation. The collaborative environment is fundamental to HP3’s commitment to employees and is supported by communicating fully with employees regarding issues that affect them. In turn, we eagerly welcome and listen to employee ideas and suggestions.

HP3 seeks to provide work that is satisfying and a work environment that is safe, pleasant, and conducive to creativity. The health information field changes rapidly and we encourage all employees to avail themselves of the internal training and educational opportunities. HP3’s training and educational programs are designed to ensure that coding and auditing employees are on the cutting edge of clinical documentation improvement, coding, auditing, compliance, data solutions, and reimbursement issues, while understanding applicable laws and regulations.

Health, Safety & Security

HP3 strives to maintain a healthy, safe, and secure workplace for all HP3 associates. Employees must share the responsibility for a safe, healthy, and secure environment by following accepted safety practices and taking necessary precautions. If a question arises about appropriate safety practices, contact the Human Resources Department for guidance.

Professional Development

HP3 is committed to providing growth opportunities for all employees. Towards this end, we maintain human resource practices to let staff know about current performance status and what job performance is expected. HP3 provides routine performance reviews so that salary and promotion decisions are based on merit. HP3 is also committed to developing employee potential through continuing education and professional organization involvement.

Equal Opportunity

HP3 is fair and equitable in our hiring practices. We seek to create a workforce that is a reasonable reflection of the diverse population in which we operate. HP3 assures employees that the company's policy is to select, place, train and promote the best qualified individuals based upon relevant factors such as work quality, attitude, collaboration, and experience in compliance with applicable local, state and federal laws, and without regard to unrelated work factors such as creed, color, age, national origin, sex, religion, disability, sexual orientation, marital or veteran status, or other characteristics protected by applicable law. Individual integrity and commitment to HP3 means treating others with respect, fairness, and without discrimination. Just as HP3 does not condone discrimination in our hiring practices, we cannot tolerate discriminatory activities on the job. These policies apply for all employment practices including:

- hiring
- training
- compensation
- corrective actions
- promotions
- recruiting
- benefits
- evaluations
- educational assistance
- terminations

A reasonable and prudent background check will be conducted of every new employee. HP3 shall not employ any individual who has been convicted of healthcare fraud or abuse, has been disbarred, or is otherwise ineligible for participation in Federal or State healthcare programs.

Illegal Drugs & Alcohol

HP3 seeks to provide a safe and healthy workplace for all employees. Employees are expected to report to work in a condition to perform assigned duties, free from the influence of drugs or alcohol. Reporting to work under the influence of any illegal drug or alcohol, having an illegal drug in your system, or using, possessing, or selling illegal drugs while on the job or on company property is forbidden and may result in immediate discharge.

Harassment

A workplace free from tensions involving matters that do not relate to business is essential. Workplace harassment is any unwelcome or unwanted attention or discrimination based on ethnic, racial, sexual or religious remarks, animosity, unwelcome sexual advances, or requests for sexual favors. Harassment includes, without limitation, verbal or physical conduct, or visual forms of harassment of a sexual nature.

Everyone has the right to work in an environment free from harassment, intimidation, or hostility. HP3 expects all employees to conduct themselves in an appropriate manner for the workplace. If harassment does occur, employees should report the incident as soon as possible to their manager or the Human Resources Department.

HP3 employees will exercise courtesy, tact and respect at all times in dealings with clients, potential clients, and fellow employees and maintain independence and objectivity in client relations.



“As professionals, our judgment is our most important asset.”

Conflicts of Interest

As professionals, our judgment is our most important asset. Anything that diminishes the credibility of that judgment or erodes trust in the eyes of our colleagues, clients, or managers, especially conflicts of interest, must be avoided.

A conflict of interest exists when a personal interest or activity of an employee influences or interferes with his or her performance of duties, responsibilities, commitments or loyalties to HP3. HP3 employees must avoid any personal or business influences or relationships that affect, or appear to affect, their ability to act in the best interest of the company and the clients. Conflict of interest situations include: consulting with or employment by a competitor, supplier, or customer of HP3; owning a significant interest in a business that does business (or seeks to do business) with HP3; direct supervision of or sole decision making regarding family members or close personal friends as contractors, suppliers, or employees of HP3 by the related individual; using company assets for personal gain.

If you suspect an actual or perceived conflict of interest, consult with your manager to assess whether a problem exists. If a problem does exist, the matter should be referred to the Human Resources Department or the Compliance Manager for interpretation and resolution.

Suppliers & Vendors

HP3 is fair in its choice of suppliers and honest in all business interactions with them. Employees must base purchasing decisions on the basis of objective criteria such as competitive price, quality, quantity, availability, delivery, service and reputation. The ethical and integrity standards and practices of suppliers also influence our purchasing decisions. In procuring supplies and professional contract services, HP3 strives for optimal quality, value, and long-term benefit to the company and our clients.

Our commitment to dealing fairly and honestly with suppliers and vendors means that employees responsible for buying materials or services must not accept or solicit any benefit from a supplier or vendor that might compromise (or appear to compromise) their objective assessment.

