

**INTEGRIS**

# Code of Conduct



## Table of Contents

Letter from the President & CEO.....	1
Introduction.....	2
Corporate Compliance Program .....	3
Patient Care .....	4
Admissions, Treatment and Referrals.....	5
Billing and Coding/Fraud, Waste & Abuse .....	7
Proper Accounting and Recordkeeping .....	10
Conflicts of Interest.....	11
Business Courtesies, Gifts and Customer/Supplier Relations .....	13
Competition and Antitrust.....	16
System Property, Technology and Confidential Information .....	17
Workplace Behavior and Equal Employment Opportunities .....	18
Safety, Health and Environmental Matters .....	20
Marketing and Media Inquiries .....	21
Dealing with Government Officials and Regulatory Agencies .....	22
Privacy and Security of Health Information .....	23
Integrity Line.....	25
Disciplinary Action and Enforcement .....	26
Related Policies and Procedures .....	26
Contact Resources.....	29
Compliance Certification .....	30

*The INTEGRIS Code of Conduct is formerly known as "Guiding Values."*

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# INTEGRIS

To all INTEGRIS Caregivers:

This booklet is your personal copy of the Code of Conduct (“Code”) of INTEGRIS Health. INTEGRIS is deeply committed to delivering safe, high-quality healthcare services while maintaining the highest standards of business conduct and compliance with applicable laws and regulations. The Code is a vital part of how we achieve our mission, vision and values and continuously improve. It supports in shaping and maintaining a culture of integrity and compliance.

The Code is not intended to be all-inclusive, but to provide a general ethical guidance and to serve as a resource to help resolve questions about appropriate work place conduct. The Code covers a variety of topics designed to equip caregivers with the skills necessary to make the right decisions on a daily basis. No matter your role (employee, physician or other professional staff, board member, contractor or other), we are all caregivers engaged in a clinical enterprise.

The Code is designed to communicate: (1) the basic principles and standards of behavior expected in the INTEGRIS work environment; (2) the commitment of INTEGRIS to comply with laws, regulations, standards of care and ethical business practices; and (3) the responsibility we all share for keeping INTEGRIS in compliance with all applicable laws, regulations and policies. It has been approved by the executive leadership of INTEGRIS, as well as the INTEGRIS Board of Directors, and represents a reaffirmation of our long-term commitment to compliance and safe, high quality services to our patients and the communities we serve.

If you have questions or concerns about the Code, or possible ethical violations in the workplace, I urge you to talk immediately with your supervisor, another member of management at your facility, or the Corporate Compliance and Privacy Officer. If you prefer to remain anonymous, I encourage you to use our toll free Integrity Line at 1-888-243-9597. All communications will be treated confidentially and without retaliation.

I ask that each of you carefully read the Code and sign the compliance certification form at the back of the booklet. Each of us must certify in writing that we understand the Code and the importance of compliance. Your commitment is essential to the success of the INTEGRIS mission.

Respectfully,

A handwritten signature in black ink, appearing to read "Timothy Pehrson", written over a light blue rectangular background.

Timothy Pehrson  
President and CEO  
INTEGRIS Health, Inc.

## Introduction



INTEGRIS' values can be identified by three simple but very powerful concepts of Love, Learn and Lead.

## Value Statements

### **Love**

- Treat self and others with kindness, dignity and respect
- Be patient and forgiving
- Serve others with a caring heart

### **Learn**

- Listen, ask and be open
- Improve every day
- Understand our business
- Create a learning environment

### **Lead**

- Seek and provide direction and vision
- Expect and acknowledge excellence
- Demonstrate honesty
- Develop relationships
- Show courage to make a difference
- Lead by example

It is necessary to make many decisions every day, and making the right ones is not always easy. INTEGRIS sets forth basic expectations for personal and professional behavior in the workplace. These expectations are applicable to INTEGRIS employees, medical staff, allied health staff, board members, contractors, vendors and agents (hereinafter referred to as "Affiliate" or "Affiliates").

It is impossible to create a Code that will address every situation you may encounter during your affiliation with INTEGRIS. However, when faced with a difficult situation, you should stop and consider your actions in the context of the standards of conduct presented in this booklet.

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## **Corporate Compliance Program**

As part of its commitment to comply with all applicable federal health care program requirements in the conduct of its business, INTEGRIS has established a Corporate Compliance Program and designated a Chief Compliance Officer to oversee it. All INTEGRIS Affiliates are responsible for supporting and adhering to the Compliance Program and following the principles described in this booklet.

