INTEGRATED HEALTH PARTNERS

CORPORATE

COMPLIANCE PROGRAM

CODE OF CONDUCT:

FEARLESS INTEGRITY AND MENTORING SPIRITS

"If you have integrity, nothing else matters. If you don't have integrity, nothing else matters."
Alan K. Simpson

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Mission

Integrated Health Partners seeks to assure accessible, cost effective, high quality health care for our community – and value for our members.

Vision

Integrated Health Partners strives to build a regional system of high-quality health care through the cooperative efforts of physicians, providers, employers and payers.

Core Values

Integrity, Fearlessness, Innovation, Empowerment, all driven by *Dedication,* and a *Mentoring Spirit*

"Integrity is what we do, what we say, and what we say we do"
Don Galer

A MESSAGE

From Our Leadership

IHP is dedicated to integrity. It underlies every action we take, as individual employees, individual providers, and as an organization as a whole. Compliance with the law and ethical principles is not just "something we have to do." It is an imperative of our organization that we take very seriously. We will ALWAYS conduct our business in accordance with all applicable laws and regulations, as well as within all ethical guidelines. Legal and ethical compliance provides the minimum, absolute, essential condition for performance of all our duties.

Integrity is a key principle for the selection and retention of those individuals and businesses with which we choose to partner. Physicians, facilities, representatives or consultants must certify their willingness to comply with our policies and procedures and will never be retained to circumvent our values and principles. Through an integrated and unique training and education program, IHP communicates its values and ethics to its employees and providers in a variety of ways. Every individual in our organization is expected to demonstrate our culture of integrity to individuals, patients, business associates, or other people with which they interact. Integrity does not stop at our office's doors.

This Code of Conduct provides you with essential guidance on our culture of integrity, and information on how you will be able to become an ambassador of IHP's ethics to the greater community. You are expected not only to adhere to this code, but also embrace it as a foundation for every action you take. IHP employees and providers must be willing to comply with these standards, as well as to ensure that co-workers, business associates, vendors, and others do. Our organization is only as strong as our weakest link. Each of us has a responsibility to be the eyes, ears, heart, and soul of IHP, and therefore must be willing to take an active role in ensuring that our integrity is never compromised.

IHP is a leader and benchmark organization in the health care industry. As such, IHP has never let its small size hinder its ability to innovate and inspire. This is true not only in our business operations, but also in our ethical practices. IHP is dedicated to demonstrating that a compliance program is not just something that health care organizations should develop. Instead, IHP believes that a compliance program is an absolutely essential ingredient for our organization's success. Our employees and providers represent that belief in every action.

Susan Cook
Executive Director

Trust

"The glue that holds all relationships together, including the relationship between the leader and the led, is trust, and trust is based on integrity."
Brian Tracy

WHY THE CODE OF CONDUCT IS IMPORTANT?

Integrated Health Partners, and each of us individually, are held accountable for our behaviors and actions. In addition to supporting our Mission, Vision, and Values, the Code of Conduct also assists in ensuring that our actions and behaviors are consistent with the numerous legal, ethical, and professional obligations that apply to our organization. Actions and behaviors that are inconsistent with the Code of Conduct can significantly harm relationships with patients, communities, business partners, and others we rely upon to assist us in the delivery of quality health care services.

IHP believes strongly in the value of fearlessness. As we strive to innovate health care delivery systems, we do so by embracing what is unknown or unfamiliar. Likewise, Integrated Health Partners embraces new responsibilities in the areas of legal and ethical compliance with the same fearless attitude. No one employee or provider is more responsible than another, and we all must learn, grow and innovate as we apply rigorous standards of conduct to our everyday job responsibilities.

Therefore, every individual will be held accountable for actions and behaviors inconsistent with the Code of Conduct. Violations of the Code could result in disciplinary action, up to and including termination of employment, affiliation, or business relationships, as applicable, in accordance with Integrated Health Partners' policies. We will not compromise our integrity and we will not allow others to do so.

"Each of us has a responsibility to be the eyes, ears, heart, and soul of IHP, and therefore must be willing to take an active role in ensuring that our integrity is never compromised."