HP3 must respect and protect any confidential or proprietary information shared with us by a supplier or contractor. We also should not hesitate to let our suppliers know that we trust them to do likewise.

Proposals & Contracts

HP3 recognizes that the completeness and accuracy of our technical proposals is critical in securing projects and establishing our business integrity and commitment. All proposals should accurately describe our planned project approach including staffing, technical methods, quality checks, and project deliverables. Pricing or performance data in proposals should never be intentionally false or misleading.

Contracts are the cornerstone of successful business relationships. Contracts also offer an effective point of control to ensure fair, reasonable, and ethical dealings with outside vendors, clients, and contractors. All contracts must be:

- approved by a Senior Manager and/or General Counsel
- signed by a Senior Manager or General Counsel
- maintained on file for seven years beyond the contract performance period
- amended only with approval of a Senior Manager and/or General Counsel

Intellectual Capital

Information, knowledge, or know-how gives HP3 a competitive advantage and is treated as intellectual capital. Protection of this intellectual capital plays a vital role in HP3's continued growth. Employees have obligations with respect to proprietary and trade secret information including:

- not to disclose this information outside HP3 except where approved and protected by a written nondisclosure agreement
- not to use this information for individual benefit or for the profit of individuals outside of HP3
- not to disclose this information to other employees except on a "need to know" basis

Intellectual capital is often technical in nature and may include work processes and computer software specifications. However, proprietary information is not always technical and may include: new product plans, objectives and strategies, financial data, sales figures, marketing strategies, pricing, client lists, salary, and human resource data. If an employee leaves HP3, his or her legal obligation to protect all trade-secret and proprietary information is perpetual.

Corporate Resources

Every HP3 employee is obligated to protect company assets. Company property such as office supplies, equipment, and facilities should not be used for personal reasons. Any misuse or misappropriation of company funds, office supplies, computer equipment, telephone equipment, copying machines, computer software, electronic mail systems, or other assets may be considered criminal behavior. Likewise, expenses should not be charged to HP3 unless they are for approved company business. Further, company computers cannot be used with unlicensed or unauthorized software.

HP3 employees will:

- report time worked, expenses, and other business related activities accurately
- utilize company and client assets for business purposes only
- report for work on time, and in a condition that will permit performance of assigned duties

Marketing & Sales



“HP3 aggressively promotes and markets its services and products to identified target markets in a lawful and truthful manner.”

Products & Services

HP3 employees apply their skills and experience in conjunction with advanced technology to optimize healthcare provider effectiveness, efficiency and profitability in the delivery of patient care. HP3 will collaborate with healthcare providers to deliver the best total clinical documentation, coding, and data solutions of the highest quality to our clients.

Knowing what is expected and delivering what was promised are keys to client satisfaction. Towards this end, HP3 services and products must be delivered exactly as specified. To ensure coding and auditing quality, all quality steps and verifications must be followed and recorded. Work papers and records must be accurate.

If an HP3 employee has ideas for improvements, share them! We can each work to make projects more efficient. However, keep in mind existing policies or contractual requirements.

Promotion

HP3 aggressively promotes and markets its services and products to identified target markets in a lawful and truthful manner. While HP3 wants to present our services and products in the best light, employees must be careful to offer a balanced, accurate representation of capabilities, experience, skills, and expected benefits.

Employees responsible for developing, approving, and using functional advertisements and promotional materials are responsible for ensuring marketing accuracy and integrity. Employees must not misstate facts, or create misleading impressions in advertising, literature, or presentations. Omission of important facts may be misleading; the total client perception of the message should be considered.

Employees should understand the company’s full range of services, capabilities and capacities.

Pricing

HP3 bases all pricing for services and products on fair market value, production and labor costs, and research and development costs. HP3 services and software are customized to meet the individual needs of our clients. HP3 prices vary from project to project depending on specific and identified needs.

We strive to provide fair, competitive and complete pricing for all projects and products. Employees responsible for developing price quotes should never intentionally hide costs or expenses that will be later billed to the client. Similarly, our project invoices must be clear, concise and truthful. Billing staff must always be sure to include only agreed upon or contracted costs, along with clear explanations and details of expenses.

It is the position of HP3 that contingency fee engagements create the appearance of impropriety and may lead to abusive reimbursement and billing practices. Therefore, HP3 will charge flat fees and/or hourly rates with respect to client engagements. HP3 does not promise or guarantee a prospective client that its advice or services will produce a specific dollar or percentage increase in the client's Medicare reimbursements.

HP3 employees will:

- not make or imply any promises, assurances or guarantees regarding specific results that are unreasonable or improbable
- not make any statements that misrepresent the services that HP3 is capable of performing, individual qualifications or the qualifications of HP3, or their own academic or professional credentials
- not make illegal or misleading representations regarding HP3's services or products

Competition

Competition is the foundation of a growing and healthy economy. HP3 competes aggressively in an ethical and legitimate manner. HP3 avoids actions which are anticompetitive or otherwise stifle healthy competitive practices.

