



UNITED REGIONAL Corporate Compliance Plan

Purpose:

At United Regional our Passion is to provide excellence in health care for the communities we serve. The role of each employee in our daily interactions with stakeholders is to make a positive difference in the lives of others. An important part of this, and part of what we stand for, is operating in an ethical and legal fashion. To that end, we have developed the following corporate compliance plan.

UNITED REGIONAL is committed to lawful and ethical conduct throughout our operations. The Compliance Committee is charged with the responsibility to investigate and take appropriate corrective action with regards to all illegal or wrongful activities discovered. All UNITED REGIONAL employees have a duty to report such suspected activities. If all employees are vigilant in noting, documenting, and reporting such activities, such activities will not be able to continue and UNITED REGIONAL will remain a workplace with a standard of integrity that is beyond reproach.

When you encounter a situation that you believe to be unethical or in violation of the code of conduct, please consult your supervisor or another member of management. If you feel uncomfortable doing this, or it is inappropriate for a given situation, you may contact the Corporate Compliance Officer directly or call the **Compliance and Ethics Hotline at 2990** (764-2990 from outside the hospital). UNITED REGIONAL has a firm commitment that there will be no retribution for asking questions or raising good faith concerns about possible improper conduct.

If you have questions regarding UNITED REGIONAL Compliance Plan, you may contact UNITED REGIONAL Compliance Officer at 764-3047.

Phyllis Cowling
President and CEO

Dennis McGown
Compliance Officer

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Code of Conduct:

Purpose: The UNITED REGIONAL Code of Conduct provides guidance to all UNITED REGIONAL personnel in our daily activities, to ensure that our behavior is within ethical and legal standards. This code should guide our interactions with patients, physicians, payers, vendors, consultants, and one another.

All individuals and groups who operate on behalf of UNITED REGIONAL must hold the following values, and try to act accordingly: That all individuals we serve are treated with compassion, kindness, and dignity. That we will act lawfully, and with honesty, integrity and fairness, in the way we conduct our business. We will treat all other members of

UNITED REGIONAL family with loyalty and respect. This Code of Conduct is the minimum standard for all employees within all entities of United Regional. Some entities may establish more stringent standards of conduct.

Relationships with Patients:

1. Patients are treated in a dignified and respectful manner at all times.
2. **Patients are fully informed of their rights**, including the right to make decisions regarding their care. All UNITED REGIONAL employees receive training about patient rights in order to promote a clear understanding of their role in supporting patient rights. Patients are treated in a manner that preserves their dignity, independence, self-esteem, and civil rights. To obtain detailed information regarding patient rights and responsibilities, a current copy of the Patient Handbook is available from any Admitting representative.
3. **We insure patient involvement in all aspects of their care**, and obtain informed consent before treatment. Each patient or patient representative is provided a clear explanation of care including diagnosis, treatment plan, right to refuse or accept care, care decisions, estimation of costs, and risks and benefits associated with treatment options. Patients have a right to request transfers to other facilities, in which case they will be given an explanation of the potential benefits, risks, and possible alternatives. Patients are informed of their right to make advance directives. These will be honored within the limits of the law and UNITED REGIONAL mission and capabilities.
4. **Patients are accorded privacy and security**. Restriction of a patient's: visitors, mail, telephone or other communications are evaluated for therapeutic effectiveness and agreed on by the patient or patient representative.
5. Patients are informed of the opportunity to obtain pastoral services and resolution of complaints.
6. **Medical information is confidential**. This includes past, present, or future medical information, as well as patient identity and payment information. We do not release or discuss any patient information except in the service of the patient or as necessary for hospital

operations, and payment. See UNITED REGIONAL Patient Private Health Information Policy, 9441.5009, current version.

- 7. Emergency Medical Treatment is provided by UNITED REGIONAL to all patients**, regardless of their ability to pay. Patients are not transferred (without consent) to another facility unless their needs cannot be met at UNITED REGIONAL and they can be treated appropriately at the receiving facility. Patients are not transferred until they have been stabilized and accepted for care at the receiving facility. See Patient Transfers Policy, 9441.0900, current version.

Relationships with Physicians

Incentives: UNITED REGIONAL has a firm policy against either offering or accepting incentives in exchange for referrals. To avoid any appearance of impropriety, total annual value of all gifts given to any physician must be under \$300 adjusted annually for inflation (\$355 for 2009). This is a cumulative amount that includes gifts from any member of United Regional, and is tracked by Physician Relations.