In certain instances, you may encounter a compliance or ethical situation where you need additional guidance or direction. You should first seek the guidance of INTEGRIS management or the INTEGRIS policy manuals. Compliance policies may be found in the Compliance section of the System Policy Manual or on the Corporate Compliance intranet web site. You may also contact Human Resources, the Chief Compliance Officer, or the Integrity Line for direction.

Affiliates are encouraged to alert management and the Board, through established reporting procedures, of ethical issues and potential violations of law.

Questions to ask yourself: -----

1. Does the situation involve a violation of law, regulation, or INTEGRIS policy?
2. Does the situation involve unethical behavior?

If the answer to either of these questions is yes, you have a duty to report the situation!

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## Patient Care

INTEGRIS is committed to delivering high-quality care, products and services to its patients in a compassionate, respectful and efficient manner. Patients will be treated with dignity and respect at all times. INTEGRIS will provide each patient with information regarding his or her rights and responsibilities and will endeavor to protect those rights throughout their care and treatment.

- Patients are entitled to considerate, respectful, non-discriminatory care;
- Patients are entitled to communicate with those responsible for their care, including prompt and courteous responses to their requests and to their need for treatment and services;
- Patients are entitled to a complete disclosure and explanation of all charges related to their care and treatment;
- Patients have the right to participate in and make their own healthcare decisions after being informed of all relevant information, such as diagnosis, prognosis and the benefits and risks of available treatment alternatives;

- Patients have the right to refuse medical treatment to the extent permitted by law after being informed of the medical consequences of such refusal;
- Patients have the right to personal privacy;
- Patient's medical records, and the contents thereof, must be kept strictly confidential. INTEGRIS Affiliates will observe the highest standards of ethical conduct with respect to such information, and as required by law.

Questions to ask yourself: -----

1. Do I always treat patients with respect and dignity?
2. Am I careful not to let my personal feelings or circumstances interfere with patient care?
3. Do I let a responsible person know if I believe the confidentiality of patient information has been breached?
4. Am I careful not to leave patient files, reports or other information in areas that could be viewed by the public?
5. Do I follow INTEGRIS policies for releasing patient information?

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## **Admissions, Treatment and Referrals**

Only those patients who need and will benefit from the services INTEGRIS provides will be admitted or accepted for care and treatment. Standard clinical admissions criteria that include medical necessity guidelines are used to determine whether or not an individual is admitted.

INTEGRIS complies with all federal and state laws and regulations regarding evaluation and treatment of patients with emergency medical conditions (including those arising from

mental illness and substance abuse). Each person presenting at the Emergency Department (or other recognized areas for the provision of emergency treatment) seeking treatment will be provided an appropriate medical screening examination, which will not be delayed in order to determine the patient's insurance or financial status. Patients with emergency medical conditions will either be stabilized or appropriately transferred to another hospital pursuant to applicable law.

Each patient is treated as an individual. Medical professionals develop treatment plans to meet the specific needs of every patient, utilizing a multidisciplinary approach. Treatment is provided in the least restrictive environment appropriate to the individual patient's needs.

Discharge planning begins at the time of admission and continues throughout the treatment process. The patient, the patient's family and loved ones, and the clinical team are all involved in the discharge planning process. Patients are discharged with an aftercare or follow-up plan including interface with community organizations and support groups whenever possible. In cases where care is needed in the home, INTEGRIS, in accordance with federal laws and regulations, does not require patients to use INTEGRIS-owned or operated home health agencies. Patients have complete freedom of choice.

Physicians and other health professionals who are not employees of INTEGRIS are free to refer patients to any person or entity they deem appropriate. If you are in a position to make referrals, you should make such referrals based solely on the interests of the individual seeking care and treatment. INTEGRIS does not make payments or provide non-cash benefits to anyone for providing a referral or admission, or to induce a referral or admission.

