

# Non-Negotiable Standards of Excellence

## WHO WE ARE AND WHAT WE STAND FOR



The purpose of our Standard of Excellence is to reinforce Life Giving Resource's corporate values and to serve as a guide for our (*e*<sup>3</sup>) Philosophy of behavior. Your conduct reflects our belief that everything matters exponentially. There are no little things. Everything we say and do has a ripple effect that impacts those around us which in turn impacts those around them, and so on. Adherence to the Standard of Excellence promotes LGR's reputation for integrity, honesty, and professionalism in the communities we serve, and ensures that we are compliant with OPTN, CMS, and

OPO specific guidelines, policies, and operating procedures.

## COMPLIANCE QUESTIONS

Everyone is encouraged to contact the Chief Operating Officer for clarification or direction regarding the Standard of Excellence and Code of Contact. Please contact administration with any questions or concerns about performance expectations.

- For non-emergent questions or concerns, contact us toll free (1-855-LGR-GIFT). All calls will be returned within 24 hours.
- Send a direct email to the Chief Operating Officer at [sbryant@lifegivingresources.com](mailto:sbryant@lifegivingresources.com)
- Send an email to Staff Support at [ourteam@lifegivingresources.com](mailto:ourteam@lifegivingresources.com)



## **CODE OF CONDUCT PROFESSIONALISM AT ALL TIMES**



We display and promote the highest standards of professional and ethical conduct. We act with the competence, skill, and integrity expected of our professions. We behave with dignity and courtesy toward our clients, colleagues, associates, hospital partners, and donor families in all business-related activities. We are honest, fair, reasonable, and objective in our professional relationships.

## **ABIDE BY THE CODE OF CONDUCT AND APPLICABLE POLICIES AND PROCEDURES**



Supporting the critical needs of a large community is an enormous responsibility. If each of us abides by this Code of Conduct and the laws, rules, regulations, policies, and procedures that apply to us, we will do our part to see that Life Giving Resources operates with integrity. If you have questions about the appropriateness of a situation, ask your assignment supervisor or the Chief Operating Officer for clarification.

## **HONOR OUR CLIENTS, THEIR ASSOCIATES, AND HOSPITAL PARTNERS**



As a staffing support resource, we have an ethical responsibility to make our clients feel secure in our care and to treat them respectfully and with dignity. In addition to an ethical responsibility, we have a legal responsibility

to comply with all applicable laws and regulations related to industry standards. We must also comply with OPO specific policies and practices. While onsite in partnering hospitals, it is critical to remember that you are not only representing LGR... more importantly, you are representing the OPO in their community. Remember, ( $e^3$ )... EVERYTHING matters EXPONENTIALLY.

## PROVIDE QUALITY CARE



As a partnering provider for multiple OPO communities, we dedicate ourselves to providing high quality care for our patients and donor families. Quality care is a promise we deliver every day in every aspect of our work. We are committed to following all applicable policies, laws, and licensing / accreditation requirements

relating to quality of care and patient safety. We uphold professional standards of care, report safety concerns, and engage in quality improvement activities.

## FOLLOW OPO GUIDELINES IN CLINICAL PRACTICE AND FAMILY CARE



At Life Giving Resources, it is our responsibility to follow host OPO guidelines in our clinical practice and family care. As an invited support resource, it is essential for us to be prudent in our practice, being mindful not to over utilize or under utilize the services at our disposal. Willful practice outside the scope of OPO standard operating procedures without the permission of the host OPO supervisor is

unacceptable. “Rogue” coordinators are a liability to host OPOs. Bring your talents to the table, but leave unsolicited opinions behind. Remember ( $yI$ )... we are here to help and support our clients with their process standards, not impose our our.

## **PRESERVE PRIVACY, CONFIDENTIALITY, AND INFORMATION SECURITY**

Protecting patient privacy and confidential information is a Life Giving Resources priority. Confidential information includes health information about patients, donor families, information



in medical records, as well as proprietary information about host OPO and Life Giving Resources business practices. 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 and report concerns to appropriate parties. We investigate and report breaches of patient information and take

steps to secure systems from unauthorized access and comply with information security policies.

## **USE SOCIAL MEDIA AND TECHNOLOGY RESPONSIBLY**



Life Giving Resources encourages an online and social media culture that ***complies with the law, internal policies, procedures, and ethical values***. LGR Team Members may not disclose confidential or proprietary information about work activity, patients, donor family members, partner hospitals, or host OPO practices on social media (including, but not limited to, communications over the Internet, on personal websites or web pages, or in online communities).

We do not take or transmit photographs or recordings of patients, donor family members, or staff in the workplace except as permitted by policy or granted by exception from host OPO administration. Any questions concerning the appropriate use of social media and technology should be directed, as applicable, to your host OPO supervisor or administrator.

## **SUPPORT DIVERSITY AND INCLUSION**



Life Giving Resources supports a culture of diversity and inclusion. We treat everyone with respect. We do not tolerate illegal discrimination against anyone, including families, patients and clinical associates. We do not tolerate conduct that is disrespectful, hostile, intimidating, or harassing.

## **WORK SAFELY**



The health and safety of patients and associates is a Life Giving Resources priority. We comply with workplace health and safety laws and report safety concerns. We follow host OPO and Partner Hospital policies for handling and disposing of hazardous materials and equipment. We comply with fitness for duty policies.

Consumption of alcoholic beverages while on duty or during call hours is strictly forbidden and will result in immediate dismissal from the team. Recreational use of illegal substances is strictly forbidden and enforced by dismissal. We maintain a work environment free from violence and disruptive behavior.