1. No payment or other incentive is paid for referrals. This includes referrals for admission, outpatient services, or other referral services.
2. UNITED REGIONAL has a strict policy against accepting payment or other incentive for referrals made to other institutions.

All business arrangements with physicians are:

1. Structured to maintain full compliance with applicable laws
2. Formal written agreements utilizing terminology approved by counsel.
3. Details are contained in the Physician Contract checklist policy, current version.

Relationships with Third Party Payers

UNITED REGIONAL makes every effort to insure that all billings to government, private insurance payers, and individuals reflect accurately the services provided. UNITED REGIONAL takes great care to conform to all Federal and State laws and regulations regarding the billing of medical services. We do not knowingly present any claim for payment that is false or fraudulent.

UNITED REGIONAL conduct audits and monitors to verify that claims submitted are for medically necessary services provided and ordered by authorized medical providers. These audits are cognizant of the necessity of providing complete and accurate documentation of services. UNITED REGIONAL strives to maintain accurate and complete medical records.

When government programs require the submission of reports pertaining to our costs of operation, we comply with all Federal and state laws relating to any cost report.

UNITED REGIONAL makes every effort to ensure that subcontractors providing billing, coding or other related services on our behalf have the knowledge, skills, quality assurance processes, systems and procedures to provide these services in a lawful, accurate and complete manner. Further, all contracts written include documentation that all services are provided in accordance with current applicable laws.

Regulatory Compliance

1. Lawful conduct:

UNITED REGIONAL healthcare is provided within the framework of appropriate Federal, State and local laws and regulations. These laws may include regulations on subjects such as Federally funded health care programs, certificates of need, licenses, permits, accreditation, access and consent to treatment, record keeping, confidentiality of medical records, patients rights, terminal care decision making, medical staff membership and clinical privileges.

2. Knowledgeable personnel:

All UNITED REGIONAL personnel and associates, medical staff members, and contract service providers must be knowledgeable about and ensure compliance with existing laws and regulations. Any violations or suspected violations will be reported immediately to a member of management, the compliance line, or the corporate compliance officer.

4. Review of fraud alerts:

Periodically, the Inspector General notifies health care providers of areas of concern regarding adherence to government regulations. UNITED REGIONAL carefully reviews our compliance in these areas of concern (via monitoring if indicated) and insures that our policies and procedures provide adherence in these areas.

Government and Accrediting Agency Inspectors or Surveyors:

UNITED REGIONAL deals with government and accrediting agencies in an honest and forthright manner and cooperates with and is courteous to all government or other agency inspectors or surveyors. Information is provided as required for them to perform their inspection or evaluation. Documents are not concealed, altered or destroyed either during or prior to an inspection. UNITED REGIONAL employees do not lie or make misleading statements or cause a colleague to obstruct, mislead, or delay the communication of information or records to an inspector or surveyor.

Information and Information Systems

1. **All UNITED REGIONAL employees are charged with proper record maintenance.**
 - Accurate records are necessary to comply with regulatory requirements, to ensure that appropriate records are available to defend our practices and actions, and to protect the integrity of and confirm the effectiveness of UNITED REGIONAL compliance program.
 - No individual may falsify information on a UNITED REGIONAL record or document. Knowledge of any record discrepancy should be reported to management or the compliance line or officer.
2. **Retention of Records: All records, both medical and business, will be retained in accordance with the law and UNITED REGIONAL Maintenance of Records policy (94415004. current version).** Current conditions of Participation require records pertaining to Medicare claims to be retained for at least five years.
3. **Confidential information: Medical records and other UNITED REGIONAL business information are considered confidential information.**
 - UNITED REGIONAL employees may have access to this confidential information to the extent required to the performance of job responsibilities, but must not share information with others except those with a legitimate need to know, who have agreed to maintain confidentiality of the information.
 - Any subcontractors or outside businesses or individuals providing services on behalf of or for UNITED REGIONAL must agree to maintain the confidentiality of all UNITED REGIONAL medical records and other UNITED REGIONAL business information. All contracts with such outside businesses or individuals will specify that confidential information will not be disclosed except for allowed, lawful purposes.
 - Such confidential information includes but is not limited to: personnel and employee data, patient identity and information, pricing and cost data, business strategies and information, including salary and benefit information.
4. **UNITED REGIONAL personnel must be alert to situations where it is inappropriate to participate in discussions** with competitors such as trade association meetings. Subjects such as pricing, services, costs, and marketing plans must not be discussed.

