



Policy Section:	HUMAN RESOURCES
Policy Name:	CODE OF CONDUCT
Policy Number:	3.12
Procedure:	Code of Conduct
Procedure Number:	3.12.01
Original Effective Date:	7/13/2011

CODE OF CONDUCT

Purpose

This procedure establishes the code of conduct expected of all LifePath Systems workforce members. In addition to the LifePath Systems’ Code of Conduct, members of the workforce are subject to general standards of conduct for healthcare organizations and are expected to comply with professional standards of conduct or ethical requirements applicable to their discipline.

Procedure

In striving to fulfill our vision and carry out our mission, all members of the LifePath Systems workforce must meet public expectations for excellence by providing high quality healthcare and related services, demonstrating sound stewardship of resources, acting with integrity, and displaying fair treatment and respect for all. Those acting on behalf of LifePath Systems have a general duty to conduct themselves with honesty and trustworthiness, with efficiency and effectiveness, and to demonstrate accountability and compliance with federal, state, and local laws and regulations, and LifePath Systems policies and procedures.

Attached to this document is the current version of the LifePath Systems’ Code of Conduct and the workforce members’ Confidentiality Acknowledgment. Members of the workforce are required to acknowledge receipt, understanding, and agreement to these documents prior to performing work on behalf of LifePath Systems. In addition, each member of the workforce will be enrolled in an annual review of these documents through the LifePath Systems’ online learning system. Failure to comply with the requirements of the Code of Conduct and Confidentiality Acknowledgment will result in discipline outlined in procedure 3.01.19 *Progressive Discipline*.

Exhibits/Forms

Attachment A – LifePath Systems Code of Conduct- August 2023 v6.0(e).

Attachment B – Confidentiality Acknowledgment - August 2023 v6.0(e).

Related Policies	Related Procedures
	3.01.19 Progressive Discipline
	3.12.02 Conflict of Interest

Other Supporting Information

Health & Safety Code 534.0065 Qualifications, Conflict of Interest, Removal

22 Texas Administrative Code Chapter 681 Rules Relating to the Licensing and Regulation of Professional Counselors

25 Texas Administrative Code §140.423 Professional and Ethical Standards for All License Holders

25 Texas Administrative Code §681.41 General Ethical Requirement (Professional Counselors)

Dates Reviewed: July 2016; May 2020; August 2021; May 2022; August 2023

APPROVED: _____
Chief Executive Officer Signature and Date

CODE OF CONDUCT

Introduction

LifePath Systems (the Center) is committed to conduct that adheres to the highest ethical standards. Common sense, good business judgment, ethical personal behavior, as well as compliance with applicable laws, policies and procedures are what the Center expects from all members of the LifePath Systems workforce including our employees, volunteers, clinicians, vendors, contractors, and others affiliated with or doing business on behalf of LifePath Systems, whether paid or unpaid.

The LifePath Systems Code of Conduct details the fundamental principles, values, and framework for action within LifePath Systems. It is intended to complement the Center’s Mission Statement, and Values and promote:

- Honest and ethical conduct;
- Compliance with all applicable federal, state, local laws, and regulations; and,
- Prompt internal reporting of violations and compliance concerns.

The Code of Conduct applies to all workforce members of the Center whether on and off-Center premises, at any time regardless of a workforce member’s work schedule, and via any medium, including social media, such as (but not limited to) Facebook, YouTube, LinkedIn, Tik Tok, and Twitter. The Code of Conduct provides general guidance on acceptable behavior and is not intended to fully describe the laws and regulations that apply to workforce members or to detail LifePath Systems policies and procedures. Workforce members are expected to be aware of and gain a general understanding of key laws, regulations, policies, and procedures relevant to their assigned duties.

Our Service Delivery

LifePath Systems is committed to providing high-quality services in the communities served. All services shall be¹:

- Delivered on the basis of individual need and without regard to race, creed, color, national origin, age, sex, sexual orientation, gender identity, physical handicap, or ability to pay.
- Delivered to each individual in accordance with an individualized, person-centered service plan using approved trauma-informed principles that are culturally and linguistically appropriate.
- Monitored and evaluated to assure that services are delivered according to established standards, in an efficient manner, with measurable outcomes.

Workforce members are expected to treat those who receive services with respect and dignity, providing quality, compassionate care in a clean, safe environment.

