



Sierra View Medical Center

Code of Conduct

PURPOSE:

To ensure Sierra View Medical Center (SVMC) fulfills its ethical responsibility to patients, staff, Medical Staff, contingent work force, third party payors, subcontractors, independent contractors, vendors, consultants, students, volunteers, one another and the community. This Code of Conduct was developed to meet our ethical standards and comply with applicable laws and regulations.

DEFINITIONS:

SVMC: For the purposes of this Code of Conduct, SVMC refers to Sierra View Medical Center, which includes all Medical Center departments, services, and clinics maintained and supported under the California Department of Public Health hospital license.

SVMC Staff: For the purposes of this Code of Conduct, SVMC Staff refers to SVMC employees.

SVMC Contingent Work Force: For the purposes of this Code of Conduct, SVMC Contingent Work Force refers to; Travelers, registry, contractors and subcontractors.

SVMC Medical Staff: For the purposes of this Code of Conduct, SVMC Medical Staff refers to Physicians and credentialed allied health practitioners.

SVMC Board of Directors: For the purposes of this Code of Conduct, the Board of Directors refers to the SVMC Governing Board.

POLICY:

It is the responsibility of every SVMC staff member, contingent work force member, Medical Staff member and Board member to act in a manner that is consistent with SVMC's policies and procedures, Values, and this Code of Conduct. Additionally, SVMC Medical Staff are governed by specific conduct rules outlined in their Bylaws.

MISSION, VISION AND VALUES STATEMENT:

Sierra View Medical Center is committed to upholding the highest standards of ethical behavior in improving the quality of life and health of our community. We are driven by our Mission and Vision.

Our Mission:

SVMC promotes health and ensures access to high quality healthcare services. This will be achieved:

- Through partnerships and collaborations
- By being a good steward of resources to ensure that we can continue to meet the health needs of the community.

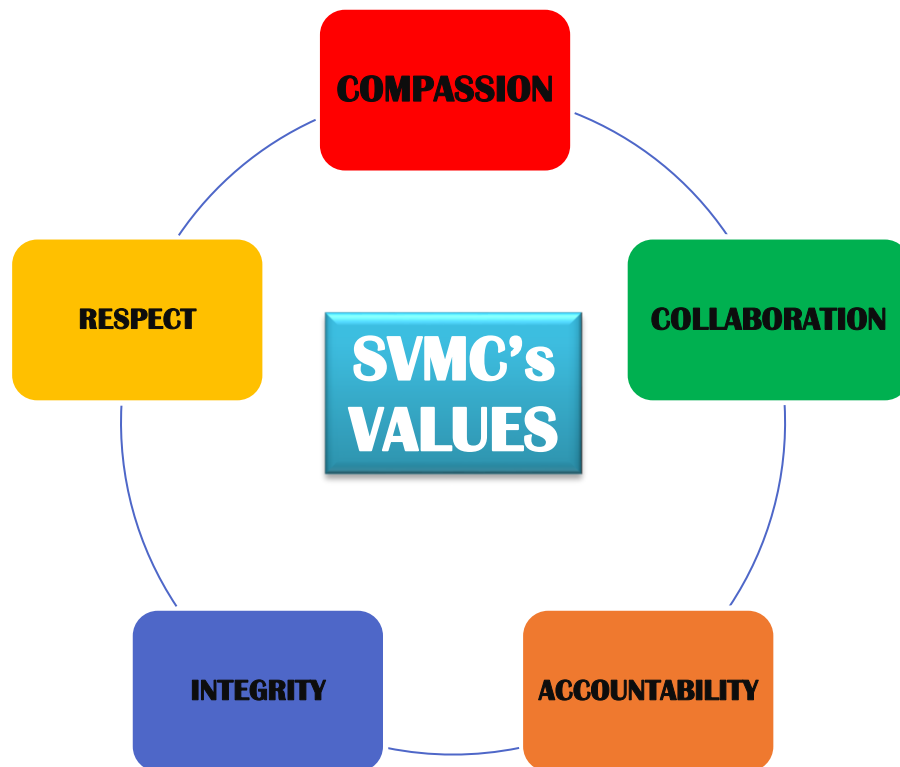
Our Vision:

Strengthen the quality of life through the delivery of integrated health care programs and services that promotes access, care coordination, and patient care experience.

Our Values:

SVMC is committed to our core values:

- **Compassion:** Caring from the heart
- **Collaboration:** Partnering for a common purpose
- **Accountability:** Accepting ownership of our actions
- **Integrity:** Inspiring trust and honesty
- **Respect:** Embracing and appreciating others



A MESSAGE FROM THE CEO

Dear Sierra View Medical Center Colleagues,

We are committed to providing quality health care in an environment that promotes compliance with applicable laws, regulations, and ethical standards. To assist in fulfilling this commitment, Sierra View Medical Center (SVMC) is supported by a Compliance Program managed by the Compliance Officer and assisted by the Compliance Committee, which includes directors and members of senior leadership.