5. **Requests of any type from the news media are forwarded to the Community Relations Department.**
6. **Requests for any employee information are forwarded to Human Resources.**
7. **Gathering information about competitors and other organizations is acceptable provided this is done through legal means** such as public information in the media and public presentations. It is not acceptable to gain information about another organization through any means that is illegal.
8. **All UNITED REGIONAL communications and information systems are the property of the organization and are intended for UNITED REGIONAL business use.**
 - UNITED REGIONAL employees must assume no right of privacy on United Regional communication equipment. Further, UNITED REGIONAL will monitor employee use of electronic mail and internet access.
9. **Personnel may not use any internal communication mediums for:**
 - Any threatening or maliciously false or obscene materials or language.
 - Any material that violates any laws or constitutes a criminal offense or creates a civil liability.
 - Any gambling or private for profit schemes.
 - Sending chain letters, personal broadcast messages, or copy protected copyrighted documents.
 - UNITED REGIONAL employees who abuse these guidelines will be subject to disciplinary action and loss of privileges.

Marketing of Services

UNITED REGIONAL believes that the best marketing plan requires honest, straightforward, fully informative and non-deceptive marketing. It is believed this approach is in the best interest of patients, physicians, and other entities, and physicians and other groups should fully understand the services that will be provided.

Workplace Conduct and Employment Practices

Note: The UNITED REGIONAL employee handbook covers most facets of workplace conduct and employment practices. All UNITED REGIONAL employees are encouraged to carefully review the Employee Handbook, found on United Regional's intranet "inside.urhcs.org" under the Human Resources tab. This Compliance

Code of Conduct gives guidelines for areas that are particularly compliance sensitive.

Conflict of Interest

All personnel, but particularly officers, directors, and other key employees owe a duty of undivided and unqualified loyalty to UNITED REGIONAL.

- Persons holding such positions must not use their position to profit personally or to assist others in profiting in any way at the expense at UNITED REGIONAL.
- Each employee must disclose to the Compliance Officer personal relationships and business activities with contractor personnel that may be construed by an impartial observer as influencing that individual's performance of duties.
- If a UNITED REGIONAL employee wishes to procure goods and services for the hospital from an entity in which she or an immediate family member is an employee or owns an interest, the employee securing the procurement must submit at least three bids. If the vendor selected is one in which the employee or family member owns an interest, the employee must submit written justification, based on lowest bid or higher quality, to the Compliance Officer.
- The Compliance Officer may authorize exceptions to the preceding requirement for procurements that are not possible to bid.
- The Compliance Committee will make a final ruling in disputed cases.

Other areas that are potential conflicts of interest include:

- Employee influence or potential to influence UNITED REGIONAL business decisions in a manner that could give the appearance of, or cause an impropriety.
- Employees disclosing UNITED REGIONAL business plans that could lead to the appearance of, or an actual impropriety.
- Demands of outside employment or other activities that hinder or distract you from the performance of your job.
- Outside activities that cause you to utilize UNITED REGIONAL resources for non-UNITED REGIONAL business use.

Conflict of Interest Policy: 9441.0100. current version.

If an employee, group or other interested person is not sure whether a conflict of interest exists in a situation, the Conflict of Interest Policy should be reviewed. When questions remain regarding a particular situation the Compliance Officer should be advised.

Business Courtesies

Business courtesies are tangible or intangible items given to or received from a business associate or potential business associate. Business courtesies must not be confused with gifts, or gratuities from patients or persons as a form of remuneration for the normal (or excellent) delivery of goods or services. Acceptance of money, gratuities (tips) in any form, from patients or persons for delivery of UNITED REGIONAL service or goods is not permitted. Employees are not allowed to solicit gifts or gratuities for the normal performance of their job duties, no matter how circumspect the solicitation.

