COMMONWEALTH HEALTH CORPORATION

Our Code of Conduct
OUR MISSION STATEMENT

Mission
Commonwealth Health Corporation's mission is to care for people and improve the quality of life in the communities we serve.

Values

Quality is the benchmark of our service. In all we do, we strive to meet and exceed our customers' expectations 100% of the time.

Service Quality service is our product. We are known for the successful delivery of services that meet the needs of those we serve. In recognition of this fact, we pledge "Quality...nothing less than Excellence."

People Our people are our most valuable resource. They provide the intelligence, creativity, compassion, and problem solving abilities which enable our organization to thrive. Our team is the cornerstone of our reputation and our hallmark of excellence.

Cost Efficiency We seek to utilize our resources in the most cost efficient manner to assure our customers the highest value for the services they receive.

Guiding Principles

- We strive continually to improve our quality of service.
- We pursue excellence in everything we do.
- We treat those we serve and each other with honor and respect.
- We recognize that our employees are the source of our strength and the basis for our success.
- We strive to be a contributing corporate citizen in every community we serve.
- We utilize every opportunity to evaluate wisely the cost-benefit outcome of our resources.

Vision

Commonwealth Health Corporation will be the leading integrated healthcare delivery system in South Central Kentucky and will be a major influence in reshaping healthcare.
INTRODUCTION

The Code of Conduct represents a reaffirmation of Commonwealth Health Corporation's long standing commitment to compliance and quality of services to our patients and to the communities we serve. The Code of Conduct applies to all employees, contract personnel, volunteers, affiliated students and physicians, each of whom has an affirmative duty to report a problem and a right to do so without the threat of retaliation. In addition, we expect anyone conducting business at or on behalf of CHC to adhere to standards set forth in the Code.

Anytime you are confronted with a situation with ethical or legal implications, it is your responsibility to get help. If you ever see, or believe we see, anything that may violate the law, our Code of Conduct, or the requirements of good patient care, you have the responsibility to speak up. The first place to turn is your manager, director, or Human Resources, but you can also go to the Compliance Officer or call the Compliance Hotline. The important thing is not so much where you get help; the important thing is to get help.

If you are suddenly in a situation that you do not know how to handle, examine your options by asking yourself these questions:

- Do my actions give the appearance of being unethical or illegal?
- Do my actions, or the actions I am aware of, cause harm to individuals?
- Do my actions meet CHC’s Code of Conduct?
- Am I being fair and honest?

The purpose of this Code is to provide fundamental guidance in all aspects of the organization including:

*Quality of Care*

*Privacy and Confidentiality*

*Conflicts of Interest*

*Principles of Human Resources*

*Billing and Coding Integrity*

*Environmental Safety*

*Compliance with Laws and Regulations*

*Safeguarding the Property and Interests of CHC and Patients*

*Conclusion and Compliance Hotline Information*
QUALITY OF CARE

Commonwealth Health Corporation will provide superior quality health care realizing that every opportunity for service is an opportunity for excellence. We are dedicated to continuous quality improvement by anticipating and exceeding the needs and expectations of our customers.

- We will provide high quality services in safe and healing environments that respond to individual, family and community needs.
- We believe that all employees at every level of the organization are responsible for maintaining the quality of their job performance.
- We will comply with state and federal legislation and regulations regarding patient rights.
- We will ensure that every patient will be evaluated and a treatment plan will be decided based on the patient's needs.
- We will seek out and employ only health care professionals with proper experience and expertise in meeting the needs of their patients.
- We will understand the needs of our clients and do our very best to meet those needs by providing high quality services and avoiding services that are unnecessary.
- We will strive to ensure that patients are well informed about treatment alternatives and the various risk associated factors.
- We will respect the patient's dignity, privacy, comfort, and convenience and will treat each patient with consideration, courtesy, and respect.
- We will treat all patients equally and with respect for their background, culture, religion, heritage, and age.
- We will not turn any patients away based on their ability to pay or based on any other factor that is substantially unrelated to patient care.
- We will give employees specific, clear information regarding the expected practices to be followed in the performance of their duties.
- We will communicate and demonstrate openness, honesty, and integrity through lawful and positive relationships with patients, employees, physicians, customers, and regulatory agencies.
- We will be responsible, as CHC employees, to report any deficiency or error in job performance in a timely and appropriate manner.
PRIVACY and CONFIDENTIALITY

We maintain the privacy and confidentiality of information protected under federal and state privacy laws; patient privacy rights; and ethical standards. HIPAA Privacy regulations pertain to information in any form - electronic, written, verbal and other media.