OUR RESPONSIBILITIES AS MENTORS

Integrated Health Partners has always been a leader in every action we have undertaken. Likewise, IHP believes that every individual or organization that associates with us is a "leader" as well. The application of our Code of Conduct is no exception as it applies to all employees, contract workers, providers, and business associates equally. Everyone at IHP is held to the highest standard of responsibility. Each individual serves a key role in receiving and responding to questions and concerns raised by others. Your response to questions and concerns is key to others having the trust and confidence in bringing important matters to your attention. As a "leader," you have a responsibility to:

- Review and follow the Code of Conduct, paying attention to those areas that apply to your everyday work activities;
- Ask questions when you're uncertain what to do;
- Speak up when you're concerned about behavior that is inconsistent with the Code of Conduct;
- Serve as a role model for our Mission, Vision and Values by carrying-out your responsibilities with the highest degree of integrity;
- Clearly communicate your expectations for the highest standards of ethical behavior;
- Promote a culture of trust, open communication and respect;
- Hold everyone around you accountable for their behavior;
- Encourage others to raise issues and concerns so they can appropriately be addressed;
- Respond timely and appropriately to issues and concerns when they are brought to your attention;
- Support and reinforce our Values through your daily interactions and decision-making processes;
- Support and promote our policy of non-retaliation against anyone who raises issues and concerns in good faith; and
- Learn and follow applicable laws and regulations that affect your specific area of job responsibilities.

"No one will question your integrity if your integrity is not questionable."
Nathaniel Bronner Jr.

FAQ

FREQUENTLY ASKED QUESTIONS
Re: Our Responsibilities as Mentors

Q: I have an employee who was disciplined for violating one of our policies. The employee was reported by one of his co-workers and he is now treating that co-worker very badly. What should I do?

A: Reporting a policy violation in good faith is a duty of all our employees, as well as our providers and their staff. Retaliating against the person who reports such issues is strictly prohibited. This incident needs to be immediately addressed according to existing human resources procedures in our organization.

Q: One of my employees has reported an issue to me, but he doesn't want to tell me who is involved because he doesn't want the person to get in trouble. What should I do?

A: Promoting a culture of trust is critical to our organization. Thank the employee for bringing the issue to your attention. Let him or her know that you understand and appreciate the concern for his or her co-worker, but that it is important to follow up with the employee involved to address the issue and to prevent it from happening in the future.

Q: I have an employee who has violated the Code of Conduct. He is a really great employee and I'm sure it was all just a misunderstanding. He is very upset, and I don't really want to discipline him. What should I do?

A: Although it is sometimes very difficult, it is important to hold employees accountable for behavior that is not consistent with the Code of Conduct. Re-educating the employee and referring him or her to existing human resources procedures assures consistent accountability standards for everyone.

Q: As a part of my job, I work with physicians on several matters and the issue of patient referrals comes up from time to time. I know there are laws related to this area, but I don't understand them all. What should I do?

A: There are several resources to help you understand the laws impacting physician relationships and compliance policies that promote ethical behavior. Contact the IHP Compliance Officer for further guidance.

THE CODE OF CONDUCT MENTORING SPIRIT AND FEARLESS INTEGRITY

Virtually everything we do at IHP is dependent on nurturing continuing relationships – relationships with our patients and the communities we serve, relationships with co-workers and others who serve with us, and relationships with vendors, business partners, payers and others involved in our organization. Essential to the maintenance of these relationships is the application of a Mentoring Spirit in all our interactions. This spirit allows us to fulfill our Mission and Vision through a continuous approach of teaching, advising, coaching, growing and innovating.

IHP understands that sometimes it is not easy to make the right decision. Often our employees and providers are faced with difficult decisions regarding the care of their patients, the provision of services to the community, and interactions with the government and other health care payers. IHP expects all its affiliates to approach these situations with fearless integrity. IHP believes that if its employees and providers use unwavering ethical standards to make these difficult decisions, the right decision will always be made.

Reverence

"Real integrity is doing the right thing, knowing that nobody's going to know whether you did it or not."
Oprah Winfrey

My Relationships With Patients

Integrated Health Partners seeks to assure accessible, high quality health care for our community. Patients, residents and others who entrust their care to our providers, as well as their families and representatives, are one of our highest priorities.

What is Expected of Me?

Whether you are directly involved in the delivery of care to patients, residents, or others, or in a role that indirectly supports such services, you are expected to:

- Deliver services with compassion, dignity and respect for everyone in your care, including their family members and other representatives;
- Act in the best interests of those in your care;
- Respond to requests for information, input or assistance from patients, family members and other representatives in a timely and supportive manner;
- Deliver services in accordance with all professional standards that apply to your position;
- Involve patients, their family members and representatives in care decision-making when appropriate, and respect patient and family preferences;
- Maintain complete, timely and accurate medical records; and
- Protect the privacy and confidentiality of all medical and other information of those in your care.

Health Insurance Portability and Accountability Act (HIPAA):

HIPAA is a federal law that requires health care providers and other "covered entities" to protect the privacy and security of patient health information, and provides patients certain, specific rights related to their health information. You should be familiar with your organization's policies and procedures to protect the privacy and security of health information. Please contact your designated privacy officer if you have questions or need further guidance related to HIPAA. If your organization has not designated a HIPAA privacy officer, please contact IHP's Compliance Officer.