Accepting Business Courtesies:

- 1. The following rules apply to business courtesies accepted by UNITED REGIONAL employees.**
 - a. Employees of UNITED REGIONAL are prohibited from accepting any gift or business courtesy that could be construed as an incentive for referrals or other consideration. This includes referrals for admission, outpatient services, or other referral services.
 - b. To avoid an appearance of impropriety, business courtesies with a total cumulative value over \$100.00 / year should not be accepted by any United Regional employee from any individual or organization having a business relationship with UNITED REGIONAL.
 - c. If you receive an invitation to a social event from a current or potential business associate to further develop your business relationship. You may accept this invitation provided:
 - 1) Overnight lodging is not included.
 - 2) Travel costs (other than a vehicle owned privately or by the associate's company) are not included.
 - 3) The \$100.00 / year limit noted in (a) is not exceeded.
 - d. UNITED REGIONAL employees may not accept cash, checks, or other forms of money as business courtesies. The lone exception is small courtesies made solely for the purpose of helping to sponsor an event held for UNITED REGIONAL employees, such as a celebration, or recognition event. Such events are not UNITED REGIONAL sponsored events, and the

limits established in the Compliance Plan for business courtesies apply. Any misuse of these courtesies is considered improper and subject to discipline up to and possibly including discharge from employment, as outlined in the Employee Handbook.

- e. Door prizes, drawings, awards, etc.
 - 1) The \$100 business courtesy limit will apply to any door prizes, drawing, or award that is given to an employee from a business associate or potential business associate.
 - 2) Because such awards or prizes reflect not just on the employee, but also on United Regional, no employee may accept an award or prize that exceeds the \$100.00 Business Courtesy limit and turn the award over to the Foundation or another department within United Regional.
 - 3) This \$100 limit does not apply to door prizes, drawings, or awards that an employee may receive from United Regional or in United Regional sponsored events.

- f. Courtesies given to a department or group within UNITED REGIONAL may be accepted, provided the total value of such courtesies from any single source does not exceed \$500.00 annually or more than \$50.00 per person annually.

2. Training and educational opportunities:

You may accept invitations to learn about new products and services, providing:

- a. Prior approval has been received to do so. See Policy 9441 2200, current version, Continuing Education, Travel, Business and Professional Meetings.

- b. Employees and their approving Vice-President must make a good faith effort to determine that educational opportunities will be the major focus of such events prior to accepting an invitation to attend such events.

- c. Such events must not have an itinerary that is focused on social events to the point they could be construed as an incentive to purchase a particular product or service.

- d. When attending training and educational opportunities, travel, lodging and meals **may be** included in the opportunity and may be accepted by the employee, provided the cost associated with such an opportunity is reasonable and appropriate. Training and educational opportunities expenses may exceed the \$100 per year limit that is associated with business courtesies.
 - e. Often when attending an educational event that includes an overnight stay, entertainment or an invitation to a social event is included. It is acceptable for the employee to attend such social activities provided the event satisfies the criteria outlined above.
 - f. Award drawings / door prizes associated with such events: The award / door prize rules as stated in 1 (e) apply to door prizes associated with training and educational opportunities.
3. Honorariums:
- a. Employees are not allowed to personally accept honorariums offered as an incentive.
 - b. Any honorarium accepted by a UNITED REGIONAL employee must be given to the hospital.
4. Under no circumstances may any UNITED REGIONAL employee solicit a personal gift for the normal performance of their job duties.

Extending Business Courtesies

1. While in the course of developing and maintaining a good business relationship, small business courtesies may be exchanged. The following guidelines apply.
 - a. Employees of UNITED REGIONAL are prohibited from giving any gift or business courtesy that could be construed as an incentive for referrals, or for influencing business outcomes. "Referrals" includes referrals for admission, outpatient services, or other referral services.
 - b. To avoid an appearance of impropriety, business courtesies with a total cumulative value over \$355.00 / year should not be given to any individual or organization having a business

relationship with UNITED REGIONAL from all sources within United Regional.