Questions to ask yourself: -----

1. Am I aware of arrangements where individuals are paid for referrals or admissions?

2. Do I know of situations where patients are not given adequate choice with regard to home care?
  3. Am I aware of situations where a patient seeking emergency treatment is turned away for financial reasons?
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## **Billing and Coding/Fraud, Waste & Abuse**

INTEGRIS bills only for care and services rendered that are properly authorized and documented as medically necessary. INTEGRIS will not tolerate anyone misrepresenting the services, supplies and equipment furnished, or extent of services, supplies and equipment rendered, in order to circumvent coverage limitations or to increase payments from third parties. INTEGRIS will not bill for investigational/experimental devices and/or procedures not approved by the FDA unless authorized for billing by the payer. Affiliates must not alter a billing record or change billing codes to avoid “edits” or claim denials. Diagnosis and procedure codes must be supported by medical record documentation. Contacts made to obtain missing information must be properly documented.

We will take every reasonable precaution to ensure that our billing and coding work is accurate, timely and in compliance with our policies and federal and state laws and regulations. If you work in a billing or coding area, or provide patient care items or services, you are expected to understand and comply with all applicable federal health care program requirements and related policies and procedures established by INTEGRIS.

It is INTEGRIS’ policy to refund any overpayments made as a result of billing errors and to notify the appropriate payer. Credit balances must be reported timely and in accordance with government policies and instructions.

As a matter of policy, INTEGRIS does not waive insurance copayments or deductibles except under specifically approved situations such as documented financial hardship. Government

regulations and most insurance carrier contracts require us to collect these payments from patients.

There are a number of laws that prohibit fraud, waste and abuse, including: (i) Federal Anti-Kickback Statute; (ii) Federal False Claims Act ("FCA"); (iii) Federal Administrative Remedies for False Claims; (iv) Physician Self-Referral law or Stark law; (v) Beneficiary Inducement Civil Monetary Penalty Law; (vi) Exclusion from Federal Health Care Programs; (vii) Federal Health Insurance Portability and Accountability Act ("HIPAA"); and (viii) the Oklahoma Medicaid False Claims Act ("OMFCA"). The potential penalties for violation of these laws include: (i) civil money penalties; (ii) criminal conviction/fines; (iii) civil prosecution; (iv) imprisonment; (v) loss of provider license; and (vi) exclusion from federal health programs, including Medicare.

INTEGRIS Affiliates shall comply with these laws prohibiting fraud, waste and abuse. Fraud requires the person to have intent to obtain payment and the knowledge that their actions are wrong. Waste and abuse may involve obtaining an improper payment, but does not require the same intent and knowledge. Abuse involves payment for items or services when there is no legal entitlement to that payment and the healthcare provider has not knowingly and/or intentionally misrepresented facts to obtain payment. Waste is the overutilization of services or other practices that, directly or indirectly, result in unnecessary costs of the healthcare system, including Medicare.

Fraud, waste and abuse activities may include knowingly (1) billing for services not rendered, (2) including improper entries on cost reports or incorrect codes on charges or bills, (3) failing to seek payment from all available sources, (4) otherwise falsifying, forging, altering or destroying documents to secure payment, or (5) over-utilization of resources.

All INTEGRIS Affiliates are required to participate in the prevention, detection and reporting of fraud, waste and abuse of resources. If an individual believes that a representative of INTEGRIS is engaging in fraud, waste or abuse activities, he/she should immediately contact a member of administration, Corporate Compliance, Legal Services or the Integrity Line. Affiliates who in good faith report a violation or assist in an

investigation cannot be retaliated against in the terms and conditions of their employment, contractual relationship, or medical staff or allied health staff membership as a result.

Individuals with first-hand knowledge of fraudulent billing may sue the entity that submitted the false claim on behalf of the United States and may share in the percentage of the proceeds. However, the FCA also provides that a person may have to pay the defendant for its legal fees and cost of defense if the person brings an action for the purpose of harassment and/or an action that has no merit.

Questions to ask yourself: -----

1. Are all bills for services supported by clinical documentation?
2. Does the clinical documentation support the necessity for, and level of, the services provided?
3. Do I alter bills in any way to avoid third-party edits or denials?
4. Am I ever instructed to process a bill in a way that is contrary to my understanding of third-party rules or regulations?
5. Am I ever asked to change a code or bill in order to increase reimbursement, even though I believe another code with a lower reimbursement is more appropriate?
6. Do I report credit balances or overpayments according to policies?
7. Am I asked to waive a patient copay or deductible without a documented reason?

8. Am I aware of the INTEGRIS written policies and procedures for coding and billing claims to Federal health care program payers?