FAQ

FREQUENTLY ASKED QUESTIONS
Re: Our Responsibilities with Patients

Q: If I see that a patient is not being treated with proper respect and courtesy by another care provider, what should I do?

A: First, ensure that the patient is not in harm's way. Then, talk with your manager. If your manager does not provide a satisfactory response, contact your Compliance Officer or one of IHP's Compliance Officers.

Q: I recently had a patient tell me that he does not want to receive any more treatment and just wants to be made comfortable and allowed to die. The patient does not think the physician is listening to him. What do I say to the patient?

A: Part of patient-centered care is listening to what the patient wants – even if the patient's decision conflicts with your personal values. You should inform the patient's care team of the patient's request and work with the patient's family to meet his needs and wishes. It is important that the patient be presented with appropriate options to ensure the decision is an informed one.

Q: I work in a hospital and have access to the patient registration system. Recently a friend of mine was seen in the emergency room and admitted to the hospital. Can I log into the system and see how she is doing, or at least locate her room number?

A: Since you are not involved in your friend's care, you must not access her medical information or location. You may only access this type of information if you need it to do your job.

"Ethics is nothing else than reverence for life."
Albert Schweitzer

My Relationships With Fellow Employees

In order to build a clinically integrated network of high-quality health care through the cooperative efforts of physicians, providers, employers and payers, IHP must provide work environments that allow employees to trust and rely on each other, in a mentoring way. Trust and respect are important factors toward ensuring that all team members utilize their talents, perspectives and ideas to the best of their abilities. At Integrated Health Partners, everyone is expected to treat others as they would like to be treated and always approach every working relationship with honesty, respect and appreciation for others.

What is Expected of Me?

Whether an employee, contract worker, provider staff member, vendor, or other business associate of Integrated Health Partners, you are expected to:

- Treat others with honesty, dignity, fairness and respect;
- Maintain a positive and courteous attitude and approach;
- Speak kindly and patiently to your co-workers and others who work with you;
- Commit to working with others in a supportive, team environment;
- Support co-workers in providing excellent customer service by responding to requests for information, input or assistance in a timely manner;
- Seek clarity, if needed and notify your manager if you are not able to meet agreed upon due dates;
- Communicate with others in a clear, open and honest manner;
- Attempt to address any differences you have with co-workers directly with the individuals involved;
- Respect the diversity of others, including racial, ethnic, gender, religious and other differences;
- Abstain from physical contact with co-workers;
- Report harassment, intimidation or violence of any kind that you witness in the workplace; and
- Respect the individual privacy of co-workers and others.

Respect

FAQ

FREQUENTLY ASKED QUESTIONS
Re: Our Responsibilities to Co-Workers

Q: I overheard a co-worker making racially offensive jokes with other co-workers. What should I do?

A: This type of behavior is unacceptable. First, address the co-worker kindly, patiently, and respectfully. Second, contact your manager to report the matter. If you are not satisfied with the response, or if you feel you cannot approach your manager on the issue, contact a higher-level manager, a human resource representative, the IHP Compliance Officer, or submit a report to the anonymous IHP Compliance Reporting System.

Q: I have noticed that a male co-worker has been very "friendly" with his female co-workers. There's a lot of touching and extremely personal comments even when other people are in the room. I don't think this is appropriate. What should I do?

A: This is a matter that must be addressed according to existing procedures such as IHP's Respectful Workplace policy. First, share your concerns with the male co-worker and second, notify your manager of the issue. If you are not satisfied with your manager's response, or if you aren't comfortable approaching your manager on such an issue, discuss your concern with a human resources representative, contact the IHP Compliance Officer, or submit a report to the anonymous IHP Compliance Reporting System.

Q: Yesterday I saw a manager berate an employee in the presence of other employees. I was very bothered by the manager's behavior and felt terrible for the employee. Is there anything I can do?

A: IHP is committed to a Respectful Work Environment. Behavior that is rude, embarrassing, threatening, berating, belittling or intimidating, including the use of profane or abusive language, is not appropriate under any circumstances. There are several options to report such behavior, including your manager, Human Resources, or the IHP Compliance Officer.

"Subtlety may deceive you; integrity never will."
Oliver Goldsmith

Respectful Work Environment:

Integrated Health Partners is committed to creating and maintaining a respectful work environment for all employees and we expect our providers to do the same. As a part of our organization, you should always expect to be treated with respect. We also expect that you will always treat everyone you encounter with equal respect and fairness. IHP will not tolerate offensive behavior, or behavior that could be construed as offensive, based on race, religion, color, sex, age, national origin, disability, height, weight, marital status, veteran status, sexual orientation, or membership in any other protected classification defined under applicable state, federal or local law. It is irrelevant whether the offensive behavior occurred on our premises or so long as the behavior occurred in the scope of an employment or contractual relationship with IHP.