- c. Cash, check or other forms of money may never be given as courtesies.
- d. The federal and state governments have strict rules concerning gifts and other business courtesies for their employees. No courtesies (beyond minor refreshments at business discussions) can be given to any government employee.
- e. If a question arises regarding whether an offering constitutes an incentive, it should be referred to the Corporate Compliance Officer. In the event of a dispute regarding what constitutes an improper offering or incentive, the Compliance Committee will make the final decision.
- f. Extending business courtesies for entertainment / social events:
Extending an invitation to a current or potential business associate to a social event for the purpose of furthering or developing your business relationship is acceptable provided:
 - 1) The purpose is not to induce a favorable business action, and topics of a business nature are discussed.
 - 2) Prior approval at the director and at least one level higher in the organization has been received.
 - 3) Overnight lodging is not included.
 - 4) Travel costs other than by private or UNITED REGIONAL vehicle is not included.
 - 5) The business courtesy limit of \$100.00 per year applies.

2. Sponsoring business or educational events:

UNITED REGIONAL may sponsor events for business or educational purposes. When such events are sponsored, meals and entertainment may be offered, and lodging and transportation may be paid for. In all cases prior approval at the director level and at least one level higher is required. These sponsored educational events may exceed the \$100 pre year business courtesy limit.

Hiring of Former and Current Government Employees

Because the rules are complex, may change frequently, and vary by employee, Human Resources should be consulted in each case prior to discussing employment, conducting an interview, or extending an offer of employment to former or current government employees or contracted individuals.

Personal Use of UNITED REGIONAL Resources

UNITED REGIONAL assets are to be utilized for conducting UNITED REGIONAL business, and all employees should maintain stewardship over the utilization of those assets including materials, supplies and equipment, as well as information and employee time.

- Infrequent use of items such as copying equipment and telephones (excluding private long distance calls) is permissible provided such use is not excessive.
- Directors and Managers are responsible for determining when non-business use of UNITED REGIONAL assets is excessive, and for taking appropriate steps to prevent such usage, including disciplinary action, as appropriate in the circumstances.
- Utilization of UNITED REGIONAL resources for charity or community events must have prior approval from the Vice President over the resource.
- Utilization of UNITED REGIONAL resources for personal financial gain or outside business activities, or for personal political activities is prohibited.

Gift giving:

Gift giving takes place among UNITED REGIONAL employees in various situations:

- No employee should ever be made to feel obligated to give a gift to anyone.
- When gifts are given among employees, the gifts should be appropriate to the circumstances.
- Under no circumstances may any employee solicit a personal gift for the normal performance of their job duties.

Fund raising:

- UNITED REGIONAL administration authorizes fund drives or other support for specific worthwhile causes such as the System's Foundation, United Way, and Children's Miracle Network.
- When such fund raising activities are authorized, UNITED REGIONAL resources, including employee time, facilities, and supplies may be utilized.

- However, no employee should be made to feel compelled to participate in these causes.

Relationships with Subcontractors, Suppliers, and Educational Institutions

- UNITED REGIONAL will follow high ethical standards in negotiating and determining the type and nature of our business relationships and other contract commitments.
- Relationships with outside entities must be consistent with current applicable laws and industry standards.
- Selection of subcontractors, vendors, and suppliers will be made based on objective criteria including: cost, quality and technical excellence of goods and services, timeliness and adequacy of delivery, and quality of customer service.
- Written agreement with educational institutions defining both parties' role will be in place in all cases before the program begins operation in any UNITED REGIONAL facility. In all cases, students and personnel representing educational institutions will fall under UNITED REGIONAL code of conduct while at any UNITED REGIONAL facility.

License and Certification: Contracted Services:

Independent contractors who are required to maintain professional licenses or certification are responsible for maintaining current status on their credentials and will comply with all applicable Federal and state requirements for their respective discipline. UNITED REGIONAL retains the right to request evidence of current licensure from independent contractors. UNITED REGIONAL does not allow any independent contractor to operate without valid current licensure as such credentialing is a requirement to lawful practice.

Research:

Any research or studies performed by UNITED REGIONAL staff or associated groups must be conducted within the highest ethical standards. Research misconduct is not tolerated. This includes falsifying the results of research to affect or alter conclusions, and/or claiming the results of other research or studies without actually performing the research. See Research - Human Subject Studies Policy # 9441.2430, current version.

Environmental Compliance

It is UNITED REGIONAL' goal to comply with all environmental laws and regulations plus maintain appropriate permits and controls as required. Additionally it is our goal to be as "environmentally friendly" as possible, preserving natural resources through efficient operation and frugal use of water, power, and other resources.

