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To: Joint Conference Committee (JCC) Members

From: Sunny T. Cooper, Senior Director of Compliance and Regulatory Affairs (Interim)
Compliance Department

Date: December 19, 2025

Subject: Code of Conduct

Approval of Code of Conduct November 2025 Release

CCHP has updated its Code of Conduct to remove reference to specific processes and focus more on ethical conduct and behavioral standards. Below is a detailed summary of changes.

- ***NEW*** - disclaimer that the Code of Conduct shall not be construed as a contract of employment and who it applies to.
- ***NEW*** - Table of Contents
- ***NEW*** Section Introduction and Purpose - Definition of Ethics and what it is, Questions to ask yourself when faced with a challenging situation
- ***NEW*** Section on Business Practices – expanded Conflicts of Interest, gifts and Tips, FWA, description of applicable laws (false claims act, stark law, anti-kickback law, etc)
- ***NEW*** Section on Privacy, Security, and Protection of Assets – Information Security and Data Protection, Responsible use of AI
- ***NEW*** Section on Public Engagement – Media and Speaking Engagements, Reference to Social Media Policy, Political Activity
- ***NEW*** Section on Workplace Environment – Drug and smoke-free workplace, emergency plan, no discrimination, bullying, harassment, or violence, no solicitation

| Section in Current Code | Current |
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| Mission and Principles | RETAINED as written. |
| Commitment to members, payors and regulators, Patient/client/member care and rights | MOVED AND UPDATED section to “professional interactions” - Streamlined language to highlight that everyone should be treated with respect and dignity |

| Section in Current Code | Current |
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| Confidentiality of patient information, HIPAA | MOVED AND UPDATED to section on “privacy, security and protection of assets” |
| Contract Physicians | REMOVED section of payments for referrals and the process for contracting physicians |
| Agreements with other health care provider and management/marketing companies | REMOVED additional notes on referrals and requirements of contracts |
| Accrediting bodies | REMOVED section on treating accrediting bodies in an honest manner (included in business practices) |
| Contracting and bidding process | REMOVED section on process |
| Marketing Practices | REMOVED section that marketing should be truthful and honest (included in business practices) |
| Antitrust | REMOVED statement on anti-trust |
| Waivers of copayments and deductibles | REMOVED language that waivers are “not routine” |
| Coding and third-party billing | REMOVED statement that all coding and billing should be accurate (section included in protection of assets) |
| Cost reports | REMOVED requirement that cost reports are submitted according to law |
| Third-party payers | MOVED AND UPDATED language that says oversight is done (included in a FWA section) |
| Response to inquiries | REMOVED section that says billing inquiries are responded to in a timely manner |
| Business Information and Management information Systems | MOVED AND UPDATED sections on accuracy, retention, and confidential information and electronic media as they only refer back to policy and include general statements that books and records should be accurate (included in Privacy, Security, and Protection of Assets section) |
| Workplace Conduct – Conflict of Interest | MOVED AND UPDATED and reworded section to “Professional Interactions.” |
| Copyrights | REMOVED sentence that copyright law should be followed. |
| Personal Use of CCHP resources | MOVED AND UPDATED Covered in the Privacy, Confidentiality and Resources Section |
| Prohibited Conduct (Improper claims, false claims, excluded providers, medical necessity, kickbacks) | MOVED AND UPDATED , reworded, and streamlined under Business Practices |
| CCHS and CCHP Compliance Programs (how to report, duty to report, corrective actions) | MOVED AND UPDATED to Ethics, Introduction and Purpose Section. |