



*Corporate Compliance  
& Integrity  
Code of Conduct*

**SELF REGIONAL**  
 HEALTHCARE



Mission

We improve health by bringing advanced care closer to home.

Vision

Through our exceptional physicians, inspired staff and innovative technologies, we will be the leading provider of advanced healthcare services for all communities that we serve.

**SELF REGIONAL**  
HEALTHCARE

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## *Our Commitment*

**Self Regional Healthcare** is committed to bringing advanced healthcare closer to home for all the communities we serve. All of us on the Self Regional team — board members, physicians, employees, vendors, independent contractors and volunteers — are proud to be associated with an organization that makes legal compliance and ethical business practices essential parts of our culture.

We all have the responsibility to protect and enhance Self Regional's strong reputation for honesty, integrity and excellence in patient care. It is vital to the success of the Corporate Compliance and Integrity Program — and the entire organization — that everyone associated with Self Regional Healthcare understands this **Corporate Compliance & Integrity Code of Conduct**. This will help guarantee that Self Regional Healthcare's services are provided in compliance with all policies, laws and regulations, and that we demonstrate the highest level of integrity in everything we do.

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## Non-profit Status

SRH is a charitable organization and, in order to maintain its tax-exempt status, must continuously engage primarily in activities which accomplish our goal of...

***providing the highest quality healthcare to all our customers, regardless of their ability to pay.***

In emergency cases, Federal **EMTALA** regulations require that all patients are given a specific health screening before determining their ability to pay.

## Patients' Rights

Our highest priority is to provide cost-effective care of uncompromising quality to all patients without regard to age, race, color, religion, national origin, gender, sexual orientation or disability.

We are committed to providing competent, compassionate, safe, skilled, honest and professional care. We can show this commitment in the following ways:

- ✚ Constantly seek to understand and respect the patients' objectives for care, while considering their spiritual, emotional, cultural and psychological needs.
- ✚ Treat all patients with dignity, while respecting their right to privacy and the confidentiality of their health information.
- ✚ Encourage family involvement in patient care, when practical and possible.
- ✚ Inform all patients about therapeutic alternatives and the risks associated with their care.

## Patient Confidentiality

Employees, volunteers and physicians will have access to confidential information. All medical, personal, financial and business information is considered confidential. All employees, volunteers and physicians must respect the confidentiality of information by not using or disclosing it unless necessary to do so in the course of their job duties.

**HIPAA** regulations allow us to use Protected Health Information, without specific written consent, if it is needed for **Treatment, Payment, Hospital Operations or as required by law**. The law also requires that we make all attempts to use only the minimum necessary amount of that information.

## Environment of Care

We are committed to providing a safe and healthy environment for all our patients and employees. Procedures for safety, security, hazardous materials, waste management, emergency management, fire prevention, medical equipment management, utilities management, the social environment of care and worker safety must be followed at all SRH facilities.

**Use of illegal drugs, alcohol or tobacco is not allowed on any SRH property.**

Employees may have access to prescription drugs, controlled substances and other medical supplies as part of their jobs. Employees have a legal and ethical responsibility, however, to maintain control over these items and report any possible problems to their immediate supervisor.

## Employee Relations (EOE/Harassment/ Solicitation)

SRH is an equal opportunity employer: employees will be recruited, hired, promoted, transferred, demoted or terminated on the basis of their skill, experience and performance — without regard to age, race, color, religion, national origin, gender, sexual orientation or disability.

We are committed to having a workplace that is open and respectful, free from harassment, intimidation, threats, and physical or verbal abuse. **Harassment in any form will not be tolerated.** If you feel that you or someone else is being harassed, please report it to the appropriate authority.



## Conflicts of Interest

Employees should avoid **conflicts of interest** and may not:

- ❖ Use SRH assets for personal benefit or personal business purposes.
- ❖ Have business dealings in products or real estate if the value may be affected by SRH's business.
- ❖ Disclose or use any confidential information — such as financial data, payer information, computer programs, or patient information — for their own personal or business purposes.

Employees considering a second job, consulting engagement or healthcare-related investment that may conflict or interfere with their duties as a SRH employee, should review their plans with their immediate supervisor or the VP of Corporate Compliance & Integrity. Approval in advance is required.

## Business Courtesies/Gifts

Gifts or entertainment offered by vendors or suppliers...

**should only be accepted after review and/or approval by the respective VP or the VP of Corporate Compliance & Integrity.**

Business courtesies or gifts should at no time be accepted, offered or provided **as an inducement to reward business or refer patients**. Under no circumstances may an employee solicit a gift from a vendor or supplier, nor may a gift or courtesy be extended to a potential referral source who solicits it.

## Safeguarding Property/ Confidential Business Information

Physical, financial, intellectual and electronic property and information owned by SRH are essential to our business.

**Theft, embezzlement or financial misconduct involving hospital property will not be tolerated.**

Billing/  
Charging/  
Coding

All staff must be careful to **properly charge, code and bill for services provided**. Billing for services not documented or provided could be considered a "false claim" and could result in financial penalties. Employees should **never charge, code or bill if the service was not provided or documented**. An employee who has concerns or questions should notify his or her supervisor or the Corporate Compliance & Integrity Department right away.

