

TALLAHASSEE MEMORIAL HEALTHCARE, INC. (TMH)

Code of Conduct and Business Practice Guide

Every Employee Must Commit to the Following Standards:

1. **PROVIDE QUALITY CARE AND SERVICES**

We are committed to providing quality care and services to our patients, their families, visitors and the community by:

- Providing treatment and medical services without discrimination.
- Listening and doing our best to understand the needs of our patients, families and visitors by promptly addressing any issues or complaints.
- Including patients in decisions regarding their medical care by providing complete and unbiased information with patients and families in ways that are affirming and useful.
- Ensuring clinical duties are performed by properly trained, licensed or credentialed individuals. We will conduct appropriate background checks on all potential employees and also verify credentials and qualifications of licensed health care professionals providing services at our facilities.
- Ensuring patients and families receive timely, complete, and accurate information in order to effectively participate in care and decision-making.
- Acknowledging that patients and their families are to be informed about the outcomes of care and associated risks.
- Providing the patient a choice from the available home health agencies, durable medical equipment (DME) suppliers, long-term care providers, ambulance services and rehabilitation providers.
- Providing appropriate medical screening and necessary stabilizing treatment to all individuals who come to the hospital seeking emergency care, without delay to inquire about method of payment.

2. PROMOTE FAIR EMPLOYEE TREATMENT

We are committed to providing a work environment throughout the organization that promotes fair treatment and complies with laws in all matters relating to employment at TMH by:

- Demonstrating appropriate respect and consideration for one another.
- Applying all Human Resources Policies & Procedures fairly, equitably and consistently, regardless of position.
- Hiring, training, promoting and compensating on the basis of personal competence and potential for advancement without regard for race, religion, gender, national origin, age, marital status, creed, citizenship or disability, or other classification protected by law.
- Maintaining an environment free of harassment, disruption, intimidation or hostility.
- Encouraging open expression of concerns and use of the problem-solving process.
- Protecting an employee's job status, working conditions or employment relationship if he/she, in good faith, follows the Problem Resolution Procedure or contacts the Compliance Office.

3. COMPLY WITH THE LAW IN ALL BUSINESS PRACTICES

We will provide healthcare services and otherwise conduct our business in compliance with laws, regulations and standards that apply to the services provided by TMH by:

- Pursuing only those business opportunities that are both legal and ethical.
- Refraining from engaging in illegal business practices including bribery, kick-backs or payoffs, intended to influence the decisions of TMH colleagues or any external representative.
- Marketing and advertising truthfully and accurately.
- Ensuring that every contract payment or other benefit paid to physicians is for specifically defined services at fair market value.

- Maintaining company business records accurately and truthfully and discarding them only according to retention guidelines.
- Recording financial transactions in accordance with generally accepted accounting principles, established accounting policies and internal control policies.
- Ensuring that contracts are approved by legal counsel as and when required by TMH policies and signed only by authorized agents of TMH.
- Acting in good faith in contractual relationships.
- Complying with copyright laws for materials such as software, printed and audiovisual works.
- Complying with Risk Management reporting requirements.

4. RESPECT AND PROTECT CONFIDENTIAL INFORMATION

We will ensure the responsible use of patient, visitor, employee, business or other confidential information by:

- Maintaining the confidentiality of protected health information concerning our patients and TMH by using and sharing it according to established Privacy and other guidelines.
- Limiting access to confidential information to only those who need to know.
- Refraining from discussing confidential information in public areas.
- Preventing others from examining, making copies of, or sharing confidential documents or information without authorization.
- Not disclosing to any outside party any restricted nonpublic business information, plans or data acquired during employment with TMH, unless specifically authorized to do so by management.
- TMH is committed to ensure compliance with HIPAA's security and privacy standards.

5. CODE, BILL AND COLLECT IN ACCORDANCE WITH APPLICABLE GUIDELINES

We are committed to integrity in our coding, billing and collection practices by:

- Maintaining honest and accurate records of all services provided to patients. We will submit charges for services and products in accordance with applicable laws and regulations.
- Ensuring bills submitted for payment are properly coded, documented and billed in accordance with applicable laws and regulations.
- Ensuring that medical information is properly documented in patient records in a timely manner.
- Using codes that accurately describe the services that were appropriately ordered by physicians or health affiliates and actually provided to patients.
- Preventing the submission of claims for payment or reimbursement of any kind that are fraudulent, abusive, inaccurate or medically unnecessary including, but not limited to the following:
 - Billing for items or services not provided to patients;
 - Upcoding for higher reimbursement than is supported by documentation;
 - Submission of claims for outpatient services that are required to be included with an inpatient stay.
 - Submission of duplicate bills (more than one claim for the same service);
 - Unbundling claims (submission of bills in a fragmented fashion to maximize reimbursement if guidelines require the services be billed together);
 - Inclusion of costs that are not allowable to be reimbursed in a cost report; and
 - Billing for a patient discharge when it is appropriate to bill the claim as a patient transfer.
- If a billing error is discovered, we will take immediate steps to correct the error, and promptly refund or collect any payments due and owing in accordance with TMH Policies and Procedures.