Our Code of Conduct is our most important policy, presented as a basic set of guidelines which reflects SVMC's culture, ethics, mission, vision and values. It defines our organizational and individual responsibilities and describes SVMC's expectations regarding your conduct, and the conduct of all employees, ranging from Senior Leadership to entry level positions. The Code of Conduct also combines with our individual judgment and personal accountability in forming the foundation of our professional behavior.

If you believe you have witnessed a potential or suspected violation of SVMC's Code of Conduct, SVMC policy or applicable law(s) or violation(s), please follow the reporting instructions on page 8 of this Code of Conduct, which includes details on our anonymous Compliance Reporting Hotline at (559) 791-4777 or ext. 4777. Retaliation against any employee, whom in good faith reports potential or suspected violations, will not be tolerated.

I appreciate your commitment to our mission, vision and values, and thank you for serving our patients, colleagues and hospital with integrity and for truly making a difference.

Sincerely,

Donna J. Hefner
President and Chief Executive Officer



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PURPOSE OF OUR CODE OF CONDUCT:

The Code of Conduct is a primary component of the Sierra View Medical Center (SVMC) Compliance Program, and has been developed to assist SVMC in complying with federal, state and local law, and to promote ethical conduct consistent with the mission, vision and strategic goals of SVMC.

The Code of Conduct is intended to:

- Describe the basic legal and ethical responsibilities expected of SVMC Staff, Contingent Work Force, Medical Staff, Students, Volunteers, Independent Contractors and Vendors.
- Inform SVMC Staff, Contingent Work Force, Medical Staff, Students, Volunteers, Independent Contractors and Vendors about existing SVMC policies and procedures.
- Explain the duty to report instances of suspected misconduct.
- Explain how to report suspected misconduct without fear of retaliation.

SVMC's expectation is that you follow the Code of Conduct and Values, as well comply with all other applicable laws, regulations, and SVMC policies and procedures, whether or not specifically addressed in this Code of Conduct.

Everyone at SVMC shall receive the Code of Conduct upon initial orientation and when significant updates occur. Staff shall acknowledge receipt of the Code of Conduct by electronic signature through the online Learning Management System or by signing and submitting an Attestation form to Human Resources.

Our ability to succeed depends on integrity, knowledge, diversity, respect and teamwork. While it is impossible to portray every situation one might encounter, or every detail of the policies, the Code of Conduct should serve as a guide for how we are expected to conduct ourselves while performing our professional duties on behalf of SVMC. Additional information and specific guidance on many of the topics covered in this Code of Conduct can be found in our Policy Library via the SVMC Intranet (<http://home/>).



PERSONAL CONDUCT:

SVMC's reputation for the highest standards of conduct is reliant on the high level of mutual trust and responsibility that exists between Staff and the Organization. You, as an individual, are essential to the Organization's success. SVMC's integrity and reputation are in your hands and validated by those who exercise good judgment and act in accordance with this Code of Conduct and the law.

This means you are held accountable for:

- Reading the Code of Conduct and understanding how it applies to you.
- Referring to the Code of Conduct and SVMC policies to guide your daily work activities.
- Asking questions when you need clarification or help.
- Reporting all suspected misconduct to the appropriate SVMC personnel.
- Completion of assigned training.

If you have questions or concerns not fully addressed in the Code of Conduct or found in a SVMC policy, your next step should be to discuss the issue with your Manager. Other resources are also available, such as Compliance, Human Resources, Security, Employee Health, Information Technology, Health Information Management, and Financial Services. For current contact information, refer to the most recent phone directory located on the SVMC intranet home page.

DUTY TO REPORT:

There may come a time when you are made aware of a known or suspected violation of law, the Code of Conduct, or a SVMC policy. If you become aware of any questionable activities made by staff, contingent work force, Medical Staff, students, volunteers, independent contractors or vendors that appear to violate applicable laws, rules, regulations, conditions of participation,

policy, or this Code of Conduct, you have a duty to report the incident. You should always report suspicious or questionable behavior even if you are not sure there is a problem. Failure to report a violation is a serious violation in itself and may result in disciplinary action.

