



## Compliance and Ethics Requirements for Compassion in Action - USA

Compassion in Action – USA is committed to providing personal advocacy services without cost to our community members who are struggling with a health-related crisis. We will provide assistance to each person until they have received the medical services they are eligible for so that they may live in dignity. An essential aspect of our mission is to provide services in a way that protects each person’s ethical and legal rights. The following statement outlines the CODE of CONDUCT expected of each member or volunteer in Compassion in Action – USA. At the end of the statement, you will be asked to indicate your acceptance of this code as a representative of Compassion in Action – USA.

### CODE OF CONDUCT

As a representative of Compassion in Action – USA, you will have the opportunity to meet and share personal information among community members and their families, government offices, nonprofit organizations, and other representatives of Compassion in Action – USA. This information must be protected whether or not you are conducting official activities of Compassion in Action – USA. They apply everywhere at all times. The standards of compliance and ethics detailed below provide a level of protection similar to a hospital setting like UCLA. Compassion in Action – USA acknowledges UCLA’s Office of the Provost, Medical Sciences, for general guidance on the details contained in this statement. Areas that have been identified as important compliance areas by the Federal Government were also a consideration in the preparation of this statement.

All representatives of Compassion in Action – USA are dedicated to building and sustaining an ethical environment founded on basic values. Each representative of Compassion in Action - USA has the responsibility to carry out their duties in a manner consistent with our values. Some of our values are:

- **Respect** - We treat all individuals with respect and courtesy.
- **Honesty** – We are truthful in how we represent our capabilities and ourselves.
- **Integrity** – We make decisions and take action based only on the best interest of our clients and of the organization.
- **Compassion** – We are committed to providing compassionate assistance.
- **Fairness** – We provide a consistent standard of assistance to all of our clients.
- **Innovation** – We support innovation by advancing our organization through research and education to improve client services.
- **Stewardship** – We seek to use all our resources effectively and efficiently.

Fulfillment of our mission depends upon the commitment of representative of Compassion in Action – USA to:

1. know and comply with the CODE of CONDUCT
2. Avoid involvement in illegal, unethical or otherwise improper acts
3. Seek guidance from a responsible individual when confused or in doubt about his or her responsibilities
4. Assist representatives of Compassion in Action \_ USA and authorized outside personnel in investigating all allegations of violations
5. Take responsibility for his or her actions



**QUALITY OF SERVICES**

*Compassion in Action – USA will provide quality assistance that is appropriate, medically necessary, and efficient to the extent possible.*

- All clients will be afforded consistent assistance.
- To the extent possible, Compassion in Action - USA will involve, where appropriate, patients and family members in decisions regarding the requested assistance.
- Compassion in Action – USA recognizes the right of clients to make choices about assistance, including the right to forego assistance.
- To insure the integrity of decision-making, assistance decisions are based on identified client health care needs.

**PRIVATE AND CONFIDENTIAL INFORMATION**

*All efforts will be made to protect private and confidential information concerning the clients and activities of Compassion in Action - USA.*

- Representatives of Compassion in Action - USA shall not reveal or disclose confidential client information to unauthorized persons including, but not limited to, family, friends, relatives, associates, suppliers, vendors, customers, and competitors. If an employee is uncertain as to whether the individual or entity is an authorized source or whether the information must be released under the California Public Records Act, Information Practices Act, or other statutes requiring the release of information, the employee should review the request with a member of the Board of Directors.
- Confidential patient information should be discussed with or disclosed to representatives of Compassion in Action – USA on a limited, “need to know only” basis and others only in response to a legal or authorized request. At no time should confidential patient information be discussed with or disclosed to non-representatives of Compassion in Action – USA, except in the form of a client testimonial that has been prepared by or with the permission of the client.
- In accordance with hospital medical records policies, clients are entitled to receive copies or summaries of their records with the exception of minors.

**CREATION AND RETENTION OF CLIENT RECORDS**

*All client records are the property of Compassion in Action – USA. Representatives responsible for the preparation and retention of records shall ensure that those records are accurately prepared and maintained in the following manner:*

- The records shall not contain any false, fraudulent, fictitious, deceptive or misleading information.
- Representatives of Compassion in Action – USA shall not destroy, alter or after the fact or remove any client records.
- Compassion in Action – USA follows record retention and record destruction policies and procedures consistent with Federal and state requirements regarding the appropriate time periods for maintenance and location of records. The premature destruction of records could be misinterpreted as an effort to destroy evidence or hide information.
- Under no circumstances, should representatives of Compassion in Action - USA sign someone else’s signature or initials on client records.



- It is unlawful to knowingly make false entries in client records. Records can be amended and material added to ensure the accuracy of a record. However, the record must indicate that the notation is an addition or correction and record the actual date that the additional entry has been made.

**GOVERNMENT REQUESTS FOR INFORMATION**

*Representatives of Compassion in Action - USA should cooperate with a government investigation and not make false or misleading statements to a government investigator.*

- If an investigator wants to talk to a representative of Compassion in Action – USA, the representative must obtain positive identification of the investigator and identify the subject of the request and information requested before consenting to interviews or providing information.
- Before answering any questions, representatives of Compassion in Action - USA have the legal right to consult with a member of the Board of Directors or legal counsel. Consulting with legal counsel does not mean that the representative is unwilling to cooperate with the government.
- It may be difficult to determine what legally can or cannot be released. Prior to providing an investigator with confidential client information, either in written or verbal form, consult with a member of the Board of Directors. Compassion in Action - USA has a responsibility to protect client confidentiality.
- Representatives of Compassion in Action - USA must not attempt to persuade other representatives to lie or make misleading statements to a government investigator or to alter or destroy records.



COMPASSION IN ACTION – USA

**ACKNOWLEDGMENT OF  
CODE of CONDUCT**

Although the standards included in the Code are intended to communicate policies that are comprehensive and easily understood, we realize that by their nature, some of these topics are complex. Thus, we encourage all representatives of Compassion in Action – USA to consult with a member of the Board of Directors should they have any questions regarding any of the standards and/or their responsibilities as a representative.

My signature on this form acknowledges that I have received from Compassion in Action - USA and agree to the conditions outlined in this statement of the CODE of CONDUCT.

\_\_\_\_\_  
Name (Please Print)

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Board of Directors Witness