



Adventist HealthCare

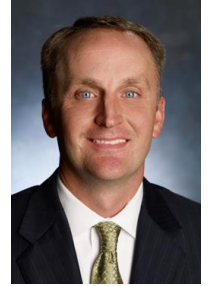
Organizational Integrity Program Handbook For Medical Staff



Updated: September 3, 2014

Electronic Copy Available on AHC's OIP Web Site

**IMPORTANT MESSAGE FROM THE CHIEF EXECUTIVE OFFICER OF
ADVENTIST HEALTHCARE**



The mission of Adventist HealthCare, (“AHC”) is to deliver clinical and service excellence through a ministry of physical, mental and spiritual healing. We accomplish this mission by living our five core values of respect, integrity, service, excellence and stewardship. We have remained true to our mission and values for many years and will continue to do so. Consistent with this mission, AHC is committed to ethical business practices and compliance with applicable federal and state laws and regulations. As such, we have adopted an Organizational Integrity Program (“OIP”) to help us meet our ethical and legal obligations.

The AHC Code of Conduct, along with various other policies & procedures, form the basis of our system-wide Integrity Program. The Code of Conduct is designed to reinforce our understanding of the OIP, and to assist us in navigating the various compliance obligations of the highly regulated health care industry in which we do business.

Each member of the Medical Staff will be furnished with a copy of the Organizational Integrity Program Handbook, which contains our Code of Conduct along with a summary of the essential elements of the OIP. Members of the Medical Staff must review and become familiar with the requirements of the OIP, and sign the form attached to the Handbook acknowledging that you have read and understand the Code of Conduct. This is important because adherence to the Code of Conduct is mandatory and a condition of your Medical Staff privileges. Indeed, the Code of Conduct applies to everyone, including board members, officers, directors, managers, contractors, employees, as well as all Medical Staff. By adhering to the standards and principles summarized in this Handbook, you enable AHC to continue to fulfill its mission of delivering clinical and service excellence to our customers in a legal and ethical fashion.

In regards to the structure of the OIP, Susan Glover has been appointed as Senior Vice President, Chief Quality & Integrity Officer, and will be in charge of AHC’s regulatory compliance efforts. In addition, a system-wide Organizational Integrity Committee has been established which includes members of AHC’s Senior Leadership Team, as well as Local Integrity Officers from each of AHC’s entities. Ms. Glover and your Local Integrity Officer will be a valuable resource with respect to compliance matters, and will be available to address any questions you have about the OIP.

I am very excited about our Organizational Integrity Program and look forward to working with each of you on this critical area. Please join me in reaffirming AHC’s ongoing commitment to organizational integrity. And remember, integrity is all about:

Knowing the Right Thing to Do and Doing the Right Thing

Terry Forde
President and CEO

ADVENTIST HEALTHCARE'S
CODE OF CONDUCT

Our Mission is to deliver clinical and service excellence through a ministry of physical, mental and spiritual healing.

Integrity...

We are above reproach in everything we do.

1. Adventist HealthCare (“AHC”) and its employees, contractors, vendors, physicians, volunteers, board members, and business associates (“AHC Members”) are committed to full compliance with the letter and spirit of the laws which govern our business, including those that apply to federal health care programs.
2. We are committed to adhere to a Code of Conduct and a comprehensive Organizational Integrity Program (“OIP”) to guide our actions.
3. We will represent ourselves, our capabilities, and our licenses and accreditations fairly and accurately in our marketing promotions and communication with others.
4. We will carefully evaluate potential partnerships and associations with other healthcare providers, educational organizations and payers according to the following criteria: compatibility of mission and values, vendors, and ability to serve the community.
5. We will closely monitor, identify, and take any necessary action concerning possible potential conflicts of interest regarding members of our governing board and administration relative to other organizations.
6. We will provide services only to patients for whom we can safely provide care and will not turn away any patient requiring emergency care.
7. We will treat our customers with the dignity and respect that is inherently theirs by:
 - protecting their privacy and right to confidentiality
 - providing them with timely, accurate information about their diagnosis, treatment and prognosis
 - involving them in every way possible with their care, treatment, transfer, and discharge plans
 - disclosing our ownership of any entity to which they are transferred.
8. We will follow uniform standards of care based on the needs of each patient regardless of race, religion, cultural background, sexual orientation, or ability to pay. A patient's clinical readiness for discharge will always take precedence over payer requirements in decisions of discharge.