## **Proper Accounting and Recordkeeping**

All INTEGRIS records shall be prepared accurately, reliably, honestly and in accordance with established finance and accounting procedures. Entries of cost, financial or similar business information shall be made only to the regularly maintained books and records of INTEGRIS. INTEGRIS maintains a system of administrative and accounting controls to: (1) safeguard its assets; (2) check the accuracy and reliability of its accounting data; (3) promote operational efficiency; and (4) encourage compliance with laws and regulations. Affiliates are encouraged to report what they reasonably believe may be inappropriate financial activities. No officer, director, or Affiliate shall take any action to influence, coerce, manipulate, or mislead the auditor of INTEGRIS' financial statements.

All records should be stored in a secure location for the period of time required by law or INTEGRIS policy, whichever is longer. Records should be organized in a manner that permits prompt retrieval. Old or unneeded records, either in electronic or paper form, should be properly disposed of, or purged, in accordance with the applicable document retention schedules. An Affiliate should never destroy or alter any document in anticipation of, or in response to, a request for those documents by any government agency, court or an INTEGRIS litigation hold.

Questions to ask yourself: -----

1. Do I follow INTEGRIS record retention and destruction policies?
2. Am I honest in filling out expense reports, timesheets, and/or other financial records?

## Conflicts of Interest

A conflict of interest occurs when a relationship or activity influences or impairs or even gives the appearance of impairing your ability to make objective and fair decisions in the performance of your job, or is contrary to INTEGRIS' mission and interests. In other words, you should not place yourself in any situation that might force you to choose between your personal or financial interests and the interests of INTEGRIS.

Employees shall not engage in outside activities during working hours scheduled for INTEGRIS and must not use INTEGRIS equipment, supplies or information in connection with any outside activities. Self employment or employment by others is permissible only if it does not adversely affect the employee's job performance for INTEGRIS or create a conflict of interest.

No director or officer of INTEGRIS may become an officer or director of, or accept a position of responsibility with, any other company without the approval of the board of directors.

Each medical staff member, for so long as he/she is granted membership and/or clinical privileges at an INTEGRIS facility, is expected to conduct his/her professional practice for the benefit and in the best interests of the facility. The applicable Medical Staff Bylaws require each medical staff member to cooperate and provide general support for the facility. Medical staff members may have clinical privileges at competing institutions. INTEGRIS does not prohibit or in any way limit an independent medical staff member's ability to admit patients to other health-care facilities. INTEGRIS does not in any way require the admission, recommendation, referral or other form of arrangement for utilization by patients of any item or services offered by INTEGRIS.

### **Here are some instances in which conflict of interest may exist:**

- Physician Self Referrals – referring patients or an immediate family member for a designated health service to an entity in which you (the physician) have a

financial or ownership interest for which payment may be made by a federal health care program;

- Direct or indirect ownership of, or substantial interest in, a company that is a competitor or a supplier of goods and services to INTEGRIS;
- Acceptance of gifts, payments or services from those doing business or seeking to do business with INTEGRIS;
- Serving as a director, officer, consultant or other key role with a company doing business or seeking to do business or competing with INTEGRIS;
- Hiring or contracting with a family member of friends to provide goods or services to INTEGRIS; or
- Soliciting patients, physicians, or other employees on behalf of another health care provider on INTEGRIS' premises

In certain instances, conflicts of interest may arise despite your best efforts to avoid them. If such a situation arises, you must promptly and fully disclose any business or financial interest or relationship you, or a member of your family, have that might reasonably be construed as constituting a substantial influence on your ability to meet your obligations to INTEGRIS.

Questions to ask yourself: -----

1. Do I ensure that my relationship with a competitor or supplier does not create the appearance of a conflict of interest?
2. Do I refrain from using system data or property for personal gain?

3. Do I protect information about INTEGRIS, suppliers or competitors from persons who could use that information for unlawful purposes?
  4. Do I make sure that my family members are not involved in another business activity that might interfere with how I perform my duties as an INTEGRIS Affiliate?
  5. Do I disclose any potential conflicts of interest to INTEGRIS?
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## **Business Courtesies, Gifts and Customer / Supplier Relations**

INTEGRIS does not want to give or receive business obtained through the improper use of business courtesies, gifts or relationships. It is against the law and system policy to give or receive any "remuneration" either in return for or to induce: (1) a patient referral; or (2) the purchase, lease or order of any goods, facility, service or item. Remuneration is defined as anything of economic value, including a kickback, bribe or rebate, in cash or in-kind. Even the opportunity to earn money may be considered remuneration.