- We will respect the privacy of our patients, co-workers, and customers and safeguard patient, employee, and customer information from physical damage.
- We will protect the privacy of our patient’s health records according to state, federal and accreditation requirements.
- We will maintain medical and businesses documents and follow our record retention policy in accordance with the law, HIPPA and other applicable guidelines.
- We will only reveal medical, clinical, or business information when such release is supported by a legitimate clinical or business purpose, and complies with CHC policies and procedures, applicable laws, rules and regulations.
- We will not discuss patient, employee, or customer information in any public area, including elevators, hallways, stairwells, restroom, lobbies, and dining areas.
- We will exercise care to ensure that confidential and proprietary information is carefully maintained and managed to protect its value including salary, benefits, payroll, personnel files and information on disciplinary matters as confidential information while maintaining computer passwords and access Codes in a confidential and responsible manner.
- We will ensure that patient information, prices, contractual terms, names of CHC’s customers, and the nature of CHC’s markets are confidential matters. Such matters will not be discussed with other companies or individuals.
- We will not use any information obtained while working at CHC, directly or indirectly, for personal gain.

CONFLICT OF INTEREST

Commonwealth Health Corporation employees are expected to perform their duties without having their loyalty divided or compromised. Therefore, employees will avoid conflicts or appearances of conflicts between private interests and job duties.
It is important to avoid situations where the interest of an individual or group internal or external to CHC conflicts with the mission, objectives and values of CHC. We recognize that the potential for conflict of interest exists for employees at all levels within the organization. This includes members of the board, administration, the medical staff and all other employees.

- We will refrain from and avoid conflicts or potential conflicts of interest between our private interests and our responsibilities in performing our jobs.

- We will disclose any potential conflicts of interest to our immediate supervisor or appropriate personnel so that appropriate and timely action can be taken.

- We will refrain from placing family members or family businesses into positions that would indicate a potential for or actual conflict of interest unless deemed to be in the best interest of CHC.

- We will report any outside employment which might indicate a conflict of interest with CHC or which reduces our efficiency in performing our jobs at CHC.

- We will not engage in political activities which might unreasonably interfere with our ability to perform our duties for CHC or would be inconsistent with applicable law, rule, regulation, or Code of conduct.

- We will not solicit and/or accept tips or gratuities. Whenever gratuities are offered, they will be graciously declined. It is not intended that fruit, cookies, candy, baskets, flowers, most meals and drinks, greeting cards, and nominal holiday gifts fall within these limitations. It is also not intended that nominal vendor items, such as pens or pads, fall within these limitations. If a gift is sent or delivered to me, I will tell my supervisor in order to reduce the perception that the gift might influence me in any way.

- We, as individuals, will not endorse any particular service or product in the name of CHC or give the appearance of endorsing a product on the behalf of CHC, unless specifically directed to do so by an appropriate authority in CHC.

- We will refer through appropriate channels any actual or potential conflict of interest that has legal implications or may affect patient care.

**PRINCIPLES OF HUMAN RESOURCES**

Commonwealth Health Corporation is aware of the individual dignity and rights of all its employees and physicians, and recognizes and respects these rights and freedoms. We seek to create an environment in which fairness, equal opportunity, and professional development are available to all employees.
CHC is also fully aware of its responsibility for maintaining a just relationship between the interests of its employees and its patients and of the common responsibility to patient care that is shared by each member of CHC. We recognize that the rights of its employees, contract personnel, volunteers, affiliated students, physicians and its patients can be achieved only in the presence of a just, direct, and cooperative relationship between CHC and its employees.

Therefore, CHC believes that the interest of its employees, physicians, patients, and the community are best served by our continued voluntary observance of fair policies, and by our employees continuing to discuss with us directly, rather than through outside sources, any suggestion or complaint they may have.

- We will expect all employees and medical staff to conform to the standards of their professions and exercise appropriate judgment and objectivity in the performance of their duties.
- We will provide fair employee relations policies and practices as to wages, benefits and working conditions, and provide considerate supervision and as much job security as possible.
- We will assure equal opportunities and treatment regardless of race, sex, creed, color, age, national origin, religion, physical handicap, and/or any other factors protected by applicable law.
- We will require and assure that all levels of management will, through understanding supervision, apply all such policies and procedures fairly.
- We will pay salaries in accordance with an established wage and salary program.
- We will establish and maintain appropriate standards of work performance.
- We will act in a professional manner.
- We will strive to maintain open and effective lines of communication.
- We will inform and explain to employees, whenever possible, the meaning of, and reasons for, management actions which affect work assignments, duties, or interests of employees.
- We will encourage and give consideration to each employee’s comments and suggestions.
- We will, in keeping with our program of customer service (service excellence), emphasize courteous service to patients, families, physicians, visitors, employees, and others.
We will not permit any action of retaliation or reprisal to be taken against an employee who reports a violation of law, regulation, CHC policy, or Code of conduct. However, an employee making and reporting accusations known to be untrue will be subject to corrective action.