- Workforce members are prohibited from entering into any personal, financial, or employment relationship with an individual receiving services or their family members (including but not limited to providing childcare services, in-home or out-of-home respite, and the selling, purchasing, lending, or borrowing of money or property.)
- Workforce members are prohibited from communicating with any individuals or their families through any social media platform including but not limited to Facebook, Twitter, SnapChat, Instagram, etc.

¹ See LifePath Systems Policy #6.01 Service Delivery



- Workforce members are prohibited from engaging in any dating or sexual relationship with individuals actively enrolled in services.
- Workforce members are prohibited from accepting personal gifts from individuals receiving services, vendors, and other parties with an established, or seeking to establish, a business relationship with the Center.
- Workforce members are not allowed to load personal software on their Center-owned device. All software must be either installed by the MIS Department or by someone contracted by the MIS Department. Individual users are not authorized to install any software on Center-owned PCs².
- Workforce members are prohibited from using their personal devices to conduct Center business.

Professional Representation

Workforce members will demonstrate relevant competencies to include, critical, specialty, and crisis competencies, prior to assuming duties and having contact with individuals served or contact with confidential information and protected health information (PHI).

LifePath Systems workforce members will represent their qualifications, credentials, criminal history, and professional experience honestly and accurately on their application, resume, during an interview, and during the course of their employment/affiliation with the Center.

Licensed professionals are expected to have and maintain all required licenses³, and adhere to the ethical and professional standards dictated by their respective professional organizations and licensing boards. LifePath System will report violations of professional ethics to the relevant Board or Commission of that discipline.

Workforce members will inform individuals receiving services of the anticipated benefits and potential risks of treatment, the scope of services being provided, and the qualifications/titles of all applicable service providers.

Workforce members will represent themselves accurately when using Center information systems and external systems by only using their unique designated login information. Sharing of login information is strictly prohibited and may result in immediate termination⁴.

Policies and Procedures

LifePath Systems policies and procedures eBook includes all policies approved by the Board of Trustees and procedures approved by the Chief Executive Officer. Workforce members are expected to regularly access the LifePath Systems Policies and Procedures (P&P) eBook and understand that it is their responsibility to comply with ALL published guidance. It is the responsibility of the division directors, program administrators, and supervisors to review all policy and procedure changes with their direct

² See LifePath Systems' procedure #8.02.06 MIS User Procedures

³ See LifePath Systems' procedure #3.04.04 Credentialing & Recredentialing

⁴ See LifePath Systems' procedure #8.02.02 Technology Security



reports to address all areas specific to their program area, and ensure appropriate training and education is provided to all applicable workforce members.

Leadership Responsibilities

Effective leadership is the ability of a leader to execute strategic business goals while creating a work culture that allows workforce members to contribute meaningfully to the achievement of those goals. It is the expectation that LifePath Systems leaders promote the highest standards of conduct through continued compliance with applicable ethical guidelines and standards. Leaders are expected to show impartial, fair treatment to all workforce members. LifePath Systems leaders must never sacrifice ethical and compliant behavior in the pursuit of business objectives.

Compliance

LifePath Systems is committed to maintaining a culture of compliance and quality. In striving to fulfill our vision and carry out our mission, all members of the LifePath Systems workforce must meet public expectations for excellence by providing high quality healthcare and related services, demonstrating sound stewardship of resources, acting with integrity, and displaying fair treatment and respect for all. Those acting on behalf of LifePath Systems have a general duty to demonstrate accountability and compliance with all applicable policies and procedures, federal, state, and local laws, and regulations.

LifePath Systems workforce members are expected to be sensitive to legal and ethical issues, have an ongoing awareness of key compliance issues, be aware of how to access the LifePath Systems' Policy and Procedure eBook and understand their responsibility to report fraud, waste, or abuse to LifePath Systems management.

Responsibility to Report

LifePath Systems workforce members are required to report any information regarding a known or suspected violation of any applicable laws, regulations, ethical standards, Code of Conduct violations or LifePath Systems policies or procedures as soon as they become aware of such. If a member of the workforce has difficulty interpreting a policy or procedure, they should consult with their supervisor to determine whether consultation with the Director of Human Resources or the Compliance Officer is appropriate⁵.

⁶Workforce members are required to self-report any conviction, incarceration, criminal fine, probation, community service, or deferred adjudication occurring after the last performed background check.