INTEGRIS deals with many suppliers. It is our policy to select suppliers on the basis of such factors as price, quality, performance and suitability of products or services, quantity, delivery, service and reputation. You should not accept or solicit any benefit from an existing or potential supplier that might compromise, or appear to compromise, your objective assessment of the supplier's products or services.

Your business relations with suppliers must be conducted at arm's length both in fact and in appearance. You should regulate your activities to avoid actual impropriety and/or the appearance of impropriety that might arise from the influence of those activities on business decisions of INTEGRIS or the

supplier. All INTEGRIS contracts must be reviewed by Legal Services.

Finally, you may not solicit or use your position with INTEGRIS to secure a special discount or other favorable treatment for yourself or others not extended by the supplier to all INTEGRIS employees or similarly situated Affiliates.

This policy is not intended to preclude the acceptance or giving of common, non-cash courtesies, provided that: (1) the value of the gratuity is nominal in relation to the circumstances in which it is offered and accepted; and (2) it is not intended to influence a business transaction. Examples of acceptable gifts and gratuities include:

- An unsolicited, non-cash gratuity such as food and refreshments;
- Unsolicited advertising or promotional material, such as a pen, calendar, paperweight or similar memento;
- A gift from a personal friend or relative when it is clear that the motivation for the gratuity is the personal or family relationships and not any existing or potential business relationship;
- *Bona fide* reimbursement for actual business expenses of travel, lodging and meals incurred during the course of one's official duties and for which reimbursement is not also received from INTEGRIS;
- Periodic meals paid for by a supplier, which occur in the normal course of business discussions or negotiations.

INTEGRIS will not provide non-monetary compensation to referring physicians on its Medical Staff in an amount that would exceed the non-monetary compensation limit for the applicable calendar year, as periodically adjusted by the Centers for Medicare and Medicaid Services. All non-monetary compensation provided to referring physicians must be tracked

in the central database for INTEGRIS hospitals. Examples of non-monetary compensation include, but are not limited to, coffee mugs, note pads, massages, manicures/pedicures, physician birthday cakes, golf green fees, off-campus meals, and tickets to plays, concerts, and sporting events.

INTEGRIS will not provide Medical Staff incidental benefits to referring physicians in an amount that would exceed the per occurrence limit on incidental benefits for the applicable calendar year as set forth at 42 C.F.R. § 411.357(m)(5), and periodically adjusted by the Centers for Medicare and Medicaid Services. Examples of Medical Staff incidental benefits include, but are not limited to, free or discounted meals and refreshments at the entity, discounted parking at the entity, computer/internet access or pagers used only to access INTEGRIS medical records and information or to access patients or personnel who are on an INTEGRIS campus, laboratory coats, photocopying, and identification of referring physicians on the hospital's website or in hospital advertising, as long as individual referring physician private practices are not promoted

Questions to ask yourself: -----

1. Do I refrain from offering or accepting gifts, courtesies or entertainment from suppliers or customers with the intent to give or receive business in return?
2. Do I always follow purchasing policies?
3. Do I always reject any offer of cash from a customer or supplier?
4. Do I have all contracts reviewed by Legal Services?

## Competition and Antitrust

INTEGRIS must comply with applicable antitrust and similar laws that regulate competition. Examples of conduct prohibited by the antitrust laws include: (1) agreements to fix prices; (2) bid rigging; (3) collusion with competitors; (4) boycotts; (5) certain exclusive dealing; (6) price discrimination agreements; and (7) unfair trade practices including bribery, misappropriation of trade secrets, deception, intimidation and similar unfair practices. Activities that reduce or eliminate competition, control price, allocate markets or exclude competitors should be avoided.

INTEGRIS is a tax exempt, not-for-profit corporation. Affiliates should not engage in any activity that involves the use of INTEGRIS resources or property for any private use or benefit. Any transactions entered into by INTEGRIS and an Affiliate must be in the best interest of INTEGRIS and negotiated at arm's length for fair market value. Affiliates faced with situations that appear to be questionable should consult with INTEGRIS management, Legal Services or contact Corporate Compliance for guidance.

We must not only obey the law but should also conduct ourselves so that it will not appear that the law is being violated. No matter how innocent a particular act may be, if it is done in a way that can lead others to believe a violation may have occurred, an investigation or other legal action may result.

