

Corporate Compliance Program - Organizational Code of Business Ethics

Administrative Policies & Procedures

Document Number: MHS-ADMIN-01-1006

Revision #: v2

Document Owner: Donna Ciufu, DNP, RN

Date Last Updated: 01/15/2013

Author: Senior VP, Legal Affairs and General Counsel

Status: Approved and Released

General Description

Purpose: Meridian Health System (MH) is committed to the practice of sound ethical behavior, legal and regulatory compliance in all its activities and to further its Mission, Vision and Values. The Corporate Compliance Program (CCP) was developed to provide for the consistent and accurate communication of corporate policies and procedures in the areas of compliance with laws, regulations and Meridian's Code of Conduct. The CCP is intended to guide, direct and support each team member in undertaking responsibility for and support of an environment of compliance.

High standards of ethical conduct will be maintained in all practices including, but not limited to: patient care, admission, transfer, discharge, billing, marketing, and relationships with other healthcare providers, educational institutions, and payors.

Care, treatment, and services are provided based on assessed patient needs, regardless of compensation or financial risk-sharing with those who work in our health care facilities, including staff and licensed independent practitioners.

Scope: This policy shall apply to all medical, business, and legal activities performed by Meridian Health System trustees, officers, team member, medical staff members, residents, volunteers, and contractors.

Policy: Meridian Health System has an ethical responsibility to its patients and the communities it serves. The Code of Conduct is the foundation of Meridian's Compliance Program and contains standards of conduct. The standards are supplemented by other policies in effect at Meridian, such as those found in the Team Member Handbook and Meridian's Policies and Procedures. The Code of Conduct strongly supports and promotes Meridian's Mission, Vision, and Values and is available on line at:

<http://intranet.meridianhealth.com/index.cfm/HumanResources/codeofconduct.cfm>

The Compliance Program promotes adherence with all applicable laws, regulations, and guidelines. All team members must receive general compliance education when they begin employment. They receive department specific compliance education during the department's specified orientation period. Part-time team members are required to receive compliance training through coordination with Human Resource Department work orientation schedules.

Team leaders are responsible for ensuring compliance with legal and regulatory requirements and Meridian's ethical standards by:

- discussing the Code with team members who report to them and educating them on its importance;
- answering team members' questions on the Code and assisting them in understanding its provisions;
- responding appropriately to detect and correct any violations and prevent reoccurrence;
- being proactive and not condoning or ignoring misconduct that comes to their attention;

- explaining the MH process for resolving and researching reported issues and addressing new developments within the compliance and regulatory arena.

All current full- and part-time team members of Meridian Health System are required to receive general compliance education annually. Department leadership is responsible for developing and implementing an education program that details operational elements necessary for each job function to ensure compliance with all applicable laws, regulations, and requirements.

Persons involved with Meridian have a duty to report any suspected violations of the Code. The Code provides a confidential and anonymous means for reporting suspected violations through the ComplyLine without fear of retribution. Additionally, the Code allows a person involved with Meridian to report suspected violations directly to their team leaders, Human Resource representative, Corporate Compliance Officer or the Office of Legal Affairs without fear of retribution or retaliation.

Claims of ignorance, good intentions or bad advice are not acceptable excuses for non-compliance. Failure to comply with this Code of Conduct can include (1) violating the standards in the Code, (2) failing to remedy a violation, (3) failing to act in a timely and reasonable manner once an issue is known, or (4) failing to report a suspected violation.

- Procedure:**
1. The Corporate Compliance Department or their designees:
 - a. Educate all new team members through the traditions process.
 - b. Provide education through pre-established methods.
 - c. Offer specific education methods to best suit the needs of Meridian.
Methods include, but are not limited to
Live presentations;
Videos; and
Written materials
 - d. Review and Revise the program as needed.
 2. The Corporate Compliance Department coordinates with other departments such as Human Resources, Risk Management, and Nursing Education to schedule and conduct the required general compliance education inservices. These groups work together to:
 - a. determine teaching methods and materials as needed;
 - b. advertise or arrange for advertisement of training programs;
 - c. track attendees and provide attendance information to management;
 - d. schedule and prepare meeting locations.
 3. The Corporate Compliance Department will report regularly to the Compliance and Audit Committee of the Meridian Board on all issues relative to the compliance initiative and the ongoing efforts, audits, and activities of the Corporate Compliance Program. Monitoring of the Meridian compliance program with applicable internal and external standards will be coordinated with the Internal Audit Department of Meridian and with external specialists as necessary in accordance with annual workplans for the Compliance and Audit Committee. The Compliance Operations Group provides advice and general guidance on matters relating to corporate compliance within all companies of Meridian Health.

GUIDELINES

Meridian's Code of Conduct contains standards of conduct which reflect Meridian's commitment to business ethics, legal and regulatory compliance. Such standards include the following areas and others described in greater detail in the Code.

PATIENT CARE

- To remain sensitive to and supportive of the ethnic, cultural diversity of patients, and to provide the same level of care regardless of such diversity.
- To provide patients with understandable explanations of their medical condition, recommended treatment, expected results and reasonable medical alternatives and to obtain a

- patient's informed consent before treatment.
- To respect and protect confidentiality.

ADMISSIONS, TRANSFERS, DISCHARGES

- Patients will be admitted, transferred and discharged without regard of ability to pay for services, age, race, color, age, national origin, religion, creed, sex, disability, sexual orientation or diagnosis.
- When it is determined that a hospital cannot provide for a patient's immediate or continuing needs, appropriate medical examination and stabilization will occur and the patient will be transferred to another facility or service capable of providing for these needs.

BUSINESS PRACTICES

- Patients shall be billed for services and supplies provided to them
- All decisions made by Meridian are made solely to promote the best interests of Meridian without any conflict of interest.
- All trustees, physicians, volunteers, consultants, staff, students and persons under contract with Meridian shall refrain from receiving inappropriate gifts or money compensation in return for doing business or having a relationship with Meridian. Meridian has Conflict of Interest policies and procedures for team members and medical staff members to assure appropriate relationships between patient care, treatment, services and any financial incentives. These policies are available upon request.
- Accurate and complete financial records are maintained and serve as the basis for business management, for fulfilling Meridian's obligation to patients, team members, contractors, suppliers, and others and for compliance with tax and financial reporting requirements.

MARKETING

- Advertising will communicate to the public only those services available within the system's scope of services. At no time will statements be permitted in advertisements which are intentionally misleading.

Revision History

v1: 01/06/2006
Document Created

v2: 01/15/2013
Minor edits made

Authorization History

Marc H. Lory
Executive Vice President, Hospital Operations
v1
Date Approved:
09/28/2011