Offensive Behavior is defined as non-work-related conduct or comments related to race, religion, color, sex, age, national origin, disability, height, weight, marital status, veteran status, sexual orientation, or membership in any protected classification, whether welcome or unwelcome.

- Offensive behavior includes behavior not consistent with respectful behavior, as defined above.
- Offensive behavior includes a wide range of conduct including slurs, graffiti, sexual advances or propositions, requests for sexual favors, jokes or banter related to protected status, innuendo, or other verbal or physical contact or conduct related to a status addressed by this policy.
- Offensive behavior includes making gestures or comments related to a protected status, offensive or vulgar jokes, sexual propositions, comments or discussions about sexual activity, physical attributes or conditions, stereotyping conduct based on a protected category, mimicking behavior, touching, attempts to touch, patting, pinching and indecent exposure, or the display of offensive materials, whether photographs, cartoons, or objects related to a protected status.
- Offensive behavior includes statements or inferences that submission to/acceptance of offensive behavior is explicitly or implicitly made a term or condition of an individual's employment (i.e., a job, promotion, assignment, raise, etc.).
- Offensive behavior includes statements or inferences that submission to/acceptance of, or rejection of offensive behavior by an individual is used as the basis for an employment decision(s) affecting that individual.
- Offensive behavior includes statements or inferences that are intended to, or do interfere with an individual's work performance, or create an intimidating, hostile, or offensive work environment.

It makes no difference if the behavior or conduct is not intended to offend or even if the behavior is welcome by the recipient.

No one associated with Integrated Health Partners is expected to tolerate offensive behavior in their workplace. Rather, such behavior should be reported via one or more of the following ways.

- Discuss the matter directly with the person exhibiting offensive behavior
- Discuss the matter with your manager or Human Resources Representative
- Discuss the matter with a director in the organization
- Contact IHP's Compliance Officer
- File a report through IHP's anonymous Compliance Reporting System

Integrated Health Partners maintains a strict non-retaliation policy for reporting a concern in good faith.

"Live with integrity, respect the rights of other people, and follow your own bliss."
Nathaniel Branden

My Relationships With IHP Providers and Business Associates

Integrated Health Partners exists to provide high quality health care services in the communities we serve, through the cooperative efforts of employees, physicians, providers, community employers and payers. IHP is a cohesive network of clinically integrated individuals and entities that are striving to transform the health care delivery system in our community. As such, everyone connected with IHP must be cognizant of their relationships with one another and avoid any situations where it appears these relationships influence decisions providers make involving the nature of care they provide.

IHP employees have a duty to act in the best interests of the Integrated Health Partners Organization. This means that all employees must be aware of how their relationships with providers, payers, and other business associates relate to their decisions involving IHP. As a Michigan non-profit corporation and a recipient of federal funds, IHP is subject to special laws and regulations. Failure to follow these laws and regulations can result in significant fines and penalties against the organizations and the involved persons, including managers who authorize such activities. Furthermore, failure to follow these laws and regulations will result in a profound detrimental effect on IHP's image in the community and among its network of affiliates.

What is Expected of Me?

As an employee, contract worker, provider or business associate of Integrated Health Partners, you are expected to:

- Maintain a positive, courteous and customer-service oriented attitude when interacting with IHP providers, payers and other business associates;
- Maintain objectivity and avoid actual or potential conflicts of interest that might interfere with your responsibilities at IHP;
- Make business decisions in the best interests of Integrated Health Partners;
- Act in IHP's best interest when they are making decisions about business associate relationships;
- Follow IHP policies and procedures addressing conflicts of interest generally requiring that employees discuss and obtain the advance approval of management for any situation that could present an actual or potential conflict of interest with IHP; and
- Follow IHP's policies requiring annual disclosure of any actual or potential conflicts of interest, as applicable to your position.

Examples of Activities that May Create a Conflict of Interest:

Gifts and Entertainment – Employees, providers and contract workers of Integrated Health Partners may not offer, solicit or accept gifts or entertainment intended to influence decisions made on behalf of the organization. You should be aware of and follow your organization's policies concerning the acceptance of gifts and entertainment offered by vendors or others doing business with your office or IHP. You are expected to use common sense and good judgment when accepting or refusing gifts or entertainment. In general, any acceptance of entertainment offered by a vendor should be infrequent, connected to a legitimate business purpose (e.g. be of benefit to the organization, rather than the individual), and not be of extravagant value.

Outside Employment – Employees may want to work for both Integrated Health Partners and another company that either does business with or competes with IHP. Before considering an offer to work for such an organization, you should discuss possible conflict of interest issues with management.