Anyone with questions about price or market information disclosure, interpretation concerning antitrust laws, trade regulations and tax exemptions requirements, or anyone who suspects that a violation has occurred should contact the Chief Compliance Officer or the Legal Services department.

Questions to ask yourself: -----

1. Do I refrain from relationships with competitors that may offer collusion or improper competition?

2. Am I aware of situations where INTEGRIS resources or property are being used for private purposes.

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## **System Property, Technology and Confidential Information**

INTEGRIS' assets, which are assigned or made available to Affiliates, may be used only for authorized business purposes. Any other use, such as for after-hours charitable work, must receive prior approval from management.

Those who are given custody of company equipment, or other assets, are expected to understand the proper use and maintenance of the equipment or asset. All company assets in the custody of an Affiliate are to be returned in acceptable condition upon request or when the Affiliate's relationship with INTEGRIS ends.

INTEGRIS considers confidential and/or proprietary information to be an asset of the corporation, either during or after employment or other contractual relationship or Medical or Allied Health Staff affiliation, and such information should not be shared with others, including fellow Affiliates, unless they need to know for a legitimate business reason. Similarly, it is INTEGRIS' policy to respect the trade secrets and intellectual property rights of others and to refrain from obtaining or using this information in an unethical manner.

INTEGRIS intends to fully comply with all copyright and software licensing laws. You may not make copies of computer software for personal or professional use. Doing so could be a violation of federal copyright laws.

INTEGRIS does not provide funds, equipment, facilities or assets to be used to support a political party, candidate, holder of any government position or any community organization without appropriate senior management approval.

Questions to ask yourself: -----

1. Am I careful not to use or share non-public information for my own personal use?
  2. Do I respect the intellectual property rights of others?
  3. Do I refrain from making copies of software for personal or professional use?
  4. Do I use company copiers or supplies, such as “scrubs,” for personal use?
  5. Do I ever request INTEGRIS to reimburse me through an expense report, or other means, for what could be construed as a direct or indirect political contribution?
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## **Workplace Behavior and Equal Employment Opportunities**

INTEGRIS is committed to a work environment that respects the rights, dignity and cultural differences of its patients and Affiliates. INTEGRIS anticipates and expects that all Affiliates will conduct themselves in a professional manner while on INTEGRIS' premises and at any time or location while engaged in activities related to INTEGRIS

INTEGRIS considers unacceptable and will not tolerate harassing behaviors. Harassment occurs when (1) the affiliation is, or seems to be, conditioned upon submission to the unwelcome conduct; (2) how an Affiliate responds to the unwelcome conduct is used as a basis for employment or contractual decisions; or (3) the conduct creates an intimidating, offensive, or hostile environment that interferes with work performance. Harassing behavior can include, among other types of behavior, inappropriate verbal conduct, such as racial epithets or sexual innuendoes; the display of inappropriate materials or use of inappropriate gestures; transmitting sexually-

suggestive, derogatory, or offensive materials via INTEGRIS' computers or accessing such information on the Internet while at work; assault, unwanted physical contact, coerced sexual conduct, touching, patting or pinching; or threats and demands to submit to sexual requests.

Harassment or any other form of physical, mental or verbal abuse or disruptive behavior is inappropriate and will not be tolerated. Anyone who believes he or she has been unlawfully harassed should promptly report the facts of the incident to a supervisor or to Human Resources.

INTEGRIS will not employ or contract with individuals or entities that: (1) have been excluded within the last five years from any federal health care program, including Medicare, Medicaid, CHAMPUS, maternal and child health block grants, social service block grants and other state funded health-care programs (the "programs"); (2) are owned or controlled by individuals who have been convicted, sanctioned and/or excluded from a program; (3) have been convicted of a criminal offense that would trigger exclusion from a program; or (4) are proposed for sanction by a program. Civil monetary penalties may be assessed against INTEGRIS for contracting with excluded individuals. All individuals or entities employed by or under contract with INTEGRIS must notify INTEGRIS of the occurrence of any of the actions listed above.