LifePath Systems does not do business with, hire, or bill for services rendered by excluded or debarred individuals or entities. ⁷Workforce members are required to report to their supervisor, or the Human Resources Department immediately if the workforce member becomes excluded, debarred, or ineligible to participate in any government health care program or becomes aware that anyone doing business with or providing services for or on behalf of LifePath Systems has become excluded, debarred, or ineligible. Supervisors are required to report knowledge of a workforce member becoming excluded, debarred, or ineligible for participation in a governmental healthcare program immediately to the Human Resources Department.

⁵ See LifePath Systems' Compliance Program (accessible on the LifePath System's website)

⁶ See LifePath System's Procedure #3.01.03 Basic Criteria for Employment

⁷ *ibid*



Workforce members are required to immediately report cases of alleged abuse, neglect, and exploitation of individuals receiving services to the appropriate authorities, including the Department of Family Protective Services, law enforcement and regulatory agencies. LifePath Systems requires its workforce members to make reports of possible abuse, neglect, and exploitation immediately upon discovery (within one hour of awareness) and shall be subject to disciplinary action and possible criminal prosecution if this requirement is not met⁸.

Workforce members are required to report unusual incidents immediately upon discovery via LifePath Systems Compliance Management Software System (Healthicity).

Any violation of LifePath Systems' Code of Conduct, policies, procedures, or applicable laws and/or regulations will be handled through approved disciplinary processes, and may lead to serious disciplinary action, up to and including immediate termination.

Laws and Regulations

LifePath Systems workforce members are expected to perform their duties in good faith to the best of their ability and not engage in any illegal, unfair, or deceptive conduct relating to business practices. LifePath Systems expects its workforce members to fully comply with all applicable laws and regulations including federal, state, and local.

Failure to comply with legal requirements can lead to serious disciplinary action, up to and including immediate termination. Key health care compliance laws which are also addressed in the LifePath Systems Biennial Compliance Program include (but are not limited to):

- Title XVIII of the Social Security Act.
- Title XIX of the Social Security Act - Medicaid
- The physician self-referral law, known as the Stark law, which prohibits health care entities from submitting any claim for certain services, also referred to as designated health services, if the referral comes from a physician with whom the health care entity has a prohibited financial relationship.
- The federal anti-kickback statute and similar Texas statutes, which prohibit payments (direct or indirect), made to induce, or reward the referral or generation of government health care program business.
- The Emergency Medical Treatment and Labor Act (EMTALA), which contains requirements for the evaluation and treatment of individuals experiencing a health-related emergency.
- Laws authorizing the U.S. Department of Health and Human Services (HHS), Office of Inspector General (OIG), to exclude health care providers from participation in federal health care programs that provide unnecessary or substandard items or services provided to any individual receiving services.
- Privacy and security laws and regulations that protect client information, including protected health information (PHI) under the Health Insurance Portability and Accountability Act of 1996

⁸ See LifePath System's Abuse, Neglect & Exploitation procedure.



(HIPAA), the Health Information Technology for Economic and Clinical Health (HITECH) Act of 2009, the Final Omnibus Rule, and the Texas Medical Records Privacy Act as amended by Texas H.B.300.

- Federal and Texas false claims statutes and whistleblower protections that serve a key role in preventing and detecting fraud, waste, and abuse in government funded health care programs.

Fraud and Abuse, the False Claims Act and Whistleblower Protections⁹

- **Health Care Fraud** is a deliberate deception or misrepresentation of services that results in an unauthorized reimbursement.
- **Health Care Abuse** refers to practices that are inconsistent with accepted medical, business, or fiscal practices.

LifePath Systems will fully comply with the federal False Claims Act (FCA) and the Texas Medicaid Fraud Prevention Act (TMFPA) (also referred to as the Texas False Claim Act) that fight fraud and abuse in government health care programs. Under both the FCA and similar Texas laws, there are protections against retaliation for filing a report in good faith. The FCA creates liability for any person who knowingly:

- Presents a false or fraudulent claim to the U.S. Government for payment or approval, which includes submission to Medicaid and Medicare.
- Uses false records or statements material to a false or fraudulent claim.
- Conceals or knowingly and improperly avoids or decreases an obligation to pay or transmit money or property to the government (Reverse False Claim).

The FCA contains a *qui tam* or whistleblower provision, which permits a private person with knowledge and evidence of a claim filed fraudulently with the intent to obtain reimbursement by a government agency, to file a lawsuit on behalf of the U.S. government.