9. We will bill customers and third-party payers only for services that are rendered, appropriately documented, and properly payable. Billing and coding rules are often complex, but AHC will take appropriate steps to understand and adhere to those rules. If a billing question arises, we will provide billing information in a quick, courteous manner by a thorough review of all appropriate care documentation. We will empower staff to make decisions that are mutually satisfactory to customers, payers, and the organization.
10. Upon discovering a billing error or receiving an overpayment, we will promptly repay any funds to which we are not legally entitled to the appropriate third-party payer.
11. We will educate and train all AHC Members and contractors involved in billing, coding and patient care on the obligations of their position, including training regarding applicable AHC policies, OIP requirements and expectations, and consequences of a failure to so comply.
12. Using the Mission Statement as our standard, we will treat all AHC Members as valued fellow team members. We will ensure they are fairly compensated and are provided with a clean, safe, worker-friendly environment.
13. We will actively demonstrate the following five values (“RISES”):
 - **RESPECT:** We recognize the infinite worth of the individual and care for each one as a whole person.
 - **INTEGRITY:** We are above reproach in everything we do.
 - **SERVICE:** We provide compassionate and attentive care in a manner that inspires confidence.
 - **EXCELLENCE:** We provide world class clinical outcomes in an environment that is safe for both our patients and caregivers.
 - **STEWARDSHIP:** We take personal responsibility for the efficient and effective accomplishment of our mission.
14. Before acting, all AHC Members should ask themselves -- Is it the right thing to do? Is it ethical? Is it legal? Does it follow AHC's Code of Conduct and OIP policies?
15. Our AHC Members will have several avenues to report suspected compliance violations, including an anonymous reporting method. An AHC Member may report issues to his or her immediate supervisor, senior management, the LIO, or the AHC System Integrity Officer. AHC Members may also report anonymously via the Integrity Hotline.
16. Our AHC Members have an affirmative duty to report violations of the Code of Conduct and will not face retaliation for reporting their concerns in good faith.
17. Our AHC Members will ask questions if they are unsure of what the right thing to do is.
18. Information regarding reports of suspected compliance or legal violations will be treated in an appropriately confidential manner.
19. All reports of suspected compliance or legal violations will receive a prompt and appropriate review.

20. We adhere to a policy of appropriate corrective actions for compliance violations and consistent discipline to assure fairness and equity in treatment for each violation.
21. Adherence to the Code of Conduct is required of everyone involved with AHC, including board members, officers, directors, managers, contractors, medical staff, and all AHC Members. Abiding by the OIP and Code of Conduct is mandatory and a condition of employment (or doing business) with AHC.
22. Adherence to the OIP and the Code of Conduct will be a factor in evaluating all AHC Members.
23. All AHC Members, including AHC managers and supervisors, will follow the ethical standards dictated by their respective professional organizations.
24. We take very seriously all violations of criminal, civil or administrative laws, such as those governing billing for services, business relationships with referral sources, and quality of care. Such violations may have profound effects on our organization, our patients and government programs, and may result in significant sanctions and penalties.
25. We are committed to monitoring and auditing our operations to detect and prevent possible non-compliance with laws and its OIP policies and procedures.
26. As appropriate, we will report identified violations of the law to the appropriate government contractor or agency.
27. We will respect each of our customers, including our patients, their families, business partners, physicians and insurance programs, by engaging in only honest, courteous and forthright behavior.
28. **How to report a suspected compliance or legal violation:**
Failure to report a known compliance violation may harm AHC, its patients, insurance companies, and government programs; therefore, AHC Members have an affirmative duty to report suspected integrity or legal violations by following AHC's Reporting Process. An AHC Member may report integrity violations directly to his or her supervisor, or to a Human Resources representative; the AHC Member may also report violations to the Entity LIO or AHC System Integrity Officer. Finally, AHC Members may report their concerns anonymously by calling the Integrity Hotline (toll free **1-800-814-1434**) or by filing a report on the OIP website or on RL Solutions, AHC's incident reporting system. AHC strictly prohibits retaliation for good faith reporting of actual or possible violations of the Code of Conduct, laws, or AHC's Policies & Procedures. If you have any questions about the Code of Conduct or the OIP, please contact your LIO or AHC's System Integrity Officer.