INTEGRIS is committed to fair and lawful human resources policies and practices in recruiting, hiring, evaluation, training, discipline, career development, compensation, promotion and termination. Discrimination of any sort, against any employee or applicant for employment, because of age, race, religion, sex, disability, service in the uniformed services, national origin, or other protected category, will not be tolerated

Questions to ask yourself: -----

1. Do I consistently respect the rights of those with whom I work?

2. Am I careful not to let differences in beliefs or background affect the work environment?
  3. Am I careful not to let what I say or do offend my co-workers or make them uncomfortable?
  4. Do I treat others the way I would like to be treated?
  5. Do I tell jokes or make comments that have direct or indirect sexual, ethnic, or other inappropriate overtones?
  6. Am I aware of any INTEGRIS employee or contractor who has been excluded from participation in any federal health care program? If so, did I report this to management?
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## **Safety, Health and Environmental Matters**

INTEGRIS seeks to provide a healthy and safe work environment. Supervisors must ensure that all employees and agents are properly trained in health and safety practices and precautions. Contractors, vendors and members of the medical and allied health staff must commit to following all safety, health and environmental policies while on INTEGRIS premises and in relation to all work with INTEGRIS.

INTEGRIS is committed to taking all reasonable steps to minimize the use and discharge of hazardous substances. INTEGRIS shall properly store and dispose of medical and clinical waste in accordance with INTEGRIS' environmental policies and legal standards designed to protect human health, the environment and the surrounding community.

INTEGRIS conducts and participates in a variety of research initiatives. INTEGRIS is committed to taking reasonable steps to assure that we comply with all federal and state laws, regulations and guidelines pertaining to scientific and clinical research.

Any involvement with illegal drugs or consumption of alcohol in the workplace by Affiliates is prohibited. Additionally, INTEGRIS supports a smoke-free environment inside and outside its premises. Anyone who violates drug and alcohol or smoking policies will be subject to disciplinary action in accordance with INTEGRIS policy.

Questions to ask yourself: -----

1. When I see an unsafe situation or act, do I take appropriate action to report or correct the situation?
  2. Am I careful in handling biohazardous materials according to policy?
  3. Do I ever work under the influence of alcohol or drugs that may impair my job performance?
  4. Am I refraining from smoking on INTEGRIS' premises?
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## **Marketing and Media Inquiries**

INTEGRIS' advertising must be truthful and not misleading. Any claims about INTEGRIS' services must be clearly supported by evidence to substantiate the claims made. All price advertising must accurately reflect the true charges for services.

INTEGRIS does not use advertisements or marketing programs that may cause confusion between our services and those of our competitors. False or misleading representations are not made to disparage the services or business of a competitor.

Because of the nature of our industry, we frequently receive requests from the media for information such as patient condition, and interviews with staff members, visitors or patients. All media requests should be handled in accordance with our policy for media inquiries. The unapproved release of sensitive information could violate applicable laws, and have a negative

effect on the customers we serve, as well as INTEGRIS' reputation and interests.

Questions to ask yourself: -----

1. Do I verify the accuracy of information before providing it to others for use in marketing?
  2. Am I careful not to discuss INTEGRIS business with members of the media unless directed to do so by the Corporate Communications department?
  3. Do I make sure any employees under my direct supervision are aware of and follow INTEGRIS' policies and procedures for dealing with media requests?
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## **Dealing with Government Officials and Regulatory Agencies**

Dealing with government officials is not the same as dealing with private parties. This is true whether the government is acting as a customer, payer, supplier or regulator. Always secure advice from Legal Services before entering into a contract with a government entity – to address any affirmative action requirements.

Do not give anything of value (such as a gift, hospitality or entertainment) that is in excess of the government's policy to an employee of a federal, state or local agency with which INTEGRIS is doing business or is seeking to do business.

Under the direction of Legal Services and the Chief Compliance Officer, we will cooperate with requests for information from government auditors, investigators or other officials. Any written documents, such as search warrants or subpoenas, should be immediately brought to the attention of Legal Services before any response is made.

Any Affiliate who is contacted by a government agent in connection with an INTEGRIS-related investigation or request for documents should immediately write down the agent's name, the name of the agency for which he or she works, the subject that he or she wants to discuss, and any other pertinent information. The Affiliate should also obtain the business card of the agent. The Affiliate should then contact INTEGRIS management, INTEGRIS Legal Services or the Chief Compliance Officer.

Questions to ask yourself: -----

1. Am I honest and forthright in my dealings with government officials and regulatory agencies?
2. Do I appropriately seek the advice from Legal Services before entering into contracts or dealing with investigations?

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## **Privacy and Security of Health Information**

INTEGRIS complies with all federal and state laws pertaining to patient privacy and security of health information. Patient medical information is confidential and should not be released without proper authorization as required by law and in accordance with INTEGRIS policies and procedures. Any concern regarding a potential privacy violation should be immediately reported to the Chief Compliance & Privacy Officer or through the Integrity Line.