Accuracy of Records

All documents, financial reports or records, including the patient's medical record, are to be filled out in a clear manner. False or misleading wording in any record is not allowed. A signature that cannot be read must have a printed name below the signature. Any changes or corrections must be made according to our policies.

Medical Necessity

We will only provide and bill insurance and government programs for services that are **medically necessary**. We also work with our patients to make them aware, in advance, of any personal financial liability they may incur as a result of their care.

Federal Stark Laws &  
Anti-kickback Statute:  
Physician Relations

The **Federal Stark Laws & Anti-kickback Statute** guide us in developing and maintaining business relationships with physicians. The Federal Stark Laws prohibit physicians from making patient referrals to entities or businesses in which they or their family members have a financial interest. The Anti-kickback Statute is designed to prevent the offering of payments, gifts or other compensation in exchange for business. Both of these regulations have many exceptions and any questions about them can be answered by calling the Corporate Compliance & Integrity Department.

Marketing

SRH will only market those services we are capable of providing competently and with the highest quality. We will not produce any marketing materials that may be untruthful, misleading or cause confusion between our services and those of our competitors.



*Corporate Compliance  
& Integrity Program*

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## Foundation

Self Regional Healthcare's future viability and success are dependent on our commitment to maintaining high ethical standards and strict legal compliance in all aspects of our patient care and business relationships. It is also important for our patients, employees and suppliers to know that they are associated with an ethical and legally compliant healthcare organization.

Because of this, SRH has committed to the development of a **Corporate Compliance & Integrity (CC&I) Program** to act as the foundation for ethical patient care and business practices. Providing direction, guidance and oversight for the CC&I Program are the **Vice President of CC&I**, the staff of the **CC&I Department** and the **CC&I Committee**, which has members from various SRH departments.

## Cornerstones

The CC&I Program has been designed to help build employee awareness of the ethical standards established for providing care and conducting SRH business. These standards can be found in this **CC&I Code of Conduct** and other SRH policies and procedures.

It is the responsibility of each individual to be aware of and follow all general policies and procedures as well as those that apply directly to them.

## Education

Comprehensive **training and education** help ensure that all employees are aware of the standards that apply to their jobs, as well as their responsibility to help maintain an ethical culture at SRH.

Employees receive information about the CC&I Program during New Employee Orientation and annually thereafter. Additional information may also be requested by contacting the CC&I Department at (864) 725-5012.

## Communications

To encourage **open communication** of CC&I matters, SRH has developed a framework that employees can use to ask questions or report suspected violations of laws or SRH policies. Employees have the responsibility to report concerns about actual or suspected wrongdoing, and will...

**be able to do so confidentially and without the fear of retaliation or punishment.**

To enforce these goals, SRH's **Non-retaliation/Non-retribution Policy** establishes disciplinary guidelines for anyone taking action against an employee who reports concerns. The **Compliance Incident Response Policy** protects the confidentiality of employees and investigations to the greatest extent possible.

If you are an employee with compliance-related concerns or questions, you should contact:

- ✚ Your Supervisor
- ✚ Your Department Manager
- ✚ Your Department Director
- ✚ The CC&I Department

Alternatively, you may also use the **CC&I Helpline**, (888) 398-2633, or the **HIPAA Helpline**, (864) 725-4700.

## Addressing & Responding to Concerns

In addition to concerns that may be reported by employees, SRH uses many different tools and methods, including **auditing and monitoring** of certain issues, to identify potential areas of unethical behavior or activities. These tools are also used to guide the correction of issues that may put the organization at risk.

## Auditing & Monitoring

The success and effectiveness of the CC&I Program requires the use of audits and monitors to address compliance with all applicable laws, regulations and policies. Audits are generally used to determine compliance with specific issues (e.g., medical records documentation, federal reimbursement for patient care). Monitors are used to continually review issues that have been identified as potential problem areas (e.g., patient record access, charges for services).

## Enforcing Standards

In order to maintain the quality of the care we provide and prevent unethical conduct, SRH must actively enforce these laws and policies. In return...

**employees are expected to refrain from conduct that may violate laws or SRH policies.**

The SRH **Disciplinary Action** and **HIPAA Sanctions** policies are the basis for enforcing the standards that help us provide the highest quality, most ethical care possible.

Upon being hired, and during their annual evaluation, all employees sign SRH's **Compliance Affirmation**. This confirms their eligibility to participate in federally funded healthcare programs and their commitment to continue working within all applicable Federal and State regulations as well as SRH policies and procedures.



You must report any actual or suspected ethical or legal violation. Self Regional Healthcare will protect your confidentiality to the maximum extent possible and protect you from any retaliation for reporting your concerns.

If you have compliance-related concerns or questions, you should contact:

- ⊕ Your Supervisor
- ⊕ Your Department Manager
- ⊕ Your Department Director
- ⊕ The Corporate Compliance & Integrity Department

You may also use the **CC&I Helpline**, (888) 398-2633, or the **HIPAA Helpline**, (864) 725-4700.



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