You can report incidents via:

- Your Supervisor
- The Compliance Officer at (559)791-3838 or Compliance Audit Analyst at (559)791-3917
- Human Resources
- The Compliance Hotline (**see Compliance Hotline below**)
- A Compliance Incident Report form (Found on the Compliance page on the Intranet and submit in the lock box in SVMC's mail room)
- Email to ComplianceOfficeinbox@sierra-view.com
- The electronic event reporting program

COMPLIANCE HOTLINE (559)791-4777 or ext. 4777:

The Hotline is a confidential means of reporting ethical and compliance violations or concerns, or to ask Compliance-related questions. The Hotline is answered during normal business hours by Compliance staff and after hours by a recorded greeting which prompts you to leave a message. When reporting a concern, you can remain anonymous, although you are encouraged to identify yourself as it increases the exchange of vital communication and the ability to request additional information related to the incident being reported, should the need arise. If you disclose your name, but request confidentiality, the Compliance Officer will keep this information confidential to the extent permitted by law. See the Compliance Hotline policy.

INTERNAL INVESTIGATIONS:

Violations of the Code of Conduct, failure to comply with applicable federal or state laws, and other types of misconduct threaten SVMC's status as a reliable and honest provider of health care services. Detected but uncorrected misconduct can seriously endanger SVMC's business and reputation, and can lead to serious sanctions against the Medical Center. Consequently, upon reports or reasonable indications of suspected noncompliance, prompt steps to investigate the conduct in question will be initiated under the direction and control of the Compliance Officer to determine whether a material violation of applicable law or the requirements of the Compliance Program has occurred.

You are strongly encouraged to cooperate with investigations into potential misconduct. Any attempt to obstruct an investigation or the reporting of misconduct is subject to disciplinary action, up to and including, termination of employment.

If such a violation has occurred, prompt steps will be taken to correct the problem, taking into account the root cause of the problem. As appropriate, such steps may include an immediate referral to criminal and/or civil law enforcement authorities, a corrective action plan, a report to the Office of Inspector General (OIG) or any other appropriate government organization, and/or submission of any overpayments. The specific steps that are appropriate in any given case will be determined after consultation with legal counsel.

Depending upon the nature of the alleged violations, the Compliance Officer's or designee will conduct a thorough and complete internal investigation, which could include interviews with relevant personnel and a review of relevant documents and may enlist experts from external resources, such as legal counsel, auditors or health care experts.

All interactions and information related to the investigation is kept confidential to the extent possible. To help ensure integrity of the investigation process, staff is also asked to practice discretion by refraining from discussing the information and Compliance Office consultation with colleagues or coworkers.

RETALIATION:

SVMC strives to uphold a culture where you feel comfortable in your work environment and can report known or suspected inappropriate conduct, activities or unethical behavior without fear of retaliation. All levels of leadership have a responsibility to create an atmosphere that facilitates open and honest discussion around issues that may negatively impact the organization. Retaliation against someone who files such a report will not be tolerated. Employees who participate in retaliation will be subject to disciplinary action.

Retaliation is defined as any action, statement, or behavior that is designed to punish an individual for filing a compliance report, cooperating with a compliance investigation, seeking guidance regarding a compliance concern or to deter one from taking such action. Retaliation includes, but is not limited to intimidation, adverse action against an employee regarding the terms and conditions of employment, such as termination, demotion, or suspension.

Protection is extended to *anyone* filing a Compliance report or inquiry or providing information in relation to an investigation. If you or others have been retaliated against, report this behavior to your supervisor, Compliance or Human Resources. All reports made in "good faith" are protected from retaliation, retribution, or harassment.

Good faith is defined as reasonably believing or perceiving the information reported to be true.

Please note that SVMC reserves the right to discipline employees who knowingly make a false accusation, provide false information to the Organization or have acted improperly.

For further information on Retaliation, see SVMC *Non-Retaliation-Compliance Issue Reporting and Harassment* policies.

WORK ENVIRONMENT:

SVMC strives to provide a safe and productive work environment. The work environment must be free from discrimination and harassment based on race, color, religion, sex, sexual orientation, age, national origin, disability, veteran status, medical condition, marital status or registered domestic status or other factors that are unrelated to the organization's legitimate business interests. SVMC does not tolerate sexual advances, actions, comments or any other conduct in the workplace that creates an intimidating or otherwise offensive environment. Similarly, the use of racial or religious slurs — or any other remarks, jokes or conduct that encourages or permits an offensive work environment — will not be tolerated.

If you believe that you are subject to such conduct, bring such activity to the attention of the Organization, either by informing your supervisor, Compliance or Human Resources. SVMC considers all complaints of such conduct to be serious matters, and all complaints will be investigated promptly.

Some other activities that are prohibited because they clearly are not appropriate are:

- Threats;
- Violent behavior;
- The possession of weapons of any type;
- The distribution of offensive jokes or other offensive materials via e-mail or any other manner; and
- The use, distribution, sale or possession of illegal drugs or any other controlled substance, except to the extent permitted by law for approved medical purposes.