All hazardous and medical waste will be disposed of in a manner consistent with laws and regulatory guidelines. Environmental compliance policies are maintained by the UNITED REGIONAL Safety Officer.

Controlled substances / Alcohol and illegal drugs

UNITED REGIONAL is committed to an alcohol and drug free work environment. See pertinent sections of Employee Handbook for in depth information on this subject.

Courtesy and Diversity Issues and Workplace Harassment:

A key element in creating and maintaining positive relationships with all individuals we interact with is courteous treatment of all persons without regard to their race, creed, color, sex, national origin, age, disability, veteran status, religion, or socio-economic status. All employees are afforded the right to work in an environment free from harassment, discriminatory intimidation, ridicule, and insult based on any of these factors.

See the Employee Handbook for additional information on these subjects.

Sexual Harassment:

UNITED REGIONAL does not tolerate workplace sexual harassment. Additional information in the Employee Handbook details:

1. What constitutes Sexual Harassment
2. What to do if you are a victim of sexual harassment.
3. Supervisory and UNITED REGIONAL / Human Resources responsibilities
4. Punishment for sexual harassment

Health and Safety:

It is the policy and practice of the System to provide a safe environment in which to work. System policies have been developed to assist in protecting you from potential workplace hazards. It is each employee's responsibility to promote workplace safety. You should become familiar with and understand how these policies apply to your specific job, and seek advice from your supervisor or the Safety Officer when you have a

question or concern. Unsafe situations should be reported to your supervisor, System management or the Safety Officer. The Safety Officer maintains Health and Safety Policies and Procedures. See the Employee Handbook for additional information on Health and Safety.

The Compliance Program:

The UNITED REGIONAL Board has proclaimed that URCHS compliance with all federal and state guidelines is a critical goal, and establishing and maintaining an active compliance program is key to the operation of UNITED REGIONAL. The board further specifies that the Compliance Officer, as spokesperson for the Compliance Committee will have access to the Board and Chief Executive Officer (CEO), and that the Compliance Program will have adequate funding and staff to perform designated responsibilities fully. When necessary, the Compliance Committee will seek the advice of UNITED REGIONAL counsel. The CEO will have ultimate authority and responsibility for the implementation of a viable Corporate Compliance Program.

The Corporate Compliance Officer:

The Corporate Compliance Officer is responsible for the following:

1. Overseeing and monitoring the implementation of the compliance plan.
2. Reporting at regular intervals to the UNITED REGIONAL Board, CEO, and Compliance Committee on the progress of implementation, and assisting them in establishing methods to improve the System's efficiency and quality of services, and reducing the System's vulnerability for fraud, abuse, and waste.
3. Periodically revising the Compliance Plan to reflect changes in the needs of the System, and changes in laws and policies of government and private payer health plans.
4. Developing, coordinating, and participating in a multifaceted education and training program that focuses on the elements of the compliance program and seeks to ensure that all appropriate employees and management are knowledgeable concerning the program and pertinent federal and state standards.

5. Ensuring that independent contractors and agents who furnish medical services to the hospital are aware of the requirements of the System's compliance program with respect to all concerned activities, and agree to adhere to the pertinent components of the program, as well as applicable federal and state law.
6. Coordinate with the System' Human Resources Department to ensure that the National Practitioner Data Bank and Cumulative Sanction Reports have been checked with respect to employees, medical staff, and independent contractors.
7. Participating with the System's Finance Department in coordinating internal compliance review and monitoring activities, including periodic reviews of departments.
8. Independently investigating and acting on matters related to compliance, in response to reports of problems or suspected violations, and work with the hospital Leadership Team to recommend and take corrective action with appropriate System departments, providers, and contractors.
9. Stressing a policy of non-retribution and personal involvement to encourage managers and employees to report suspected fraud and other improprieties.
10. Review of all documents and other information that are relevant to compliance activities, including: patient records, billing records, marketing effort records, HR records, and contractual arrangements with other parties.

UNITED REGIONAL Compliance Committee

The "Consensus Opinion and Grievance Body" consists of the following:

Compliance Officer and Chairperson
 President / Chief Executive Officer
 Executive Vice President and Chief Operating Officer
 Chief Financial Officer
 VP of Quality and Chief Medical Officer
 VP of Patient Care Services
 Vice President of Marketing / Communications
 Vice President of Facilities Management

Compliance Committee work groups will be smaller groups formed with specific members of the above team and individuals listed below.