Anyone knowingly making false accusations or providing misleading information will be considered as not complying with this Code of Conduct.

We will hire based on candidates’ qualifications, ability, and past performance.

We will show proper respect and consideration to each other, regardless of position or station. Discriminatory treatment, harassment, abuse, or intimidation of any type will not be tolerated.

We will abide by the substance abuse policy as outlined in the employee handbook. It is CHC’s policy to maintain an environment that is free from alcohol and unauthorized drugs/substances, and to take reasonable measures to ensure that alcohol and drug use by covered individuals does not jeopardize the safety and health of our patients, visitors, employees, contract personnel, volunteers, affiliated students or the public.

BILLING AND CODING INTEGRITY

Commonwealth Health Corporation is committed to coding and billing appropriately and accurately for services provided to patients. Any deviation from this standard will be immediately reported to management.

We will bill only for services and supplies that are provided. Services provided and billed will be based on documented medical necessity.

We will comply with the CHC policy on State/Federal False Claims Acts and Whistleblower Protection.

We will accurately and truthfully bill clients and/or third-party payers, and we will not misrepresent charges to, or on behalf of, a client.

If inaccuracies are discovered in bills that have already been sent, the Business Office will take immediate steps to alert the payer and correct the bill.

We will not tolerate the submission of any claims which contain any kind of false, fraudulent, inaccurate, incomplete, or fictitious statement.

We will ensure that the diagnoses and procedures are properly coded and that they are supported by medical necessity requirements.
• We will take prompt steps to update the computer and manual coding and billing systems when diagnoses, procedures, and billing requirements are changed, in order to maintain compliance with established guidelines.

• We will obtain and maintain the knowledge and skills necessary to bill correctly based on the national guidelines.

• We will be honest and accurate in our transactions and activities.

• We will establish and maintain positive relationships with payer sources by negotiating treatment benefits in good faith and maintaining ongoing communication about patient progress and billing.

• We will have fair and competitive pricing.

• We will promptly refund any money received that is not due us.

• We will report suspected incidents of fraud, waste, and abuse.

ENVIRONMENTAL HEALTH AND SAFETY

Commonwealth Health Corporation fully understands the importance of creating and maintaining an environment where the health, safety, privacy, and comfort of the patients, employees, and visitors are critical. We will attempt to provide a safe place of employment, free from recognized hazards causing, or likely to cause, death or serious harm to employees, and conform to all State and Federal safety standards.

• We recognize and are committed to maintaining JCAHO and OSHA standards as minimum requirements in all environmental safety issues.

• We will strive to maintain a safe and comfortable environment for our patients, visitors, and employees.

• We will provide for as much privacy and dignity as practical within the guidelines that good medical care allows for our patients.

• We are committed and required to report to our supervisor any practice or condition that may violate any law, rule, regulation, safety or ethics standard.

• We recognize our position as a good community member and will maintain sound corporate environmental practices. We will ensure that employees with responsibility for the handling and disposing of hazardous material are properly trained in current handling techniques as well as provided with proper equipment and that any contractors hired practice currently accepted procedures.
COMMONWEALTH HEALTH CORPORATION, AFFILIATES, AND SUBSIDIARIES

- We will continually strive to educate and encourage our employees, patients, and community toward a healthy lifestyle.

COMPLIANCE WITH LAWS AND REGULATIONS

Commonwealth Health Corporation intends to operate according to high legal, moral, and ethical standards and in a manner which is sensitive to the needs and reasonable expectations of those whom we serve including patients, clients, vendors, physicians, employees, suppliers, lenders, and governmental entities.