In addition, staff, contingent work force, Medical Staff, students, volunteers, independent contractors, and vendors may not be on the premises or in SVMC work environment if under the influence of or affected by illegal drugs, alcohol or controlled substances used other than as prescribed. Please refer to SVMC policy: *Drugs and Alcohol in the Workplace* for additional information and further guidance on using medications in the workplace.

EMPLOYEE PRIVACY:

SVMC collects and maintains personal information that relates to staff's employment, including medical and benefit information. Access to personal information is restricted solely to people with a business need to know this information. Personal information is released outside the Medical Center or to its agents only with employee approval, except in response to appropriate investigatory or legal requirements, or in accordance with other applicable law. Employees who are responsible for maintaining personal information and those who are provided access to such information must ensure that the information is not disclosed in violation of the organization's *Employee's Right to Privacy* policy or other applicable laws or regulations.

PATIENT'S RIGHTS (HIPAA) & SAFETY:

SVMC is committed to providing safe and compassionate treatment and care where patients and their families understand his/her individual condition or illness, as well as the recovery process. Collectively with Medical Staff we will provide the patient or patient's representative with information regarding the diagnosis and anticipated treatment plan. We will provide a clear explanation of the right to refuse or accept care and to make an advance directive, and the risks and benefits associated with available treatment options, organ donation or procurement, as well as financial and insurance information. Discharge planning begins at the time of admission and continues throughout the admission. The patient, the patient's representative or guardian, designated family members, and the clinical team will be involved in the discharge planning process.

SVMC provides each patient with a written statement of patient rights and a notice of privacy practices. These statements conform to all applicable state and federal laws, including but not limited to the Health Insurance Portability and Accountability act of 1996 (hereinafter referred to as HIPAA). Each patient has the right to copy and inspect much of the PHI that we retain on their behalf. All requests for access to PHI must be submitted in writing and signed by the patient or the patient's representative. If a patient believes that the PHI we maintain on their behalf is incorrect or incomplete, they have the right to request in writing that their PHI be amended or corrected. SVMC is not obligated to make all requested amendments, but will give each request careful consideration. Patients have the right to submit written request restrictions of our uses and disclosures of their PHI for treatment, payment, or health care operations.

SVMC supports and facilitates patients' rights to access guardianship, advocacy, conservatorship, child and/or adult protective services by providing information as requested and referrals. The Social Services Department is responsible for ensuring that the proper protective agencies are notified as required by county, state and federal laws.

SVMC treats all patients with compassion and respect. SVMC makes no distinction in the availability of services; the admission, transfer or discharge of patients; or in the care we provide based on age, race, sex, economic status, educational background, color, religion, ancestry, national origin, sexual orientation, gender identity/expression, disability, medical condition, marital status, registered domestic partner status, genetic information, citizenship, primary language, immigration status (except as required by Federal Law). SVMC recognizes and respects the diverse backgrounds and cultures of its patients and makes every effort to equip its caregivers with the knowledge and resources to respect each patient's cultural heritage and needs.

SVMC maintains an ongoing, proactive patient safety program for the identification of risk to patient safety and the prevention, reporting and reduction of healthcare errors. The hospital addresses the resolution of grievances from patients and their families through a formal process which includes informing patients of whom to contact regarding the grievance resolution. Please refer to the following SVMC policies for further guidance related to Patient Safety and Patient's Rights: *Patient's Right to Privacy*, *Patient's Rights and Responsibility*, *Patient Safety Plan*, and *Reporting Suspected Child Abuse & Neglect*. All policies are located in the policy library via the Intranet.

PATIENT INFORMATION:

SVMC is committed to ensuring confidentiality of records and related information for all patients. In the course of providing care, SVMC may collect information about a patient's medical condition, financial information, and family or medication history. SVMC will be sensitive to the personal nature of this information, and will maintain its confidentiality at all times. Patient information will not be released or discussed unless it is necessary to serve the patient or required by law.

In accordance with SVMC privacy and security policies and procedures, which reflect HIPAA requirements, no SVMC Staff has a right to any patient information other than that necessary to perform his or her job or responsibilities. Any breach of confidentiality represents a failure to meet the professional and ethical standards expected, and constitutes a violation of this Code of Conduct. A full confidentiality statement is received and accepted by each employee as part of the Employee New Hire process. SVMC also expects its vendors involved in patient care to perform and provide services consistent with all applicable HIPAA laws.

