

INFIRMARY HEALTH CODE OF CONDUCT



Corporate Compliance
INFIRMARY HEALTH

The renewed Infirmary Health (IH) Code of Conduct is intended to be a simpler, impactful summary of the standards of behavior we expect from all IH employees, individuals and entities that provide significant service to IH.



A statement from our President & CEO, Mark Nix

We are excited to publish this new version of the Code of Conduct for Infirmary Health. In order to emphasize our full commitment to compliance with all federal and state healthcare program requirements and applicable laws and regulations, we have simplified the Code of Conduct to make these expectations easier to remember and more applicable to every day workplace situations. While every situation you encounter may not be addressed, each standard is supplemented by policies and operating procedures that provide more detailed guidance. We expect everyone to have a working familiarity with this new Code of Conduct and supporting policies and procedures.

We value and actively demonstrate our organization's core values and behaviors. Our mission is LIFE...

Leadership – Setting the example

Integrity – Doing the right thing

Family – Supporting each other along the way

Excellent Service – Exceeding our customer's expectations

Our mission establishes our commitment to compliance and to each other and ultimately our overall success.

Compliance Contact

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Compliance Hotline:
800-431-2590

IH Code of Conduct Standards

- 1. Comply with Laws and IH Policies/Procedures.** Comply with all federal and state healthcare and other applicable government program requirements and IH's own policies and procedures. IH commits to a comprehensive compliance program and plan to detect the prevention of healthcare fraud, waste and abuse.
- 2. Suspect Something, Say Something.** Individuals or entities are expected to report any suspected violations of these standards to Compliance or the Compliance Hotline. Ask questions and seek guidance regarding any compliance issues.
- 3. Follow Ethical Business Practices.** Adhere to the professional organization standards and only engage in activities that are permitted by your job function and your role and responsibilities.
- 4. Be Mindful of a Potential Conflict of Interest.** A "conflict of interest" happens when personal interests come before the interests of IH. Examples of a conflict include: accepting something of value because of your position, creating a business relationship for personal reasons, lobbying for political reasons on behalf of IH, involvement with outside employment that affects your job at IH, working with outside boards or committees that have a relationship with IH.
- 5. Providers will be Qualified.** IH staff members providing patient care will be properly licensed and credentialed. All entities and individuals that provide significant service to IH will be screened for exclusions and sanctions to participate in a federal and state healthcare programs monthly.
- 6. Practice Effective Contracting with Potential Sources of Healthcare Business or Referrals.** All contracts will be in writing, impartial and meet the requirements of the Anti-Kickback Statute and Stark Law.
- 7. We will Accurately and Promptly Reflect Financial Information as Required.** IH has created internal/external accounting controls to ensure transactions are properly approved and relate to our business. All documentation will be based on true and accurate information.
- 8. Committed to Accurate and Truthful Advertising and Marketing.** All media inquiries, interviews, marketing and advertising is handled solely by the IH Marketing Department.
- 9. No Snooping.** IH values and is committed to privacy in all matters. Access patient and business information ONLY when needed to perform a job function. Always secure protected health information and business communications.
- 10. Non-Retaliation, Confidentiality, Anonymity.** IH is committed to its non-retaliation policy and will maintain, as appropriate, the confidentiality and anonymity of compliance reports.