- We will strive to conform to all applicable laws, regulations, standards and other requirements.
- We will expect all employees to avoid any conduct that is in violation of any statute, rule, or regulation.
- We will not knowingly engage in unethical or illegal activities.
- We will comply fully with the law and cooperate with any reasonable demand made in a government audit or investigation. In so doing, however, we will strive to protect the legal rights of CHC and our employees.
- We will make every effort to maintain all company business data, records, and reports completely, accurately and truthfully. All accounting records will be kept according to generally accepted accounting principles, established policies and standards and internal control procedures.
- We will only pay people or entities for legitimate services. We will never pay employees, physicians or other health professionals for referrals of clients.
- We will protect CHC’s patient and proprietary information. Such information will not be used for personal gain or gain by others.
- We will perform our duties in a manner that promotes public trust.
- We will demonstrate honesty, integrity, and fairness in the performance of our duties.
- We will ensure that all marketing and advertising representations of CHC will comply with established laws and regulations.
- We will comply with copyright regulations.
- We will expect any employee to report evidence of a suspected fraudulent or criminal act to the appropriate CHC authority as soon as reasonable after becoming aware of the violation.
We will make medical decisions regarding evaluation and treatment of patients with emergency conditions without inquiry as to financial or insured status and will comply with all federal and state regulations.

SAFEGUARDING THE PROPERTY AND INTERESTS OF CHC AND PATIENTS

Commonwealth Health Corporation is committed to protecting its assets and those of others entrusted to CHC, including, but not limited to, physical property and proprietary information against loss, theft, destruction, misappropriation, and misuse.

- We will be responsible and accountable for the proper expenditure of CHC funds and for the proper use of company property.
- We will follow established internal control procedures in handling and recording all funds and property.
- We will strive to preserve CHC’s assets, property, facilities, equipment, and supplies.
- We will develop and maintain a system of internal controls to protect adequately the assets of the corporation against fraud, waste, and abuse.
- We will not make personal or other improper use of CHC or patient resources or permit others to do so.
- We will dispose of surplus, obsolete, or junked property in accordance with policies.
- We will be responsible reasonably and lawfully to protect the individual rights of our clients and employees.
- We will not remove CHC documents from the premises unless approved by the appropriate authority.
- We will strive to make productive use of the time that is paid for by CHC.
- We will use computer systems, networks, and software only as authorized, and we will be expected to take all reasonable steps to protect them from unauthorized access or intrusion.
- We will promptly report-missing supplies to the proper CHC authority, including pharmaceuticals, office supplies, hardware, etc.
CONCLUSION

The success of the Corporate Compliance Program depends upon maintaining effective channels of communication. Compliance is everyone’s responsibility. Every member of CHC has an obligation to report situations or activities that are - or even seem to be - violations of the Code of Conduct. If something concerns you but you are not sure whether it is a violation of the Code, you must raise the concern and ask for advice. You do not have to be absolutely sure that you are right to make a report, but you must provide information that you believe to be true.

When you report concerns and violations, you provide an opportunity for CHC to investigate them and, if necessary, correct them before they can cause legal issues or negative publicity. If you are aware of a violation of the Code and don’t report it, you are allowing it to continue. Failing to report a violation is a violation in itself. If you know or suspect a violation and do not report it, you can face disciplinary action.

You have three ways to report concerns or violations:

- Contact your supervisor;
- Contact Human Resources; or
- If you are unsatisfied with the response received, or you are uncomfortable reporting to your supervisor or Human Resources, you should contact the Corporate Compliance Officer or call the Corporate Compliance Hotline.

Employees must be willing to bring forward problems and issues on a timely basis, especially those that have legal or regulatory implications. It is the responsibility of the management team to be receptive to all problems and concerns brought to them, to address these issues in a positive, open, and non-threatening manner and to continue to maintain effective channels of communication. Any employee raising a real or potential compliance problem, issue or question may do so without any fear of retaliation by anyone within CHC so long as the issue is thought to be true and is not brought forward as a deliberate intent to mislead.

MAKING A REPORT ANONYMOUSLY THROUGH THE COMPLIANCE HOTLINE

CHC has established a compliance hotline to ensure the timely identification and resolution of all issues that may adversely affect employees, patients or the organization. Calls are answered by an outside service, and your caller ID information is not recorded. You do not need to reveal your identity, but you should give enough specific to enable a complete investigation of the issue you are reporting.

The Hotline operator forwards your report to the Corporate Compliance Officer for investigation. When you call the Hotline, you receive a tracking number and a time to call back for an update on your report or the answer to your question. Employees may reach the Compliance Hotline at 1-800-826-6762, twenty-four hours a day, seven days
a week. The Compliance Hotline is not a substitute or replacement for CHC's established Appeal Procedure, which is described in the Employee Handbook.

Calls to the Hotline will not be traced or recorded. Callers to the Hotline may remain anonymous. If you choose to identify yourself, your identity will be kept confidential to the fullest extent possible within the limits of the law. You can be assured that there will be no retaliation against anyone who reports a problem to the compliance hotline. The Corporate Compliance Officer will investigate all concerns raised through the compliance hotline.