HP3 employees must never participate in illegal and unethical practices of price-fixing. Neither should employees use improper means of obtaining competitor information to gain an unfair business advantage.

HP3 employees should not discredit the reputation of competitors and their services or products. A fair and factual comparison on objective attributes such as pricing, experience, skills and past performance should be made. HP3 employees should never discuss pricing or other project specifics with competitors, except when dealing with competitors as suppliers, customers, or teaming partners on specific projects.

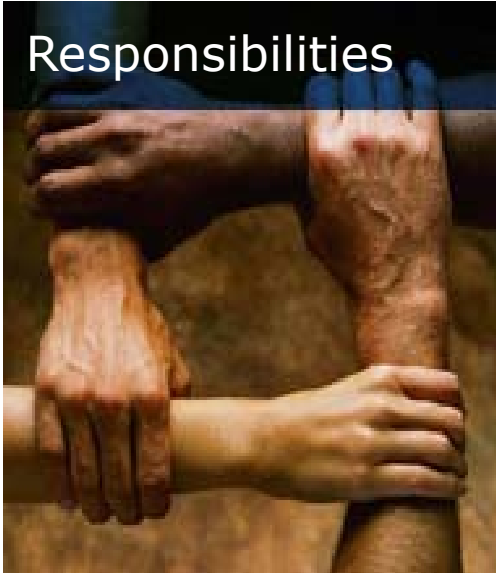
Gifts & Entertainment

In general, the giving or receiving of gifts and gratuities in return for the use or purchase of HP3 services or products is prohibited. However, gifts of nominal value that are part of ordinary business practice from/to any company/individual that HP3 is currently doing business with or seeking to do business with, such as an occasional meal, are usually acceptable. Other examples of nominal gifts include promotional items such as pens, mugs, candy and plants. In unusual circumstances, gifts of more than nominal value may be accepted or given for special reasons. Decisions will be made on a case by case basis with the approval of management.

A useful test to determine a gift's appropriateness is: 1) would the gift cause embarrassment or obligation for the giver or receiver? and 2) would the giving/receiving stand up to public scrutiny? HP3 employees must decide whether the purpose of the gift is to influence or appear to influence business decisions. This consideration is the same for offering a gift to a client and receiving a gift from a supplier.

As a leader in clinical documentation, coding, and data solutions, HP3 often has opportunities to further knowledge of key issues while advancing marketplace knowledge of company services by providing seminar sponsorships, training events, and event speakers. Payment and reimbursement for these activities should be reviewed carefully to ensure they adhere to company policy and guidelines for participating associations.

Responsibilities



“HP3’s employees rely on each other to do what is right.”

Employees

A corporation is built from individual employees. As such, the commitment, conduct, judgment, and decision making of every employee is the largest and most important driving factor that determines HP3’s regulatory compliance, corporate integrity, and business ethics. HP3’s employees rely on each other to do what is right. Day to day we must strive to ensure collaboration and integrity in all our interactions with colleagues, clients, suppliers, and competitors. Likewise, each of us is responsible for reporting any suspected violations of the Standards of Conduct and Individual Integrity.

Human Resources

The HP3 Human Resources Department is available to assist all employees with a wide range of issues and problems. Although employees should first speak with their manager regarding integrity issues, employees can discuss these issues with Human Resources, if necessary. Like managers, Human Resources staff members are responsible for reporting potential violations to the Compliance Manager.

Compliance Manager

The Compliance Manager serves the HP3 employee in several ways. This manager will examine policies and procedures to determine real-world applications. The keystone of the Compliance Managers’ efforts is communication. Through updates, education, and routine communication, the Compliance Manager keeps employees informed regarding what is expected of them. HP3 employees can contact the Compliance Manager confidentially or anonymously to ask questions or voice concerns.

Reporting Requirements

Each HP3 individual employee is the first and best assurance of regulatory compliance, corporate integrity, and business ethics. HP3 employees are the key component in the compliance reporting process. HP3 employees are responsible for their own ethical behavior as well as promptly reporting possible violations. HP3 employees should always seek clarification from the Compliance Manager when uncertain about the legality or noncompliance with applicable laws, regulations, and contractual obligations. HP3 employees can report alleged misconduct verbally or in writing to his or her manager, the Project Manager, a member of Senior Management, the Human Resources Department, or the Compliance Manager. An anonymous report can be filed through the HP3 intranet virtual hotline (<http://intranet> – Corporate Integrity Virtual Hotline), if an employee does not feel comfortable in discussing the allegation. This information will be forwarded to the Compliance Manager for investigation and follow up. Any individual who in good faith raises a question regarding a suspected violation will not be subjected to retaliation of any kind.

HP3 will not commit or condone fraudulent acts. If it is determined that a client has engaged in misconduct, a member of Senior Management will advise the client. After an in-depth review by the Project Manager and HP3 Senior Management, if it is determined that credible evidence of continued misconduct exists, HP3 will refrain from assisting the client with the misconduct and shall terminate the contract.

Reporting Process