Director of Materials Management

Director of Billing and Collections
Director of Admitting
Director of Womens / Childrens Services
Director of Pharmacy
Director of Laboratory
Director of Imaging
Director of Medical Management
Director of Medical Records
Coding Service Leader

In addition to the above members, the Compliance Committee will request the assistance of additional technical or other personnel when appropriate.

The Compliance Committee will perform the following:

1. Identify specific compliance risk areas and prioritize monitoring and correcting problems in the areas given priority.
2. Assess existing policies and procedures designed to address these areas for possible incorporation into the compliance program.
3. Work with appropriate departments to develop standards of conduct and policies and procedures to promote compliance with the institution's program.
4. Recommending and monitoring in conjunction with relevant departments, the development of internal systems, policies, and procedures as part of its daily operations.
5. Determine appropriate strategies for UNITED REGIONAL to promote compliance and detection of potential violations.
6. Participate in compliance education
7. A grievance body for compliance related issues.

Reporting Violations:

- All UNITED REGIONAL employees have a duty to report any suspected unethical or illegal activities. If all employees are vigilant in noting, documenting, and reporting such activities, such activities will not be able to continue and UNITED REGIONAL will maintain a standard of integrity that is beyond reproach.
- When you encounter a situation that you believe to be unethical or in violation of the code of conduct, or you are asked to perform an unethical or unlawful act you must report.
- You may report directly to your supervisor or any member of management. If you feel uncomfortable doing this, or it is inappropriate for a given situation, you may contact the Corporate Compliance Officer, or call the Compliance Hotline at 2990 (764-2990 from outside the hospital). There will be no retribution for asking questions or raising good faith concerns about possible

- improper conduct. Concerns may be reported confidentially or anonymously.
- Any employee who deliberately makes a false accusation with the purpose of harming or retaliating against another employee or individual will be subject to discipline, as outlined in HR policy.
 - Whistleblowers are subject to the same standards of behavior and performance expectations as other United Regional employees.
 - Those who report, or whistle blowers, are assured of the following:
 - The report will be investigated
 - When unethical or unlawful activities are discovered they will be corrected.
 - All reasonable steps will be taken to protect the anonymity of whistleblowers when this is requested.
 - There will be no retaliation for any good faith report of suspected improper activity.
 - Feed back will be provided to the reporter if requested.
 - Employees and others are strongly encouraged to report concerns internally. United Regional will not retaliate to Whistleblowers who report to an outside regulatory agency.

Investigations of and Response to Reports:

- An investigation of all reported concerns will be initiated within 72 hours of receipt by the Compliance Officer, and investigated promptly and thoroughly, while maintaining confidentiality to the fullest extent possible.
- The Compliance Officer will coordinate the investigation and recommend corrective action. When appropriate, outside counsel will be retained to direct the investigation. When an investigation is directed by counsel, strong consideration will be given to counsel's advice on remedial action and reporting.
- All employees are to cooperate fully with such investigations.
- All concerns reported via the hotline or through other methods will be fully documented, along with the results of the investigation, and corrective action taken (if applicable). This documentation is maintained by the Compliance Officer, and must include the following:
 1. Description of the alleged violation.
 2. Description of the investigative process
 3. Copies of the interview notes and key documents
 4. A log of witnesses interviewed and documents reviewed.
 5. Results of the investigation and any disciplinary action taken
 6. Corrective action implemented
- If the reporter requests anonymity, this will be protected.

- There will be no retaliation for any **good faith** report made to Compliance.
- The individual reporting a concern may request and obtain a verbal summary regarding that investigation from the Compliance Officer.
- Additionally, the Compliance Officer will present a regular report of concerns and investigations to the CEO and a synopsis report to the Board of Directors.

Corrective Action

When violations are discovered as a result of an investigation, corrective action will be complete. Appropriate corrective actions include:

- Prompt restitution of any overpayment amounts
- Notifying the appropriate government or other agency
- Disciplinary action, as appropriate to the circumstances.
- Making system changes and education of employees to prevent a similar violation or problem from reoccurring.

When after investigative inquiry, UNITED REGIONAL has reasonable grounds to believe that misconduct either violates law, or constitutes a violation of civil law or rules and regulations governing federally funded health care programs, UNITED REGIONAL will contact the appropriate government authority within 60 days, pending the advise of legal counsel.