Relationships with Federal Health Care Beneficiaries

Workforce members will comply with Federal fraud and abuse laws which prohibit offering or providing incentives to beneficiaries in government health care programs and authorize the Office of Inspector General (OIG) to impose civil money penalties (CMPs) for these violations.

Government health care programs include Medicare, Medicaid, Veterans Administration, and other programs.

Workforce members may not offer valuable items or services to the employees or representatives of these programs to attract their business (including gifts, gratuities, certain cost-sharing waivers, and other things of value).

Coding and Billing Integrity

All billing practices, including the preparation and filing of cost reports, must comply with federal and Texas laws and regulations as well as LifePath Systems Policies and Procedures.

LifePath Systems management will assist applicable workforce members in identifying and appropriately

⁹ Texas Office of the Attorney General (OAG) – Healthcare Fraud and Abuse

<https://www.texasattorneygeneral.gov/consumer-protection/health-care/health-care-fraud-and-abuse>



resolving any coding or billing issues or concerns. LifePath Systems will refund overpayments made by a federal health care program or other payers in accordance with applicable law.

Workforce members will document accurately in all client records, timesheets, financial transactions, billing, and report generation.

Confidentiality

LifePath Systems has a legal and ethical responsibility to safeguard the privacy of individuals who receive our services, and to protect the confidentiality and security of all protected health information (PHI), as defined under the Health Insurance Portability and Accountability Act of 1996 (HIPAA), and sensitive personal information as defined by the state of Texas.

All workforce members will adhere to LifePath Systems Policies and Procedures on confidentiality and related State and Federal laws and regulations that protect client information, including protected health information (PHI):

- Health Insurance Portability and Accountability Act of 1996 (HIPAA)
- Health Information Technology for Economic and Clinical Health (HITECH) act of 2009
- Texas Medical Records Privacy Act as amended by Texas H.B. 300, which went into effect September 2012.

Workforce members will always show respect for each individual's privacy by monitoring office, lobby, and hallway conversations of themselves and others.

Workforce members will not acknowledge individuals in public places unless the individual initiates contact.

- Should such contact be initiated, workforce members are instructed to not discuss any matters that involve the sharing of PHI in any public/unsecured settings.

Workforce members with access to sensitive personal information (SPI) including personnel records, workforce payroll, or other related personnel information shall not share information or use such information in any manner other than stated in their job description.

Workforce members will not access PHI or SPI outside the scope of their role/responsibility.

Medical Records

LifePath Systems strives to ensure medical records are accurate and to provide information that documents the treatment provided and supports claims submitted. Tampering with or falsifying medical records, financial documents or other business records of LifePath Systems will not be tolerated.

The confidentiality of protected health information must be maintained in accordance with privacy and security laws and regulations, including protected health information (PHI) under the Health Information Portability and Accountability (HIPAA) Act, the Health Information Technology for Economic and Clinical Health (HITECH) Act, and applicable Texas law.

Conflict of Interest

LifePath Systems' workforce members and affiliate providers are expected to avoid conflicts of interest which may impede their best judgment.



- Workforce members may not use their position to influence decisions that result or appear to result in financial, personal, organizational, or professional gain for themselves or anyone with whom they have family, business, or other ties.

It is the workforce member's responsibility to disclose a potential conflict in accordance with the process outlined in LifePath Systems' Conflict of Interest procedure (#3.12.02) within 30 days of discovery. Failure to properly disclose a real or perceived conflict of interest may result in disciplinary action up to and including termination of employment.

Monitoring and Investigations

LifePath Systems is committed to monitoring and investigating compliance concerns relating to laws, regulations and/or LifePath Systems Policies and Procedures. When a violation is substantiated, LifePath Systems will initiate corrective action including, as appropriate, resolving overpayments, making required notifications to government agencies, implementing systemic changes to prevent recurrences, and instituting disciplinary action.

An employee may be placed on an administrative leave status, with or without notice, to permit an active review/investigation of various circumstances including allegations of dishonesty, theft or misappropriation of company funds or property, violence on the job, gross safety, negligence or acts endangering others, insubordination or any other conduct that warrants removing the employee from the worksite.

Workforce members are expected to cooperate with investigations by providing truthful accounts and relevant documentation in response to investigator questions and related information requests. Workforce members who fail to cooperate, or otherwise impede an investigation may be subject to disciplinary action in accordance with LifePath Systems' Progressive Discipline procedure #3.01.19.