6. AVOID CONFLICTS OF INTEREST

We will conduct ourselves with integrity, honesty and fairness to avoid any conflict between personal interests and the interests of TMH by:

- Graciously declining any offers of money from patients, their families, visitors and others which are not intended for the benefit of TMH and refer such offers to the TMH Foundation.
- Not providing, or appearing to provide, payment or other benefits for referrals of patients.
- Not accepting gifts/gratuities offered in exchange for favorable treatment.
- Not using any proprietary or nonpublic information acquired as a result of employment with TMH for personal gain or the gain of another organization.
- Not accepting educational activities grants that create the appearance of a conflict of interest or exchange for favorable treatment.
- Following the Conflict of Interest Policy in reporting any circumstances that could cause a conflict of interest.
- Conducting all fundraising ethically, within the guidelines and in support of TMH and the TMH Foundation.
- Not contributing or donating TMH funds, products, services or other resources to any political cause, party or candidate without the advance approval of the General Counsel.

7. SAFEGUARD ASSETS, PROPERTY AND INFORMATION

We will use our resources wisely and will be accountable for their proper use by:

- Maintaining, preserving and being personally responsible for TMH assets, property, facilities, equipment and supplies, as well as the property of others.
- Reporting time records accurately and using time at work responsibly for work-related activities.
- Ensuring that property is disposed of in accordance with TMH Policies and Procedures.
- Using E-mail, Voice-mail, Intranet, Internet and other present and future electronic communications responsibly and for limited personal use in accordance with TMH policies and procedures.

8. MAINTAIN A SAFE ENVIRONMENT

We are committed to providing a safe environment for our patients, staff and visitors by:

- Recognizing, correcting and/or reporting unsafe practices, conditions or potential hazards that may violate any rule, regulation or TMH policy and procedure.
- Refraining from any threats or acts of violence. Immediately reporting such acts or threats to a supervisor and/or Security.
- Using TMH equipment, property and medical products appropriately.
- Using care in the handling and disposal of medical waste or other hazardous materials.
- Eliminating or minimizing hazards to the health and safety of employees, patients and visitors.
- Refraining from using illegal drugs either on or off the job, using non-prescribed controlled substances, or reporting to work under the influence of alcohol.
- Not manufacturing, distributing or possessing a controlled substance or drug not medically authorized.

WHAT TO DO WHEN YOU BELIEVE THERE MAY BE A PROBLEM

- Refer to TMH's Compliance Program and/or Policies and Procedures for additional information.
- Contact your department manager or, if necessary, up to the appropriate Vice President or Senior/Executive Vice President.
- Contact Human Resources for employment-related matters to begin the Problem Resolution Procedure as outlined in the TMH Personnel Policy and Procedures Manual.
- Contact the Compliance Office at 2667 or the Compliance Hotline at 877-772-6723 to seek additional information or report improper conduct.
- Submit a Compliance or Privacy concern to the HealthCare Safety Zone Portal.

You are encouraged to resolve issues, whenever possible, by utilizing TMH's existing Policies & Procedures or by contacting your department manager or, if necessary, other appropriate Vice President or Senior/Executive Vice President. If you are unsuccessful in using this approach, the Compliance Hotline is available to you 24 hours/day.

When calling the Compliance Hotline, you may remain anonymous. Should you choose to identify yourself, your identity will be protected to the limit of the law. Concerns brought to TMH attention through the Compliance Hotline will be promptly and thoroughly evaluated and investigated for proper resolution.

IMPORTANT TERMS TO KNOW

Abusive/Abuse – Inappropriate, consistent or incorrect practices that directly or indirectly lead to incorrect payment for services; abusive acts may be committed without certainty of knowledge, willfulness or intention.

Billing for Services and Items Not Rendered – Submitting a claim which represents that the provider performed a service all or part of which was not performed.

Colleagues - All TMH Employees, Medical Staff members, temporary per diem personnel, volunteers, students and others rendering paid or unpaid services to TMH, and all TMH Agents.

Compliance Program – A process designed to promote ethical and honest practices in our day to day operations, detect and prevent illegal activities by employees, physicians, vendors and all others providing services and/or doing business within TMH.

Conflicts of Interest – Any situation in which the personal interest of any individual may conflict with the interest of the TMH System.

Copyright Laws -- Laws granting the legal right for exclusive publications, products, sale or distribution of material to the author or designated individual. Material cannot be reproduced without written permission of the copyright holder.

Credentialed/Credentialing – The process of assessing qualifications and granting privileges to licensed healthcare professionals to treat patients.

Duplicate Billing – Submission of more than one claim for the same service of the bill is submitted to more than one primary payer at the same time.

Fraudulent/Fraud – False statements, representation or concealment of material facts to obtain a benefit or payment for which no entitlement exists; acts that are committed knowingly, willfully and intentionally.

Good Faith Reporting – Reporting an act of known or suspected non-compliance based upon facts or observations that the individual making the report considers to be true to the best of their knowledge and belief.

Harassment – An inappropriate or unwelcome act or series of acts that significantly impacts the ability of another individual to perform his/her duties.

Informed Consent – Informed consent is a process which involves exchange of information between the patient and practitioner as well as permission, approval or assent. Informed consent is consent given by the patient based on knowledge of the nature of the procedure to be performed and its risks, benefits and alternatives, including neuroleptic drugs.

TMH Agents - Includes all persons and entities that have contracted with TMH to provide health care related services, equipment or other goods or services.

Upcoding – The practice of using billing codes that provide a higher payment rate than the billing code that actually reflects the service furnished to the patient.