Service on Outside Boards – Employees and providers are encouraged to actively participate in various charitable or civic organizations that benefit our community. Before accepting an appointment to the board of any organization that may represent a conflict of interest with Integrated Health Partners, you should contact IHP about any possible conflicts that may arise from such service.

Financial Interests – It is generally considered to be a conflict of interest to do business with, or recommend that Integrated Health Partners do business with, a company in which you or a family member has a financial interest (excluding investments in large, publicly-held companies) or business relationship. Employees must obtain the advance approval of their manager in all such situations. Providers are encouraged to contact the IHP Compliance Officer about any potentially conflicting business relationships.

Integrity

"One of the truest tests of integrity is its blunt refusal to be compromised."
Chinua Achebe

FAQ

FREQUENTLY ASKED QUESTIONS
Re: Our Responsibilities to Providers and Business Associates

Q: I would like to get some extra hours by working at another organization or business in the health care industry. Do I have to talk to my manager before I can accept another position?

A: Before you consider an offer to work for a competitor of your employer, discuss the situation with your manager to make sure no potential conflict of interest exists that would interfere with your responsibilities to your employer and/or IHP.

Q: I recently received a call from a vendor seeking my input on a new product that is under development. The vendor will be holding an out-of-town meeting and has asked me to attend. The vendor is willing to pay my airfare, room and board for two days, as well as pay me for my time to attend the meeting at $50 an hour. Can I accept the invitation?

A: Integrated Health Partner's policies prohibit the acceptance of gifts, entertainment or other items of value, including payment of travel, lodging, and meal expenses, intended to influence decisions made on behalf of the organization. Exceptions may be allowed for IHP employees with the advance approval of management. Before accepting such an invitation, employees should think about the purpose of the meeting and the resulting expectation of the vendor as a result of your participation. If you can determine whether to purchase this vendor's product in the future, your participation in the meeting and acceptance of compensation and paid expenses by the vendor could be viewed as potentially influencing your decision-making. You should refer to IHP's policies and procedures for further guidelines and requirements and contact the IHP Compliance Officer.

Ethics

Q: Vendors frequently visit our office and bring in new products/devices for our physicians to sample. The vendors always want to provide lunches for the staff. I know the staff enjoy free lunches and the information provided by the vendors concerning their products and services is often helpful. Is it appropriate to accept free lunches from vendors?

A: You should consult your organization's policies concerning acceptance of gifts and obtain the advance approval of your manager. In general, an occasional lunch provided by a vendor may be allowed when connected with a legitimate business purpose such as a product demonstration. The value of the lunch should not be extravagant and there should be limits on how often lunches are provided by vendors. The lunch should be made available to all staff members – not just to those who have a role in deciding to purchase or use the product or service.

Q: My sister-in-law is a health care consultant. Would it be a conflict if I recommended her to work on a project at Integrated Health Partners?

A: Not unless you do something to provide her with an advantage or special consideration. You should fully disclose your relationship to anyone to which you recommend your sister-in-law. You should not participate in the hiring decision, nor use your position to influence the outcome of the hiring decision. Also, you must not share information with your sister-in-law that other prospective vendors or consultants would not have.

Q: Before coming to work at IHP, I consulted for another business in the health care industry and obtained information that would help our providers negotiate favorable contracts. Should I share this information with others in the organization?

A: No. Do not disclose confidential information learned through another job. We may not use this type of information in any business dealings. Further, it would be unethical to share confidential information you learn from your association with IHP with a future employer, should you leave the organization.

"Even the most rational approach to ethics is defenseless if there isn't the will to do what is right"
Alexander Solzhenitsyn

My Relationship With the Government and Other Payers

Health care organizations, including Integrated Health Partners, are subject to numerous laws and regulations that impact how we negotiate and deliver health care services. In addition, our federal and state governments are responsible for the payment of a significant portion of the health care services our providers provide to patients covered by the Medicare and Medicaid programs. Many laws and regulations are complex and challenging to apply in our rapidly changing industry. Nevertheless, IHP is committed to fully complying with all laws and regulations that apply to our organization. If your work responsibilities include business activities with physicians or other organizations that refer patients to other providers, you must be familiar with and follow the laws and regulations that affect those business activities.

What Is Expected of Me?

As an employee, contract worker, provider or business associate of Integrated Health Partners, you are expected to:

- Act with honesty and integrity in all your business activities;
- Follow all laws and regulations that apply to your work and ask for assistance if you have questions about how they affect you;
- Follow all requirements of government (e.g. Medicare and Medicaid) and other third-party payers, such as insurance companies, who pay for the health care services we provide. These requirements generally include maintaining complete and accurate medical records and submitting only complete and accurate claims for services provided;
- Protect the privacy and security of the health information we collect and the contract information to which we have access;
- Participate in training and education offered by IHP on those laws and regulations that apply to your work responsibilities; and
- Cooperate with any government investigation. Never, under any circumstances, destroy or alter documents requested as part of a government investigation, or lie or make false statements to a government investigator. In addition, never offer gifts or other items of value to government representatives.