Workplace Health and Safety

LifePath Systems is committed to providing a safe and healthy workplace for all workforce members by establishing and maintaining an effective health and safety program.

Key elements of LifePath Systems Health & Safety Protocols include but are not limited to:

- Emergency Response Plan (procedure # 6.04.01)
- Infection Control Plan and Manual (procedure 5.01.18)
- Environmental Safety Surveys (procedure #10.01.03)
- Security Badges Protocol (procedure # 3.01.15)
- Incident and Complaint Reporting System
- Use of Center Vehicles & Driver Responsibilities (procedure #2.02.05)

All workforce members are required to:

- comply with the training requirements regarding safety issues;
- follow the procedures outlined in the various safety-related plans; and
- report any unsafe or questionable practices or circumstances.

Employment

LifePath Systems promotes diversity and strives to provide a workplace environment that is in full compliance with all applicable employment-related laws as well as LifePath Systems Policies and Procedures.



It is LifePath Systems policy to provide equal employment opportunities to all personnel, prospective and current, without regard to race, color, religion, sex, age, sexual orientation, national origin, marital status, disability, or veteran status, and LifePath Systems will do its best to make reasonable accommodations for known disabilities.

LifePath Systems personnel who have questions concerning or are aware of any breach of the Equal Employment Opportunity (EEO) guidelines, should contact the LifePath Systems Human Resources Department. LifePath Systems prohibits workplace violence, threats of harm and harassment of its personnel of any kind.

Relationships with Colleagues

LifePath Systems' workforce members will show respect to colleagues at all times.

Workforce members will avoid negative comments or criticism of colleagues in communications with individuals or other workforce members. Workforce members will handle disagreements with other workforce members professionally and privately. If the matter cannot be resolved between colleagues, workforce members should refer the problem to their immediate supervisor.

Workforce members will not solicit individual colleagues to sell products, collect donations, either during or after work hours. There will be a designated location at each site where these requests can be posted ("News" on bulletin boards).

Workforce members who are related to (through marriage or blood) or dating another staff member may not supervise that person, approve their timesheets, or expense reports, write expense reimbursement checks, sign status change requests, or authorize any changes in their employment status or job responsibilities.

Should a situation arise where two employees in the same unit begin dating and one is in a supervisory position, one of the two must request transfer to another department immediately.

Workforce members are prohibited from using social media (Facebook, Twitter) to discuss any other member, personal issues, or disagreements with LifePath Systems or any of its workforce members.

Reporting Suspected Wrongdoing

Members of the LifePath Systems workforce have a responsibility to report knowledge of, or in good faith, suspicion of any wrongdoings promptly, using one of the processes described below.

In most cases, concerns should be brought to the attention of the immediate supervisor first. If this does not result in appropriate action, or if the workforce member is uncomfortable discussing these issues with their supervisor, the workforce member shall:

- Report to a Program Administrator/Manager/Supervisor, Division Director, Director of Human Resources, or to the Compliance & Quality Assurance Department.

- Submit a verbal report through the LifePath Systems Compliance Hotline (972.330.4301) or via Healthicity — these reports may be made anonymously. Workforce members who report an ethics violation in good faith will not be subject to disciplinary action or punished in any way for making a report.



- Members of the LifePath Systems Workforce who are not employees may contact their LifePath Systems supervisor, LifePath Systems contract manager (if applicable), or the LifePath Systems Compliance and Quality Assurance Department.

Any workforce member who becomes aware of improper conduct but knowingly declines to report the improper conduct may be subject to disciplinary action up to and including immediate termination.

Self-reporting is encouraged — anyone who reports their own wrongdoing or violation of law will be given due consideration in potential mitigation of any disciplinary action.

Retaliation in any form against anyone who makes a good faith report of actual or suspected wrongdoing or cooperates in an investigation is strictly prohibited. Suspicions of retaliation shall be reported immediately, using any of the methods described above.

CONFIDENTIALITY ACKNOWLEDGMENT

I understand that LifePath Systems has a legal and ethical responsibility to safeguard the privacy of individuals who receive our services and to protect the confidentiality and security of all protected health information (PHI), as defined under the Health Insurance Portability and Accountability Act of 1996 (HIPAA), and sensitive personal information (SPI) as defined by the state of Texas.