Policies for reference include the following: *Patient Identity Theft Prevention, Detection, And Mitigation Program (Red Flags Rule), Patient Privacy – Program Requirements, Patient Privacy– Patient's Right to Access, Release of Patient Information, and Confidentiality.*

REGULATORY COMPLIANCE:

SVMC provides many types of healthcare services. These services are provided pursuant to appropriate federal, state, and local laws and regulations, and federal conditions of participation. Such laws, regulations, and conditions of participation may include, but are not limited to, subjects such as certificates of need, licenses, permits, accreditations, access to treatment, consent to treatment, medical record-keeping, access to medical records and confidentiality, patients' rights, clinical research, end of life care decision making, and Medicare and Medicaid program requirements. The organization is subject to other numerous laws in addition to these healthcare laws, regulations, and the conditions of participation.

SVMC has developed policies and procedures to address many legal, accreditation, certification and regulatory requirements. However, it is impractical to develop policies and procedures that encompass the full body of applicable law, standards, conditions and regulations. Such laws, standards, conditions and regulations not covered in organizational policies and procedures must still be followed. There is a range of expertise within SVMC, including operations counsel and numerous functional experts, who should be consulted for advice concerning human resources, legal regulations and statutes, established standards and applicable conditions of participation.

Accreditation and Surveys:

From time to time, government agencies and other entities conduct surveys at SVMC. Accreditation or external agency surveys are extremely significant and broader than the scope of this Code of Conduct. In preparation for, during and after surveys, SVMC staff must comply with all accrediting and external agency surveyors in a direct, open and honest manner and with accurate information.

In preparation for, or during a survey or inspection, SVMC staff must never conceal, destroy, or alter any documents, lie; or make misleading statements to the agency representative. Also, SVMC staff must never attempt to cause another staff member to fail to provide accurate information or obstruct, mislead, or delay the communication of information or records relating to a possible violation of law. No action should ever be taken, directly or indirectly, to mislead the accrediting or external agency survey teams.

EMTALA:

SVMC complies with the Emergency Medical Treatment and Active Labor Act (EMTALA) in providing emergency medical screening examination and necessary stabilization to all patients – including pregnant women and their unborn children – regardless of their ability to pay. A Medical Screening Exam (MSE) shall be performed on all patients presenting to the SVMC Emergency Department with a medical emergency or requesting treatment for an emergency medical condition. If a patient elsewhere on hospital grounds requests treatment for an emergency medical condition, SVMC will expedite that patient to the Emergency Department for care. If, based on a MSE, it is determined the patient suffers from an emergency medical condition, SVMC is obligated to provide services within its capabilities to stabilize the patient. This must all be accomplished prior to requesting financial information from the patient.

SVMC does not admit, discharge, or transfer a patient with an emergency medical condition simply based on their ability or inability to pay or any other discriminatory factor. A patient with an emergency medical condition is only transferred to another facility at the patient’s request or if the patient’s medical needs cannot be met at SVMC and appropriate care is knowingly available at another facility. Patients are only transferred in strict compliance with state and federal EMTALA regulatory and statutory requirements.

Please refer to the *Intra-facility Transfers and EMTALA – Inter-facility Transfers, MSE, Emergency Care and Stabilization* policies.

MEDICAL STAFF:

Healthcare services like those owned and operated by SVMC are a collaboration between Hospital Staff and Medical Staff members. As in any collaboration, each party has important roles and responsibilities that they must adhere to. SVMC is committed to providing an excellent work environment for our Medical Staff employees and contingent workforce

The Identification and Management of Disruptive Behavior policy establishes that SVMC has an environment that requires all individuals, employees, physicians, allied health practitioners and other independent practitioners to conduct themselves in a professional and cooperative manner within the facility and to define the behaviors that:

- Interfere with high quality patient care.
- Disrupt the orderly administration of Sierra View Medical Center
- Disrupt the orderly administration of the independent Medical Staff
- Affects the abilities of others to do their jobs.
- Creates a hostile work environment for Hospital or Medical Staff members.
- Adversely affects or impacts the community's confidence in the Hospital's ability to provide exemplary patient care

SVMC requires Medical Staff members to be familiar with this Code of Conduct, in addition to the Bylaws governed by the Medical Staff Rules and Regulations.

Interactions with Physicians:

Federal and state laws and regulations govern the relationship between hospitals and physicians who may refer patients to SVMC. The applicable federal laws include the Anti-Kickback Law and the Stark Law. It is important that SVMC Staff who interact with physicians (particularly those SVMC Staff who make payments to physicians for services rendered, provide space or services to physicians, recruit physicians to the community, and/or arrange for physicians to serve in leadership positions in the organization) are aware of the requirements of the laws, regulations, and policies that address relationships between SVMC and physicians. If relationships with physicians are properly structured, but not diligently administered, a failure to administer the arrangements as agreed results in a violation of the law. Any arrangement with a physician must be structured to ensure compliance with legal requirements. Most arrangements must be in writing and reviewed by the Compliance Department. Failure to meet all requirements of these laws and regulations can result in serious consequences for SVMC.