What is Fraud and Abuse?

There are many federal and state laws designed to protect government programs, such as Medicare and Medicaid, and other third-party payers such as commercial insurance companies that pay for health care services. The Fraud and Abuse laws generally prohibit the following:

- Submitting inaccurate or misleading claims for services provided;
- Submitting claims for services not provided;
- Submitting claims that don't meet payer requirements (e.g. coverage for services);
- Making false statements or representations to obtain payment for services or to gain participation in a program;
- Offering or paying of money, goods or anything of value in return for the referral of patients to a health care provider; and
- Offering or giving something of value to patients to encourage them to use or purchase health care services.

What Does Not-For-Profit Mean?

IHP is a Michigan not-for-profit corporation. Community initiatives and medical education are examples of the types of activities that support our charitable purpose. Our not-for-profit status requires us to follow several additional laws and regulations that generally prohibit the following:

- Paying more than "fair market value" for goods and services;
- Providing goods or services to others at less than Fair Market Value, unless specifically allowed by federal or state law; and
- Using organization assets improperly for the benefit of board members, senior executives and others in a position of substantial influence over the business activities of IHP.

What is Fair Market Value?

In general, goods and services are at "fair market value" when their price is reasonable and consistent with current prices in the community for the same or similar goods and services.
Contact the IHP Compliance Officer if you have additional questions or need further guidance.

Do I Have a Relationship With the Government?

It may surprise you, but the answer is "yes"! While many federal and state laws and regulations that apply to our health care operations may not apply directly to the work you do, it's important for you to be aware of these requirements and to understand how they affect our organization.

"The most important persuasion tool you have in your entire arsenal is integrity."
Zig Ziglar

FAQ

Honesty

FREQUENTLY ASKED QUESTIONS
Re: Our Responsibilities to the Government

Q: While preparing a bill for submission to Medicare, I realized there were charges for services that I believe are inappropriate based on Medicare's billing rules. Should I submit the claim anyway and let Medicare determine if the charges are appropriate or not?

A: It is inappropriate to submit bills to Medicare, or other payers, that do not meet the payer's requirements. You should discuss this issue with your manager to determine an appropriate course of action. If an error is confirmed to have occurred, the claim should not be submitted for payment to the payer. If the error seems to be occurring regularly, the issue should be discussed with management responsible for the department or area involved so that appropriate actions can be taken to prevent the error from occurring in the future.

Q: Medicare notified us of some inaccuracies in our billing. The specific bills at issue have been resolved. However, we haven't changed our practices that caused the errors in the first place. What is my responsibility?

A: All of us have a responsibility to seek answers to our concerns. Speak with your manager to make sure you understand the situation. If you are still concerned that appropriate actions have not been taken to resolve the issue, contact the IHP Compliance Officer.

Q: In my work area, we refer many patients to local home care agencies for at-home services. One local home care agency recently offered to give us gift certificates in appreciation for our referring patients to their agency. Is this allowed?

A: No. Federal laws strictly prohibit health care providers from offering or accepting anything of value in exchange for the referral of Medicare and Medicaid patients. When making decisions about your patients, you must always consider what is best for the patient – not what's in it for you. You should discuss this matter with the IHP Compliance Officer so that appropriate follow-up can be taken with the home care agency.

Q: My job responsibilities require me to frequently interact with physicians on the medical staff. I understand there are specific laws and regulations that affect what the organization can and can't do for physicians. What are the rules and where can I find out more information?

A: You are correct that there are several federal and state laws and regulations that impact relationships with physicians. In general, it is inappropriate to offer or give gifts, gratuities or anything of monetary value to someone who is able to refer patients to a health care provider. Examples might include free supplies or equipment, office space, goods or services provided at less than Fair Market Value, or the write-off of a physician's accounts receivable balance or loan due to the organization. IHP has specific policies that must be followed for all relationships with physicians. Contact the IHP Compliance Officer to learn more about our policies and to further discuss your specific questions.

Q: May I respond to a government investigator who has asked about our organization's billing policies?

A: You should always cooperate and respond appropriately to any lawful government investigations. If such an inquiry is made while you are at work, immediately call your supervisor. It is appropriate for you to ask the government investigator for identification. Note the individual's name and the name of the agency he or she represents. Either you or your supervisor should immediately call your local compliance officer, your attorney, or the IHP Compliance Officer. Never lie or attempt to deceive a state or federal government representative. You may elect to inform the individual that you do not wish to respond to questions until your manager or an attorney representing your organization is present. Do not destroy any documents that you think the investigator might be seeking.