During my employment or affiliation with LifePath Systems, I may hear or read information related to an individual’s health or see electronic or paper files containing confidential PHI or SPI even if I am not directly involved in providing services to that individual. I may also create documents containing confidential information, as part of my job and/or as directed by my supervisor or contract manager.

As part of my employment or affiliation with LifePath Systems, I agree to the following:

- **Confidential Health Information.** I will regard confidentiality of health information and other sensitive personal information as an essential obligation on behalf of individuals who receive our services. I understand that all information, which in any way may identify someone who is seeking or receiving services, or which relates to an individual’s health or sensitive personal information, must be maintained in strict confidence. Except as permitted by this Confidentiality Acknowledgment (the Acknowledgement), I will not at any time during or after my employment or affiliation speak about or share any information with any person or permit any person to examine or make copies of any reports or other documents that I come into contact with or which I create that identify an individual who is receiving services or disclose PHI or SPI, except as allowed within my job duties or by consent and authorization from the individual receiving services.
- **Permitted Use of Confidential Information.** I understand that I may use and disclose PHI to other providers of health care services only if the purpose of the disclosure is for treatment, consultation, or referral of individual’s receiving our services. If my job description allows, I may also disclose information for payment and billing purposes and/or internal operations, such as use for internal quality reviews and for internal education activities.
- **Prohibited Use and Disclosure.** I understand that I must not access, use, or disclose any records to outside parties except with the written consent and authorization of the individual receiving services, or their legally authorized representative. I must neither physically remove records containing confidential information from LifePath Systems premises, nor alter or destroy such records. I also agree to immediately report to my supervisor or to the LifePath Systems Chief Compliance Officer any non-permitted disclosure of confidential information relating to an individual receiving services that I make by accident or in error, or that I see others making that may be a wrongful disclosure. I understand there are special protections applied to mental health records, records of drug and alcohol treatment, and HIV related information. I understand these protections apply to unauthorized use or disclosure in any format, oral/verbal, fax, email, written, electronic, or digital.
- **Electronic Device Security.** I will only use LifePath Systems approved devices. If necessary to have any identifiable PHI on a device, I agree to encrypt, and password protect information. I agree to use LifePath Systems approved secure e-mail when sending PHI outside the LifePath Systems domain. I will not attempt to access information by using a user identification code or



password other than my own, nor will I release my user identification code or password code to anyone or allow anyone to access or alter information under my identity. I will back-up any confidential information using approved back-up procedures.

- **Social Media Use.** I agree that I will never post or transmit or confirm or deny information that could be used to identify an individual receiving services, or their family members in social media without written consent from the individual receiving services and my supervisor or contract manager.
- **Physical Security.** I will take all reasonable precautions to safeguard confidential information. These precautions include using locking file cabinets, locking office doors, securing data tapes, CDs, USB drives and other electronic media; and use only media approved for use by the LifePath Systems MIS department. I agree to store my electronic media on approved LifePath Systems servers and store back-up media in approved locations.
- **Privacy and Security of Information while Traveling or off LifePath Systems Property.** If my employment or affiliation with LifePath Systems requires that I take PHI off LifePath Systems property, I will ensure that I have LifePath Systems' permission to do so. I will protect PHI from unauthorized disclosure to others.
- **Return or Destruction of Information.** I will ensure that all confidential information is returned to the appropriate location. Unless specifically stated in my job description or professional services contract, I am not authorized to destroy any original confidential information maintained in any medium, i.e., paper, electronic, etc.
- **Termination.** When I leave my employment or affiliation with LifePath Systems, I will ensure that I take no identifiable PHI with me, and I will return all PHI regardless of format to LifePath Systems.
- **Disclosures Required by Law.** I understand that I am required by law to report suspected child or elder abuse to the appropriate authority. I agree to cooperate with any investigation facilitated by LifePath Systems, the Department of Health and Human Services or any oversight agency. I agree to provide truthful accounts and relevant documentation in response to investigator questions and related information requests. I understand that workforce members who fail to cooperate, or otherwise impede an investigation may be subject to disciplinary action in accordance with LifePath Systems' Progressive Discipline procedure #3.01.19.

Violations. I understand that violation of this Acknowledgment or the LifePath Systems policies and procedures that address confidentiality may result in corrective action, up to and including immediate termination of my employment or affiliation. In addition, violation of privacy or security regulations could result in criminal or civil charges by state or federal authorities against me with the potential for fines or prison.