Patient Referrals:

The Stark Law is a strict liability law prohibiting physicians from making referrals of Medicare patients to an entity that furnishes "designated health services" if the physician has a financial relationship with the entity, unless an exception applies. Further, Medicare will not pay for claims improperly referred and the entity has a duty to refund, as well as be liable for Civil Monetary Penalties for knowingly presenting or causing another to present an improper claim, the potential of exclusion and False Claims Act liability. SVMC accepts patient referrals and admissions based solely on the patient's medical needs and our ability to render the needed services.

No SVMC staff member or other person acting on behalf of SVMC is permitted to pay or offer to pay anyone, solicit or receive anything of value, directly or indirectly, in exchange for the referral of patients. Similarly, when making patient referrals to another healthcare provider, we do not take into account the volume or value of referrals that the provider has made to Sierra View.

Business Courtesies/Tokens of Appreciation:

Any entertainment, gift or token of appreciation involving physicians or other persons who are in a position to refer patients to SVMC must be undertaken in accordance with the Non-Monetary Compensation and Medical Staff Incidental Benefits policies. This policy was developed to be in compliance with federal laws, regulations, and rules regarding these practices. Staff must consult

SVMC policies or our Compliance Department prior to extending any business courtesy or token of appreciation to a potential referral source. See SVMC policy: Non-Monetary Compensation and Medical Staff Incidental Benefits

FEDERAL AND STATE FALSE CLAIMS ACTS (FCA):

Federal and State False Claims Acts prohibit any person or entity from, among other things, knowingly presenting, or causing to be presented, a false or fraudulent claim for payment or approval, or knowingly making or using, or causing to be made or used, a false record or statement to get a false or fraudulent claim paid or approved.

The penalties for violating the Federal or State False Claims Act include:

- Civil monetary penalties of up to \$20,000 for each false claim submitted;
- Up to three times the amount of damages the government sustains because of the false claim; and,
- The costs of the legal action brought to recover for the false claim.

A private citizen may file suit under the Federal and State False Claims Acts on behalf of the government if the citizen has direct and independent knowledge of the submission of a false claim. The government will then decide whether to intervene and take over the case, dismiss or settle the case, or let the private individual pursue the case on his or her own. In either case, the person who initially filed the case may receive a portion of the amount recovered in either litigation or settlement of the claim.

WHISTLEBLOWER PROTECTIONS:

Both the Federal and State False Claims Acts prohibit employers from retaliating or discriminating against an employee who, acting in good faith, investigates, reports or assists in uncovering a false claim or statement.

An employee who suffers discrimination or retaliation based on protected activities has the right to sue under the both the Federal and State False Claims Act. If the employee can prove that his or her employer retaliated against him or her for engaging in protected activity, the employee is entitled to be “made whole.” The remedies may include:

- Reinstatement of the employee to his or her position;
- Two times the amount of back pay;
- Interest on the back pay; and,
- Compensation for any special damages (including litigation costs and reasonable attorneys’ fees).

As noted above, it is the policy of Sierra View Medical Center that no employee shall be punished solely on the basis that he or she reported what he or she reasonably believed to be an act of wrongdoing or a violation of the SVMC Compliance Program.

Please see the *False Claims And Whistleblower Protection* policy.

BUSINESS AND FINANCIAL INFORMATION:

Accuracy, Retention, and Disposal of Documents and Records:

SVMC is committed to keeping accurate and complete records in accordance with applicable federal and state laws and regulations and SVMC policies and procedures.

Each SVMC staff member is responsible for the integrity and accuracy of our organization's documents and records, not only to comply with regulatory and legal requirements, but also to ensure that records are available to support SVMC's business practices and actions. No one may alter or falsify information on any record or document. Records must never be destroyed in an effort to deny governmental authorities information that may be relevant to a government investigation.

Medical and business documents and records are retained in accordance with the law and SVMC record retention policy. Medical and business documents include paper documents such as letters and memos, computer-based information such as e-mail or computer files on disk or tape, and any other medium that contains information about the organization or its business activities. It is important to retain and destroy records only according with our policy. SVMC Staff must not tamper with records. No one may remove or destroy records prior to the specified date without first obtaining permission as outlined in the SVMC records management policy.

To ensure the integrity of its records, SVMC shall maintain a comprehensive document system with policies and procedures covering the following with respect to all documents including information maintained in computer files: (a) creation, (b) distribution, (c) retention, (d) storage and retrieval, and (e) destruction.

Please refer to the *Records Management* policy in the policy library for additional details.

