

COMPLIANCE

Code of Conduct

Introduction

Penn State Hershey leadership has adopted a comprehensive Corporate Compliance Plan and Code of Conduct and is committed to full compliance with all Federal health care program requirements. This Code of Conduct outlines how officers, directors, employees, medical staff members, and contractors who provide patient care, billing or coding services of The Milton S. Hershey Medical Center should properly conduct business to follow federal and state laws. It is leadership's expectation that everyone will understand and follow this code and perform their jobs honestly and with specific regard for such laws. It is your responsibility to act ethically and legally with each person you come in contact with – patients, families, visitors, physicians, volunteers, vendors and other employees. This is the promise we make to our patients and the communities we serve.

This Code of Conduct was developed to ensure that you understand the complexity of the laws so you can abide by them. You must be aware of laws that apply specifically to your job and obey them at all times.

This Code of Conduct does not replace any existing policies or procedures. It is designed to supplement institutional procedures and policies.

If you know of or suspect any conduct that may be illegal or unethical or is a potential violation of any Federal health care program requirement or Hershey Medical Center policy, you are required to report it to your supervisor, the Hershey Medical Center Chief Compliance Officer at 717-531-1114, or to the Compliance Hotline at 800-560-1637 which may be called anonymously, 24 hours a day.

Patient Rights

Because we want to provide the best possible care to our patients and their families, we hire the most qualified people, educate them, and continually monitor and enhance their skills, behaviors and knowledge. In an effort to improve our business, we do not ignore mistakes, but take steps to correct them.

Patients expect reasonable access to care, regardless of age, ancestry, color, disability or handicap, national origin, race, religion, sex, sexual orientation, or veteran status. We treat patients whether they can pay or not and respect their personal beliefs and values. We encourage patients to participate in medical and ethical decisions about their care. We do not

share confidential patient information with anyone who does not have a legal need to know. We provide excellent care to avoid instances of poor services, such as:

- Bad manners to a patient or family member;
- Action that might put patients in danger;
- Failure to provide prescribed care;
- Stealing patient property;
- Not documenting a patient's living will;
- Not reporting problems with equipment; and
- Not providing a proper examination for emergency department patients.

Patient care standards are included in the policy and procedure manuals throughout the Medical Center. You must be aware of the policies and laws that apply to your specific job.

Fraud and Abuse

Healthcare fraud and abuse takes many different forms. Filing false claims, intentionally or carelessly using incorrect billing codes, providing unnecessary services, or paying for patient referrals, could be considered fraudulent or abusive. You are required to avoid these types of activities and are required to ensure that services performed are properly documented and that billings and codes are accurate.

We arrange financial and business relationships with the advice of legal counsel whenever necessary. We report costs under generally accepted accounting principals and according to Medical Center policy. We report expenses, with the proper authority, and through the prescribed processes in a timely manner. In making estimates for financial reporting purposes, we make the best possible estimate regardless of the impact on results or other measures. The Medical Center is operated for the benefit of the community. Persons in a position to influence the hospital should not personally benefit from hospital activities.

Care and compliance with applicable policies and guidelines must be exercised when providing gifts, meals, refreshments, travel or lodging for government or public officials, to avoid the appearance of intent to influence an official action or decision. You must consult your supervisor or department head, the Chief Compliance Officer, or call the Compliance Hotline, if you have any questions or concerns about possible fraud and/or abuse.

Record Keeping

A large facility like ours has many kinds of records. Because it is impossible to list all of the applicable rules and regulations, you must learn and comply with the rules and regulations that apply to the documents you are required to work with. Remember:

- We do not falsify facts or make false records;
- We give records only to people who have a legal "need to know";

- We keep records for as long as the law requires;
- We preserve patient confidentiality; and
- We dispose of records in accordance with established policy.

Integrity of Workforce

Our reputation for quality service is a result of your performance. Remember to conduct yourself with personal integrity, good judgment and common sense at all times. Business decisions must be made in the best interest of the Hershey Medical Center, without regard to personal interests or gain. A conflict of interest can result when an employee benefits, or appears to benefit, from a Hershey Medical Center business decision. Potential conflicts of interest should be disclosed to your supervisor or administrator. The receipt of gifts or gratuities from those seeking to influence Hershey Medical Center decisions must be politely declined.

Open and Honest Communication

You are to be supportive with other staff members and be honest in your work with them. We are committed to creating a workplace where everyone feels free to discuss concerns about any issue. We deal honestly and fairly with patients, families, community members, vendors, competitors, payers, and outside contractors.

Workplace Safety and Health

We expect you to follow safety standards and regulations and to report unsafe conditions to your supervisor.

Hershey Medical Center Resources

We are required to protect Medical Center property and to use our facilities and equipment appropriately. You are not permitted to borrow Medical Center property without permission or use Medical Center time, facilities, resources, or equipment for unapproved purposes. Ask your supervisor, department head, administrator, or the Chief Compliance Officer, if you have questions about the appropriate use of Medical Center property or resources.

Relationships with Competitors/Vendors

Information about the business affairs of the Medical Center, such as strategy, prices, costs, finances, and similar matters are confidential. You are not to discuss private hospital business with anyone outside of the Medical Center. Contracts and contract negotiations are conducted in accordance with the law. Business integrity is important in choosing our business partners.

General Laws

You are required to comply with laws and rules specific to your job, not just those mentioned in this document. When in doubt, ask for clarification from your supervisor, department head, administrator, or the Chief Compliance Officer.

Should any federal or state law enforcement official request information from you, you are required to have them contact the Chief Compliance Officer. You are also required to contact the Chief Compliance Officer to advise him/her of this inquiry. If these officials are on hospital grounds requesting information, you are required to immediately contact your supervisor and the Chief Compliance Officer.

Failure to Comply with Federal Health Care Program Requirements

Healthcare providers and suppliers (persons and organizations) who violate the Federal False Claims Act can be subject to civil monetary penalties ranging from \$5,500 to \$11,000 for each false claim submitted. In addition to this civil penalty, providers and suppliers can be required to pay three times the amount of damages sustained by the U.S. government. If a provider or supplier is convicted of a False Claims Act violation, the Office of Inspector General may seek to exclude the provider or supplier from participation in Federal health care programs.

Conclusion

You are required to obey the laws, carry out your duties in an ethical manner, and follow all established policies and procedures. You are also required to report any known or perceived violations or any employee misconduct. Violations are serious matters. Corrective action, including termination, outlined in institutional policies, as well as possible legal action, could result.

Certification

I acknowledge that I have read and will follow this Code of Conduct. I pledge to obey the law, carry out my job responsibilities in an ethical manner, and follow the established policies and procedures of the Milton S. Hershey Medical Center.