## **COMPETE FAIRLY**



Life Giving Resources is committed to antitrust compliance and fair competition. We do not make unlawful agreements with competitors about prices or charges, services that we provide, or who to contract with. We do not discuss related matters, such as pricing policies, business practices, costs, marketing plans, or surveys with those outside of Life Giving Resources.

We comply with marketing policies and laws related to truth in advertising.

## RECORD AND REPORT INFORMATION ACCURATELY



We keep accurate records about patients, donor families, OPO and Transplant associates, physicians, clinical procedures, research trials, and allocation practices. It is the responsibility of each of us, when engaged in recordkeeping on behalf of Life Giving Resources (including employee invoices, medical records, and donor services), to be accurate and honest. For example:

- We do not sign another person's name to documents or share each other's passwords.
  - We amend the medical record only in accordance with host OPO and hospital partner policy and applicable law.
  - We do not fabricate, falsify or plagiarize documentation.
- Our records conform to applicable accounting principles. We retain all documentation related to business contracts, relationships, and transactions on behalf of our partnering OPOs and Transplant Programs.

*Protecting the interests of our clients with absolute integrity through legitimate business practices, transparency, and compliance with CMS regulations is a non negotiable standard of excellence. Although we are not directly governed by CMS, OPTN, etc... as an extension of our partner OPOs and Transplant Programs, compliance with industry standards is critical to our success and (most importantly) the protection of client operations.*

## DO NOT DO BUSINESS WITH EXCLUDED INDIVIDUALS OR ENTITIES



We expect all individuals and entities associated with Life Giving Resources to be appropriately credentialed, licensed and otherwise qualified to perform the duties outlined in their respective classification descriptions. As an ABTC Approved Provider and CertPATH Partner, LGR actively provides continuing education to prepare team members for board certification, pays for licensure examinations, and provides training and development in all 3 CEPTC Categories to ensure that team members meet the continuing education required to maintain their credentials. LGR does not do business with, employ, or bill for services rendered by individuals or entities that are excluded or ineligible to participate



in federal healthcare programs. Any LGR Team Member excluded (or under investigation for such), debarred, or otherwise ineligible to participate in healthcare programs at ANY time, for ANY reason has a responsibility to disclose this information to LGR's Chief Operating Officer and credentialing provider (as applicable).

## **COOPERATE WITH INQUIRIES, AUDITS, AND INVESTIGATIONS**



We cooperate with government inquiries as well as internal and external audits and investigations. When receiving non-routine requests, we consult with our Legal Department to ensure that requests are handled properly in collaboration with our clients. We are truthful in what we say.

We never alter or destroy records in violation of the law, OPO standard procedures, or LGR policies.

## **USE RESOURCES RESPONSIBLY**



We use LGR resources responsibly for LGR business purposes, not for personal gain. We spend LGR and host OPO funds wisely, eliminate waste, and control operational costs without compromising excellence.

Any physical assets issued by LGR and/or affiliated host OPOs such as computers, vehicles, machinery, and work space for LGR business will be protected from loss, damage, and theft. We don't waste supplies, equipment, space, or time.

We protect the intellectual property of LGR and our clients by respecting patents, software licensing, copyright, and other IP agreements.

## **DISCLOSE AND APPROPRIATELY MANAGE CONFLICTS OF INTEREST**



what might be a conflict of interest, notify LGR administration via the Compliance Policy process.

We disclose and appropriately manage conflicts of interest. Team members must report any actual or potential conflict 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. Depending on the circumstances, a “conflict of interest” might include: employment outside of LGR with a competitor or in violation of our policies, nepotism, profiting from confidential information, accepting gifts from associates, donor families, fellow providers, or willfully causing LGR to contract with vendors with whom you have a personal or financial interest. If you have questions about

## **PROHIBIT BRIBES, KICKBACKS, OR PAYMENT FOR REFERRALS**



We do not offer or accept bribes or kickbacks. Bribes and kickbacks are money, gifts, or special treatment given to someone in exchange for a favor. The favor may be many things, from a promise to make business referrals to a promise to use a particular vendor’s product.

We also do not offer or accept “something of value” for business referrals. “Something of value” includes money, services, gifts, entertainment, or anything else of value to the recipient. As this is a highly complex area of the law, team members must take special care and promptly refer any

questions to administration via the Compliance Policy process so that it can be reviewed by the LGR Legal Department.



## **PROHIBIT CERTAIN INDUCEMENTS AFFECTING DONOR FAMILY CHOICE**



The law prohibits LGR, OPOs, and its employees from offering certain inducements that may affect a family's decision about donation. For instance, it may be illegal to provide free services, gifts, or any other inducements of monetary influence.

However, patient value initiatives associated with host OPO policies may not be precluded. As this is a highly complex area of the law, team members must take special care and promptly refer any questions to administration via the Compliance Policy process so that it can be reviewed by the LGR Legal Department.

## **REPORT COMPLIANCE CONCERNS WITHOUT FEAR OF RETALIATION**



Team members are encouraged to contact administration whenever they need clarification or direction regarding Compliance issues (including this Standard of Excellence).

Team members are required to report suspected violations of the Standard of Excellence, policies, procedures, the law, and regulations to the Chief Operations Officer. Retaliation is not permitted against anyone who seeks advice, raises a concern, or reports misconduct in good faith. Such retaliation should be reported immediately to the LGR corporate legal department.

**Interested in joining our team?  
Contact us...**

[Call: 1-855-547-4438](tel:1-855-547-4438)

[Email: info@lifegivingresources.com](mailto:info@lifegivingresources.com)