Coding and Billing for Services:

SVMC communicates its billing policies to all of its patients prior to, or, at the time of service or admission. SVMC bills its patients for services rendered and provides itemized bills free of charge upon request. The patient financial services office responds to patient questions in a timely and courteous manner. Adjustments are made to correct any over or under billings.

SVMC has implemented policies, procedures and systems to facilitate accurate billing to government payers, commercial insurance payers, and patients. These policies, procedures, and systems conform to pertinent federal and state laws and regulations. SVMC prohibits any SVMC Staff member from knowingly presenting or causing to be presented claims for payment or approval that are false, fictitious, or fraudulent.

In support of accurate billing, medical records must provide reliable documentation of the services SVMC provided. It is important that all individuals who contribute to the medical record provide accurate information and do not destroy any information considered part of the official medical record. Accurate and timely documentation also depends on the diligence and attention of Medical

Staff members who treat patients in our facilities. Medical Staff Members are expected to provide SVMC with complete and accurate information in a timely manner.

Confidential Information:

You are prohibited from using any information about SVMC for your personal benefit. Business information should be disclosed only as required in the performance of your job duties or as authorized by SVMC management. Employees may be held personally liable for any benefit gained from improper use of this information or damages resulting from its disclosure. Employees who violate this policy may also face disciplinary action, up to and including termination.

All SVMC communication systems, including phone systems, voice mail, portable electronic devices, Internet and Intranet access and e-mail, are company property and are to be used for business purposes. Reasonable and limited personal use of these resources is permitted; however, these communications may be monitored. You should assume that your personal communications on company-owned or maintained systems are not private. Patient and confidential information should not be sent through any communication system unless it is sent through a secure system which complies with HIPAA. Anyone who abuses SVMC information systems or uses them excessively for non-business purposes will be subject to discipline.

You are all responsible for using company resources and assets wisely, including time, materials, equipment, supplies and information. These resources are to be maintained and used for business purposes only. The occasional use of items that are negligible in cost, such as telephones and insignificant copying, is permitted. The use of company assets for personal financial gain unrelated to the organization is not allowed. All employees must obtain prior written approval from their supervisor to use company assets for charitable reasons.

Please see: Email policy; Information Security Audit and Incident Reporting policy; Workstation Use and Security and Internet policy located in the policy library.

Q&A Computer Security

QUESTION: I am out of town and need confidential information from my office computer. I call the office and ask my assistant to get the information for me. To do so, I must tell him my computer security password. Have I violated SVMC policy?

ANSWER: Yes. You may forward emails to your assistant or other designee to be read while you are away, but it is a violation of IT Security policies to disclose computer passwords. You are responsible for protecting your password, and for the use or misuse of the same.

Charity Care:

SVMC is a non-profit organization, which provides hospital services to the community of Porterville and the greater area of Southeastern Tulare County. SVMC is committed to meeting the health care needs of all patients in the community, including those who may be uninsured or

underinsured. As part of fulfilling this commitment, SVMC provides medically necessary services, without cost or at a reduced cost, to patients who qualify in accordance with program requirements.. Please see the Financial Assistance – Full Charity Care and Partial Discount policy

Conflict of Interest:

A conflict of interest is any situation in which financial or other personal considerations may compromise or appear to compromise your integrity in business judgment, delivery of patient care, or ability to perform your job or responsibilities. A conflict of interest may arise if you engage in any activities to advance your personal interests at the expense of SVMC.

An actual or potential conflict of interest occurs when any person in a position to influence a decision which could result in personal gain for that individual, a relative or a friend as a result of the SVMC’s business dealings. A relative is any person who is related by blood or marriage, or whose relationship with the person is similar to that of persons who are related by blood or marriage, including a domestic partner, and any person residing in the person’s household. You have a duty to disclose to their supervisor and the Compliance Officer if you believe that you have a financial interest which could put you in a conflict of interest situation.

Political Activity: SVMC and its employees are prohibited from expending public funds to promote a candidate in an election campaign. This means no SVMC employee shall partake in any form of support for a political candidate while on company time. Such an infraction could jeopardize SVMC’s status as a not-for profit entity. Nor are employees permitted to endorse any candidate or political entity as a representative of SVMC. Such an infraction could jeopardize SVMC’s status as a not-for-profit entity. Please see *Compliance - Conflict of Interest policy in the policy library for more information.*

Q&A Political Contributions or Activities

QUESTION: I work for the committee to re-elect a local political candidate. Can I distribute campaign brochures to other SVMC employees? Can I wear a candidate button?