AN OVERVIEW OF THE FEDERAL FALSE CLAIMS ACT

The Deficit Reduction Act of 2005 requires healthcare organizations receiving \$5 million or more in Medicaid payments to educate their employees about the federal False Claims Act. To meet this requirement, and in furtherance of our Mission & Values, an overview of the False Claims Act is provided below, along with a summary qui tam or “whistleblower” protections, as well as a description of Adventist HealthCare’s policies & procedures for detecting and preventing fraud, waste, and abuse.

The False Claims Act

The False Claims Act (“FCA”) is a federal statute that applies to fraud involving any federal health program, such as Medicare or Medicaid.

The FCA imposes civil penalties for knowingly making or causing to be made a false claim, record or statement for payment by a federal program. These penalties include fines of \$5,500-11,000 per claim, plus treble damages. Also, healthcare provider can be excluded from participation in federal healthcare programs, such as Medicare or Medicaid.

Qui Tam or “Whistleblower” Protections

The FCA allows private individuals to file a qui tam lawsuit on behalf of the United States government against a person or entity that has committed fraud. Under the FCA, a whistleblower may receive 15 to 30 percent of the government's recovery attributed to the fraudulent practice. In addition, the FCA protects whistleblowers from retaliation by their employer. This means that employees who are fired, demoted, or harassed for whistleblowing may recover damages such as reinstatement of employment, back pay, and legal fees.

Adventist HealthCare Policies & Procedures

This OIP Handbook contains Adventist HealthCare’s Code of Conduct and a detailed description of Adventist HealthCare’s OIP policies and procedures; but first and foremost, if you are aware of fraud or unethical conduct, give us a call...we can help!

You can get help with a compliance or ethical concern in any of the following ways:

1. Speak with your Supervisor or a Human Resources representative; or
2. Contact your Local Integrity Officer; or
3. Contact the AHC System Integrity Officer; or
4. [Call the toll-free Integrity Hotline \(1-800-814-1434\).](#)
5. [Report electronically via the OIP website or RL Solutions, AHC’s incident reporting system](#)

Adventist HealthCare has strict policies prohibiting any retaliation against employees for reporting compliance or ethical concerns in good faith. However, you can choose to report anonymously via the Integrity Hotline or RL Solutions.

Knowing the Right Thing to Do and Doing the Right Thing

REPORTING QUALITY & PATIENT SAFETY CONCERNS

The Joint Commission is an organization whose mission is “To continuously improve the safety and quality of care provided to the public through the provision of health care accreditation and related services that support performance improvement in health care organizations.” Any employee who has concerns about the safety or quality of care provided at an AHC Entity that is accredited by the Joint Commission may report these concerns to the Joint Commission. The Joint Commission’s contact information can be found at www.jointcommission.org or you can contact the Joint Commission toll-free at 1-800-994-6610. Further, AHC and its Entities will take no disciplinary action because an employee reports safety or quality of care concerns to the Joint Commission.

Should you have any questions, please feel free to contact your Local Integrity Officer, **call the toll-free Integrity Hotline (1-800-814-1434)**, or submit a report electronically via the OIP Web Site or RL Solutions, AHC’s incident reporting system

IDENTITY THEFT PROTECTION PROGRAM

Each year, millions of Americans have their identities stolen. The list of criminal uses for this stolen information is as endless as the damage done to the victim. Identity thieves may use the victims’ information to steal money from bank accounts, apply for fraudulent credit cards, and even sell the victims information to other criminals. Indeed, identity theft has become the crime of the 21st Century.

To protect the public from identity theft, the Federal Trade Commission (FTC) issued the “Red Flags” regulation, which requires organizations to implement an Identity Theft Protection Program to prevent, detect, and mitigate obvious instances (i.e., “red flags”) of identity theft.

Adventist HealthCare’s Identity Theft Protection Program is designed to help Adventist HealthCare employees and physicians detect and report suspected identity theft so any impact to the patient can be mitigated, and process improvements implemented to prevent future occurrences of identity theft.