Q: My co-worker recently posted a notice on the IHP employee bulletin board asking co-workers to join her in forming a group to support a candidate for city council. Is this allowed?

A: No. Using IHP resources, such as bulletin boards, to participate or encourage participation in political activities is not allowed and could jeopardize the organization's not-for-profit status.

"Integrity is telling myself the truth. And honesty is telling the truth to other people."
Spencer Johnson

My Relationship With My Organization and the Communities We Serve

You also have a relationship with Integrated Health Partners and the communities we serve. As with other relationships, there are certain expectations and commitments of both parties to the relationship.

What Is Expected of Me?

As an employee, contract worker, or provider of Integrated Health Partners, you are expected to:

- Support IHP's Mission, Vision and Values through your behaviors, actions, and decisions;
- Create a culture that promotes our Code of Conduct;
- Represent the organization honestly and ethically in all your work activities and ask for assistance if you have questions;
- Properly use and protect IHP resources including supplies, equipment, staff time and talents, and financial assets;
- Use good judgment and follow your organization's policies for business travel and entertainment;
- Prepare and maintain accurate and complete financial records including accounting, budgeting, time and attendance, expense and other financial data and information;
- Retain all clinical, financial and employee information in accordance with IHP record retention policies;
- Respect the environment and follow your organization's policies for the handling and disposal of hazardous and infectious waste;
- Properly use and protect the confidentiality of business or other information you use or encounter in your work with IHP;
- Maintain appropriate professional licenses, certifications and other credentials required of your position; and
- Commit to your ongoing learning and development through timely completion of education and training assignments.
- Apply skills and techniques learned in training and development opportunities.

What Should I Expect from Integrated Health Partners?

A relationship is not a one-way street. In recognizing your commitment to our organization, you should also expect Integrated Health Partners to:

- Treat you with honesty, dignity, fairness and respect;
- Provide you a meaningful, rewarding work experience;
- Provide you a safe and supportive work environment free of harassment, intimidation, or violence;
- Provide encouragement and support for your continued learning and development;
- Provide resources for your training and development to assist your understanding of the various laws, regulations, and organizational policies that apply to your work;
- Promote a respectful environment that allows you to freely ask questions, seek clarification when needed, and raise issues and concerns in good faith without fear of harassment or retaliation; and
- Have your requests for information, input or assistance responded to in a timely and supportive manner.

Character

"A person's character is defined by how they handle life's challenging situations, not the easy ones."
Marc Lampe

FAQ

FREQUENTLY ASKED QUESTIONS Re: Our Responsibilities to the Community

Q: A patient has expressed racial preferences regarding any providers to whom he is referred. How should I respond to his request?

A: It is inappropriate to grant patient requests for providers solely based on patient preference for a race. Your organization should not accommodate patient requests that would cause it to be discriminatory based on race or ethnicity. Further, you should explain that the values of your organization do not allow race-based referrals and that the provider to whom you are referring the patient is best qualified to provide the patient's care.

Q: I supervise an employee who witnessed a co-worker giving the personal health information of a patient to a patient's relative who was not authorized to receive the information. What are my obligations in this circumstance? Should the patient be informed there has been a breach of confidentiality?

A: This matter should be referred to your HIPAA Privacy Officer or the IHP Compliance Officer for appropriate follow-up with those individuals involved.

Q: I am aware of an employee who regularly uses the Internet at work for personal activities. I am not in a position where I must "police" others and their use of time on the job. What should I do?

A: It is the responsibility of each employee to preserve the resources or assets of the organization. These assets or resources include supplies, materials, equipment, information, intellectual property and time. All of these are to be used for business purposes only. You should discuss the issue with your manager or the IHP Compliance Officer.

Questions to Ask Yourself:
When faced with a difficult issue or situation where you are unsure what to do, the following questions may assist you in making the right decision:

- Is the decision inconsistent with the Mission, Vision and Values of Integrated Health Partners?
- Will the decision affect the quality of patient care?
- Would I be comfortable telling my family about the decision or having it described on television or in a newspaper?
- Could the decision impact the reputation of my office or Integrated Health Partners if made known to the public?
- Could the decision negatively impact commitments the organization has made with employees, physicians, payers, or the communities we serve?
- Is there something about the decision that bothers me, makes me feel uncomfortable, or just doesn't "feel right"?

If the answer to any of these questions is "yes," seek the assistance of your supervisor or the IHP Compliance Officer.

Sincerity

"To give real service you must add something which cannot be bought or measured with money, and that is sincerity and integrity."
Douglas Adams

Where to Find Help

Delivering health care services is an increasingly challenging task, with complex and ever-changing rules and regulations that apply to our operations. As a result, there will likely be times when the answer to an issue or situation is not clear. As an employee or participating provider of Integrated Health Partners, you are responsible for seeking answers to your questions or concerns to ensure that you are satisfied that your actions are compliant with IHP's Mission, Vision, and Values. Fortunately, many resources and options are available to assist you.