ANSWER: No. You may not distribute campaign material on SVMC property, or otherwise campaign for the candidate while on duty. You are, however, free to distribute this material after hours in non-work areas and off campus

Gifts and Business Courtesies:

SVMC mandates limitations and conditions concerning the exchange of gifts and business courtesies from outside sources to SVMC employees and associates. It is not permitted to accept any amount of cash or cash equivalent (check, money order, credit card, or gift card/gift certificate during the course of your duties as an agent, employee, volunteer or contractor of SVMC, from

any person or entity. Acceptance of gifts (tangible items) or favors during the course of your duties from any person or entity, with a value in excess of \$50.00, is not permitted.

Patients may donate to the Sierra View Foundation or other charitable organization in the name of the SVMC employee or employees they wish to recognize

Promotional items from vendors may be accepted as long as they are nominal in value (\$10.00 or less). Promotional items include, but are not limited to pens, notepads, mugs, binders or similar items which are pre-printed or embossed with the logo of a vendor or product name. Any gifts that are embossed or preprinted with the logo of a vendor or product name that exceed the \$10.00 value are unacceptable even if they do not reach the \$50.00 limit.

It is the responsibility of the Department leadership to monitor the value of all gifts received, and to contact the Compliance Department should there be a question as whether a gift is appropriate or not. Please see policy: *Compliance, Gifts and Business Courtesies, Exchange of*

Q&A Accepting Gifts

QUESTION: I work on a unit in the hospital. Upon being discharged, a grateful patient offered me \$20 in cash to thank me for the care they received. May I keep the cash?

ANSWER: No. You may not accept any amount of money in the form of cash, check, or pre-paid credit card from anyone in relation to your position or job performance at SVMC.

Outside Employment and Business Interests:

SVMC recognizes that some employees may hold additional jobs outside their employment with SVMC. In accordance with California Government Code section 1126, employees of SVMC are permitted to engage in outside work or hold other jobs to certain restrictions based on reasonable business concerns. **EXEMPT EMPLOYEES ONLY:** Outside employment for exempt employees requires prior written approval from your respective vice-president.

You are not permitted to work on any personal business venture on the SVMC premises or while working on SVMC time. In addition, employees are not permitted to use SVMC equipment, telephones, computers, materials, resources or proprietary information for any outside work. You must abstain from any decision or discussion affecting SVMC when serving as a member of an outside organization or board or in public office, except when specific permission to participate has been granted by the SVMC's Compliance Officer. Please see: *Outside Employment policy* in the policy library for more information.

Contracting with SVMC:

You may not contract with SVMC to be a supplier, to represent a supplier to SVMC, or to work for a supplier to SVMC while you are an employee of SVMC. In addition, you may not accept money or benefits, of any kind, for any advice or services you may provide to a supplier in connection with its business with SVMC. Please see *Compliance - Conflict of Interest* policy in the policy library for more information.

Government Investigations:

It is SVMC's policy to comply fully with all state and federal laws and regulations. SVMC will cooperate with any reasonable request for information from any governmental entity. In doing so, however, it is essential that our employees' legal rights and the legal rights of the company are protected. It is also important that government requests for information be responded to in an accurate, complete and timely manner. Notify your supervisor, Vice-President and/or Compliance Officer immediately if you receive a subpoena, search warrant or other legal document from a government agency regarding SVMC's business, whether at home or in the workplace.

SVMC encourages employees to cooperate with governmental authorities conducting an investigation; no adverse action will be taken against you for any lawful cooperation. Be aware that the law guarantees each person the right to be represented by legal counsel during any investigation or inquiry by any governmental agency. In such a scenario, SVMC will likely also be represented, and you should be aware of the opportunity for such representation. You are not legally required to notify SVMC of your cooperation with governmental authorities in an investigation; however, we would appreciate such notification.

For more information on government search warrants or unannounced visits by auditors/ investigators, please refer to the *Government Search Warrants* and Unannounced Visits policies located in the policy library.

Exclusion List:

SVMC will not employ or conduct business with an individual or entity listed on a government exclusion list. Medical treatment provided to government insured patients (Medicare, Medicaid, TRICARE, etc.) cannot legally be billed for reimbursement if a person or entity on an exclusion list had any part in the care of that patient, whether direct or indirect, including the provision of equipment or supplies involved in the patient's treatment. Nor can an excluded person or entity have any part in the billing process for the care of a government insured patient. In addition, any service ordered or directed by an excluded physician is excluded from coverage under the Federal healthcare programs. For a hospital violating this law (by knowingly or in some cases even unknowingly employing or doing business with a person or entity on an exclusion list), penalties can be severe. By signing the attestation, you agree that you will immediately self-report to management and the Compliance Officer if you receive notification of being excluded from participation in federal and/or state health care programs, including Medicare and MediCal or any government reimbursement program.

Please see *Compliance - Sanctions Screening* policy in the policy library.