Employees should be on the look-out for “red flags,” which are suspicious activities, patterns, or “warning signs” that indicate an identity theft has occurred. Below are examples of red flags:

- ✓ Address or name discrepancies;
- ✓ Information presented by individual does not match information on file;
- ✓ Suspicious documents presented;
- ✓ Complaint from a patient or law enforcement;
- ✓ Photo ID that does not match the patient;
- ✓ Social security number is different than one used on a previous visit; and
- ✓ Family or friends call the patient by a name different than what was provided by the patient at registration.

Employee's who believe identity theft has occurred should immediately contact their Supervisor and the Entity Chief Privacy Officer. Employees may also report identity theft by calling the toll-free **Integrity Hotline at 1-800-814-1434**.

For more information, see the **Identity Theft Protection Handbook** on the OIP Web Site.



**MEDICAL STAFF ACKNOWLEDGEMENT
OF THE
CODE OF CONDUCT AND ORGANIZATIONAL INTEGRITY PROGRAM**

By signing this acknowledgement form, I attest to having received the Adventist HealthCare Organizational Integrity Program Handbook and the Code of Conduct.

Also, I attest that I have not been convicted of, or charged with, a criminal offence related to health care, nor have I been listed by a state or federal agency as debarred, excluded or otherwise ineligible for participation in state or federally funded health care programs.

I understand that any violation of the Organizational Integrity Program, the Code of Conduct, or any other integrity policy or procedure may be grounds for disciplinary action, up to and including termination of contract or medical staff privileges. If I become aware of any potential violation, I will promptly report it to management or to a Local Integrity Officer.

I accept that the requirements of the Organizational Integrity Program go into effect when I sign this Medical Staff Acknowledgement.

This Medical Staff Acknowledgement is a copy for you to keep for your records. Please sign the Medical Staff Acknowledgement on page 11 of this booklet. The signed form will be retained by the Credentialing Department for record keeping.

Computer Security Agreement

Effective Date: 09/03 New
Cross Referenced:
Reviewed: OIC
Revised: 9/05

Policy No: AHC 6.1.1
Origin: IT
Authority: EC
Page: 1 of 1

This agreement was developed to protect you and your information needs. Please read it carefully so you understand the responsibilities that come with the right of access to the Adventist HealthCare's ("AHC") computing environment.

"Confidential Information" includes information relating to:

- A. Any individuals' **Protected Health Information (PHI)**, which is information that identifies an individual (name, social security number, account number, etc.) and is created or received by a health care provider (like AHC), health plan, employer or healthcare clearinghouse, is transmitted or maintained in any medium (i.e. electronic medical record, paper, oral), and relates to the past, present or future physical or mental health condition, or payment for the provision of care (including medical records, conversions, admitting information, and patient financial information);
- B. Employees (including medical records, compensation, benefits, employment records, and disciplinary actions);
- C. Adventist HealthCare Inc. information (including financial and statistical records, strategic plans, internal reports, memos, contracts, peer review information, communications, proprietary computer programs and technology and source code): and
- D. Proprietary third-party information (including computer programs and technology, client or vendor information and source code).

I, the undersigned, acknowledge the establishment of my computer password and understand that:

- I may learn of or have access to Confidential Information through Adventist HealthCare's computer systems (including, but not limited to patient care information systems, other clinical and financial information systems, the longitudinal patient record, and the actuarial and claims systems).
- I will protect the confidentiality of all information in Adventist HealthCare Information Systems Network.
- My password is for my exclusive use and is the equivalent of my signature; I will not disclose this sign-on information to anyone.
- I will not attempt to learn another user's password.
- I will not attempt to access nor input any information via the computer system other than what pertains directly to my position and/or job description, or what has been assigned to me by my superiors.
- Adventist HealthCare may routinely monitor and audit access to information regarding, but not limited to, employees and patients, their relatives, public figures, and VIPs for appropriateness of access to such information as it relates to my legitimate duties.
- If I have reason to believe that the confidentiality of my password has been broken, I will re-establish a new password for myself, and notify my supervisor of such a breach.
- I will sign off the computer when I leave the computer system.
- E-Mail system will be used in ways consistent with the E-Mail, Internet Use and Standards policy.
- I understand that if I violate any of the above statements, I will be subject to disciplinary action up to and including termination.
- I understand that violation of my duties as discussed above may independently constitute a violation of applicable criminal/civil laws.
- I have received training and understand concepts regarding confidentiality, privacy and security as they relate to the Health Insurance Portability and Accountability Act (HIPAA), and was given the opportunity to ask questions.
- I understand that my password will be deleted from the Adventist HealthCare's computing environment at the time that I terminate my employment from any facility associated with the Adventist HealthCare system or after 6 months of inactivity. Should I be re-employed at any of the facilities, I will be required to establish a new password.
- I further understand that extracting electronic ePHI ("ePHI") data in any form by any means (including but not limited to paper, CDs, floppy disk, jump drives, PDAs, e-mail attachments, picture phones, scanning) and removing from AHC and/or its Entities premises, requires approval from the Department Manager, Director, or the HIPAA Chief Privacy Officer.