Resources:

Your Manager or Director – This is usually the best place to start in getting answers to your questions. Because this individual understands the work you do, he or she may already have the information you need or can direct you to the right resource.

Executive Director – If you are not comfortable asking your manager or director, or do not agree with the answer you receive, consider discussing the issue with the Executive Director.

Human Resources – A Human Resources Representative can likely answer many of your questions, including assisting you in addressing workplace-related concerns.

Privacy or Security Officer – Contact the IHP HIPAA Privacy or Security Officer if you have questions or concerns related to the use and/or protection of patient health or confidential information.

IHP Compliance Officer – The IHP Compliance Officer is responsible for the operation of the IHP Corporate Compliance Program. The IHP Compliance Officer can assist you in obtaining answers to your questions and concerns.

IHP Compliance Reporting System – We encourage you to use one of the resources above to address your questions and concerns. However, if you are not comfortable using any of these resources, or if these resources have not fully resolved your concern, you can use the confidential IHP Comments Box or you may file an anonymous report online at www.integratedhealthpartners.net

IHP Compliance Reporting System

Confidential Email: The confidential email system is available 24 hours a day, seven days a week on IHP's website, www.integratedhealthpartners.net. The email system is sent directly to the IHP Compliance Officer via an anonymous email address. When you utilize the confidential email system, it is imperative that you provide as much information as possible. Your report will not be traced.

Comments Box: The IHP Comments Box is available during normal IHP office hours. The locked box is in the IHP staff break room and is accessed regularly by the IHP Compliance Officer. You may choose to submit questions, concerns, or reports in a confidential manner. The IHP Compliance Officer will receive all comments on the same or next business day.

When submitting a concern through either the confidential email or the Comments Box, you may choose to remain anonymous. Your report will be provided to the IHP Compliance Officer for review and investigation, in most cases with the assistance of management. Throughout the process of reviewing your concern, the information you provided will be treated confidentially. You may provide the IHP Compliance Officer with an appropriate way to contact you regarding the status of your concern.

IHP Non-Retaliation Policy

Ultimately, it is your responsibility to report issues and concerns. We understand that you may not wish to report concerns if you feel you may be subjected to retaliation or harassment. Integrated Health Partners' policies strictly prohibit retaliation, in any form, against an individual reporting an issue or concern in good faith. Retaliation is subject to discipline, up to and including dismissal from employment or participation, or termination of business relationships, as applicable, in accordance with IHP's policies.

The Compliance Officer for Your Organization is:

Nichole Clayton
Integrated Health Partners
269.425.7140 • claytonn@integratedhealthpartners.net

The Privacy Officer is :

Samantha Davis
Integrated Health Partners
269.425.7128 daviss@integratedhealthpartners.net

"To give real service you must add something which cannot be bought or measured with money, and that is sincerity and integrity."
Douglas Adams

Acknowledgement and Certification

I acknowledge that I have received a copy of the Integrated Health Partners' Code of Conduct. I acknowledge that I have read the Code of Conduct and I agree to discuss any questions I have with my supervisor, a higher-level manager, or other individuals responsible for my relationship with the organization. I understand Integrated Health Partners' Compliance Reporting System and I understand that I will not be retaliated against for asking questions or for making a good faith report about this Code of Conduct.

I agree that all my behaviors and actions could have an effect on Integrated Health Partners, both legally and/or relationally. I understand Integrated Health Partners' Mission, Vision, and Values and I agree to keep those ideals in mind whenever I make business related decisions. I agree to abide by this Code of Conduct during the course of my employment, participation, or other business relationship with Integrated Health Partners. I understand that I will be held accountable for my actions and behaviors inconsistent with the Code of Conduct. I understand that violations could result in disciplinary action, up to and including termination of employment, suspension or termination of participation, or termination of business relationships, as applicable, in accordance with Integrated Health Partners' policies.

Name: (please print) _____

Signature: _____

Date: _____

"Integrity is not a conditional word. It doesn't blow in the wind or change with the weather…

IHP Mission: *Integrated Health Partners seeks to assure accessible, cost effective, high quality health care for our community – and value for our members.*

IHP Vision: *Integrated Health Partners strives to build a regional system of high-quality health care through the cooperative efforts of physicians, providers, employers and payers.*

Core Values: *Integrity, Fearlessness, Innovation, Empowerment,* all driven by *Dedication,* and a *Mentoring Spirit.*

… It is your image of yourself, and if you look in there and see a man who won't cheat, then you know he never will."
John D. MacDonald

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