Potential cost impact and any evidence relating to the misconduct will be turned over to the government to the extent approved by counsel.

Discipline

- All violators of the UNITED REGIONAL Code of Conduct will be subject to disciplinary action.
- The discipline in each case will be determined in accordance with Human Resources policy. HR Policy outlines disciplinary actions as follows in order of severity:
 1. Verbal counseling
 2. Written counseling
 3. Unfavorable ratings in annual performance evaluations, reviews of work product
 4. Suspensions from work
 5. Other actions up to discharge from employment.

Ongoing Monitors

- Monitors or audits are established in problem prone areas, especially those areas that have regulatory and compliance implications.
- These audit areas will be monitored for compliance.
- When audit areas exceed established triggers, or for areas where no deviation is acceptable corrective action and system changes will be implemented to move these areas into compliance.
- In some departments such as billing and laboratory designated indicators are monitored on a regular basis.
- The Compliance Officer will maintain copies of all monitored areas and corrective action.
- Whenever corrective action has been implemented, additional audits will be conducted to ensure compliance in the respective area.

Employee Education / Evaluating employee compliance

All employees will be made aware of the UNITED REGIONAL Code of Conduct and will be asked to sign an acknowledgment indicating they have reviewed and understand the code and are aware of the requirement to report suspected illegal activities and the means by which they may do so.

New employees will receive orientation on the Code of Conduct by the Compliance Officer or a designee, and be asked to sign an acknowledgement.

Certain employees, and other groups, who work in high risk or problem prone areas for compliance issues will attend or have provided to them special training, so that they may be cognizant of the special considerations they must be aware of to maintain UNITED REGIONAL compliance. This training will be documented and kept in the employee's education file.

Attendance and participation in offered training programs is a condition of continued employment. Failure to meet training requirements will result in disciplinary action up to and possibly including termination from employment.

As an indication of UNITED REGIONAL commitment to lawful and ethical behavior, compliance issues will be considered in decisions regarding the hiring, annual evaluations, and promotion of UNITED REGIONAL managers and supervisors, and other personnel as appropriate.

Supervisory personnel* will be evaluated on how well they perform the following: More emphasis will be placed on these actions for supervisors in compliance sensitive areas.

- Endorsement of the compliance program
- Effective discussion with supervised employees the compliance policies and legal requirements applicable to their job functions
- Informed employees that strict compliance with these policies and requirements is a condition of employment and that disciplinary action will be taken up to and possibly including termination of employment for violation of compliance policies and legal requirements
- Diligence in detecting non-compliance with applicable policies and legal requirements, where reasonable diligence on the part of the manager or supervisor would have led to the discovery of any problems or violations and given the hospital the opportunity to detect them earlier.

* Supervisors, Managers, Directors, Officers

Non Employment of Sanctioned Individuals:

- UNITED REGIONAL will conduct a check on all new employees and all prospective employees to ensure they are not listed as disbarred, excluded, or otherwise ineligible for participation in federal healthcare programs.
- Current employee checks will be conducted annually
- Groups or individuals in a contractual arrangement with UNITED REGIONAL will be checked to for appropriate credentialing and to ensure that they are not listed as disbarred, excluded or otherwise ineligible for participation in federal healthcare programs. Further, all contracted groups or individuals are asked to sign a statement stating that they will not employ sanctioned individuals.
- Contracts will be terminated with groups or individuals who become ineligible for participation in federal health care programs while under contract with UNITED REGIONAL. Additionally, disbarred employees or contractors will not be listed on UNITED REGIONAL' cost report.

Additional Compliance Policies are followed and are updated regularly regarding the following:

- Business courtesies
- Conducting an Investigation
- Government Requests for Information
- Maintenance of Records
- Lawful Business Practices
- Excluded Party Screening
- Unapproved or Off-label Use and Billing of Drugs or Devices
- Patient Private Health Information Policy
- Photography / Videotaping Policy
- Health Care Industry Representative Protocols for United Regional
- Identity Theft Prevention “Red Flag Rules” Program
- Confidential Event Reporting
- Conflict of Interest
- Physician Recruiting
- Care of Information
- Patient Transfers
- Courtesy Discounts
- Research – Human Subject Studies