This Computer Security Agreement is a copy for your records. Please sign the Computer Security Agreement on page 12 of this booklet. The signed form will be retained by the Credentialing Department for record keeping.

Adventist HealthCare Inc.

SOFTWARE CODE OF ETHICS

This software code of ethics states the policy concerning software duplication for Adventist HealthCare and all of its entities (hereafter referred to as AHC). All employees and medical staff will use software only in accordance with its license agreement. Unless otherwise provided in the license, any duplication of copyrighted software, except for backup and archival purposes, is a violation of the law. Any unauthorized duplication of copyrighted computer software violates the law and is contrary to AHC's standards of conduct. The following points are to be followed to comply with software license agreements:

1. Use of all software will be in accordance with license agreements.
2. Legitimate software will promptly be provided to all employees who need it (and may be provided to medical staff at the discretion of AHC if allowable under the law). No employee or medical staff member will make any unauthorized copies of any software under any circumstances. Anyone found copying software other than for backup purposes is subject to disciplinary action up to and including termination of employment, contractual relationship, or medical staff privileges.
3. Use of any unauthorized copies of software within AHC will not be tolerated. Any person illegally reproducing software can be subject to civil and criminal penalties including fines and imprisonment. AHC does not condone illegal copying of software under any circumstances and anyone who makes, uses, or otherwise acquires unauthorized software will be appropriately disciplined.
4. No employee or member of medical staff will give software to any outsiders including clients, customers and others.
5. Any employee or member of medical staff who determines that there may be a misuse of software within AHC will notify their area manager, director or AHC legal counsel.
6. All software used by AHC on company computers will be properly purchased through appropriate procedures.
7. I have read Adventist HealthCare code of ethics. I am fully aware of the software policies and agree to abide by those policies.

This Software Code of Ethics is a copy for your records. Please sign the Software Code of Ethics on page 13 of this booklet. The signed form will be retained by the Credentialing Department for record keeping.



Adventist HealthCare

MEDICAL STAFF ACKNOWLEDGEMENT OF THE CODE OF CONDUCT AND ORGANIZATIONAL INTEGRITY PROGRAM

By signing this acknowledgement form, I attest to having received the Adventist HealthCare Organizational Integrity Program Handbook and the Code of Conduct.

Also, I attest that I have not been convicted of, or charged with, a criminal offence related to health care, nor have I been listed by a state or federal agency as debarred, excluded or otherwise ineligible for participation in state or federally funded health care programs.

I understand that any violation of the Organizational Integrity Program, the Code of Conduct, or any other integrity policy or procedure may be grounds for disciplinary action, up to and including termination of contract or medical staff privileges. If I become aware of any potential violation, I will promptly report it to management or to a Local Integrity Officer.

I accept that the requirements of the Organizational Integrity Program go into effect when I sign this Medical Staff Acknowledgement.

Name (Printed): _____ Dept: _____ UPIN or NPI No. _____

Signature: _____ Date: _____

This form will be collected and retained by the Credentialing Department for record keeping.
Thank you.

Adventist HealthCare, Inc.
CORPORATE POLICY MANUAL
Computer Security Agreement

Effective Date: 09/03 New
Cross Referenced:
Reviewed: OIC
Revised: 9/05

Policy No: AHC 6.1.1
Origin: IT
Authority: EC
Page: 1 of 1

This agreement was developed to protect you and your information needs. Please read it carefully so you understand the responsibilities that come with the right of access to the Adventist HealthCare's ("AHC") computing environment.

"Confidential Information" includes information relating to:

- A. Any individuals' Protected Health Information (PHI), which is information that identifies an individual (name, social security number, account number, etc.) and is created or received by a health care provider (like AHC), health plan, employer or healthcare clearinghouse, is transmitted or maintained in any medium (i.e. electronic medical record, paper, oral), and relates to the past, present or future physical or mental health condition, or payment for the provision of care (including medical records, conversions, admitting information, and patient financial information);
- B. Employees (including medical records, compensation, benefits, employment records, and disciplinary actions);
- C. Adventist HealthCare Inc. information (including financial and statistical records, strategic plans, internal reports, memos, contracts, peer review information, communications, proprietary computer programs and technology and source code): and
- D. Proprietary third-party information (including computer programs and technology, client or vendor information and source code).

I, the undersigned, acknowledge the establishment of my computer password and understand that:

- I may learn of or have access to Confidential Information through Adventist HealthCare's computer systems (including, but not limited to patient care information systems, other clinical and financial information systems, the longitudinal patient record, and the actuarial and claims systems).
- I will protect the confidentiality of all information in Adventist HealthCare Information Systems Network.
- My password is for my exclusive use and is the equivalent of my signature; I will not disclose this sign-on information to anyone.
- I will not attempt to learn another user's password.
- I will not attempt to access nor input any information via the computer system other than what pertains directly to my position and/or job description, or what has been assigned to me by my superiors.
- Adventist HealthCare may routinely monitor and audit access to information regarding, but not limited to, employees and patients, their relatives, public figures, and VIPs for appropriateness of access to such information as it relates to my legitimate duties.
- If I have reason to believe that the confidentiality of my password has been broken, I will re-establish a new password for myself, and notify my supervisor of such a breach.
- I will sign off the computer when I leave the computer system.
- E-Mail system will be used in ways consistent with the E-Mail, Internet Use and Standards policy.
- I understand that if I violate any of the above statements, I will be subject to disciplinary action up to and including termination.
- I understand that violation of my duties as discussed above may independently constitute a violation of applicable criminal/civil laws.
- I have received training and understand concepts regarding confidentiality, privacy and security as they relate to the Health Insurance Portability and Accountability Act (HIPAA), and was given the opportunity to ask questions.
- I understand that my password will be deleted from the Adventist HealthCare's computing environment at the time that I terminate my employment from any facility associated with the Adventist HealthCare system or after 90-days of inactivity. Should I be re-employed at any of the facilities, I will be required to establish a new password.
- I further understand that extracting electronic PHI ("ePHI") data in any form by any means (including but not limited to paper, CDs, floppy disk, jump drives, PDAs, e-mail attachments, picture phones, scanning) and removing from AHC and/or its Entities premises, requires approval from the Department Manager, Director, or the HIPAA Chief Privacy Officer.

Name (Printed) _____ Department _____ NPI No. _____

Signature _____ Date _____

Adventist HealthCare Inc.

SOFTWARE CODE OF ETHICS

This software code of ethics states the policy concerning software duplication for Adventist HealthCare and all of its entities (hereafter referred to as AHC). All employees and medical staff will use software only in accordance with its license agreement. Unless otherwise provided in the license, any duplication of copyrighted software, except for backup and archival purposes, is a violation of the law. Any unauthorized duplication of copyrighted computer software violates the law and is contrary to AHC's standards of conduct. The following points are to be followed to comply with software license agreements:

1. Use of all software will be in accordance with license agreements.
2. Legitimate software will promptly be provided to all employees who need it (and may be provided to medical staff at the discretion of AHC if allowable under the law). No employee or medical staff member will make any unauthorized copies of any software under any circumstances. Anyone found copying software other than for backup purposes is subject to disciplinary action up to and including termination of employment, contractual relationship, or medical staff privileges.
3. Use of any unauthorized copies of software within AHC will not be tolerated. Any person illegally reproducing software can be subject to civil and criminal penalties including fines and imprisonment. AHC does not condone illegal copying of software under any circumstances and anyone who makes, uses, or otherwise acquires unauthorized software will be appropriately disciplined.
4. No employee or member of medical staff will give software to any outsiders including clients, customers and others.
5. Any employee or member of medical staff who determines that there may be a misuse of software within AHC will notify their area manager, director or AHC legal counsel.
6. All software used by AHC on company computers will be properly purchased through appropriate procedures.
7. I have read Adventist HealthCare code of ethics. I am fully aware of the software policies and agree to abide by those policies.

Name (Printed)

Department

Signature

Date