Safeguards to protect health information include:

- Shred all documents containing patient information that are not part of the patient's permanent medical record. Do not throw confidential information in the regular trash.
- Follow the INTEGRIS policy when faxing information – always use an appropriate cover sheet that includes

required confidentiality language. Make sure fax machines are in a secure location.

- Do not leave copy machines unattended when copying patient information.
- Do not discuss patient information where others may hear such as in elevators, hallways, cafeteria, shuttle van, etc. If it is necessary for patient care purposes to engage in confidential conversations in an area where others may overhear, you should use reasonable precautions, including using lowered voices or talking apart from others when sharing protected health information. However, in an emergency situation, in a loud emergency room, or where a patient is hearing impaired, such precautions may not be practicable.
- Avoid e-mail for sending patient identifiable information. Follow INTEGRIS policy for use of e-mail.
- Do not share your computer password with others.
- Do not access or share patient medical information unless you have a legitimate reason to do so (treatment, payment or healthcare operational purposes).

Questions to ask yourself: -----

1. Do I take every reasonable step to protect patients' confidential information?
2. Do I follow INTEGRIS policies for faxing and e-mailing information?
3. Do I protect my computer password and not share it with others?
4. Am I aware of situations where patient confidentiality is not being maintained? Do I report this?

5. Do I access only patient information necessary for patient care purposes or to do my job?
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## **Integrity Line**

INTEGRIS has established an Integrity Line for Affiliates to report instances of suspected fraud, abuse, policy violation, unethical behavior or other compliance concerns. As an INTEGRIS Affiliate you have a responsibility to report such matters and may do so without fear you will be disciplined or retaliated against for doing so. No action will be taken against anyone who in good faith reports information to the Integrity Line.

The Integrity Line is run by an independent contractor (not affiliated with INTEGRIS) and is available 24 hours a day, seven days per week. Calls and emails to the Integrity Line are not recorded or traced. You may remain anonymous if you wish; however, you are encouraged to provide as much detailed information as possible so that an investigation can take place. Callers are given a unique identification number for reference should there be a need to provide additional information. Another feature of the Integrity Line is a confidential web-based reporting system that is accessible through the Corporate Compliance intranet website. Integrity Line reports are forwarded directly and confidentially to the Chief Compliance Officer.

We are responsible as an organization and as individuals to act in a legal and ethical manner. INTEGRIS' Corporate Compliance Program will be successful only if you do your part.

Please read this booklet and keep it in a secure place to refer back to when necessary. Please sign and return your completed compliance certification form as soon as possible.

## Disciplinary Action and Enforcement

INTEGRIS expects that you will comply with all INTEGRIS policies that are applicable to our relationship. INTEGRIS anticipates that you will review these policies and should you have any questions regarding your responsibilities to INTEGRIS under the policies that you will raise those questions with us before taking action. Should INTEGRIS determine that you have breached your responsibilities under relevant policies, INTEGRIS will take action, as appropriate given the nature and circumstances of our relationship, to remedy the violation and/or to terminate the relationship.

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## Related Policies and Procedures

**Please review the following INTEGRIS policies. This is not an exhaustive list. Other policies may also apply.**

### Corporate Compliance Program

- SYS-CMP-101 Corporate Compliance Program
- SYS-CMP-108 Non-Retaliation Policy

### Patient Care

- SYS-ETH-110 Patient's Bill of Rights
- SYS-ADM-112 Communications with Patients with Disabilities
- SYS-ADM-113 Communications with Limited English Proficient Patients
- SYS-ETH-102 Advance Directives for Healthcare
- SYS-ETH-103 Receiving and Responding to Patient Complaints and Grievances
- SYS-ETH-107 Ethics in Business Practices
- SYS-ETH-108 Nondiscrimination in Provision of Services
- SYS-ETH-109 Organizational Code of Ethics
- SYS-ETH-112 Patient's Rights to Make Healthcare Decisions

- SYS-IM-100 Information Security
- SYS-IM-101 Release of Information
- SYS-IM-112 Privacy of Health Information
- SYS-IM-113 Guidelines for Requests to Amend Protected Health Information
- SYS-LGL-111 EMTALA Requirements
- SYS-MED-101 Complaint and Conflict Resolution
- SYS-RCM-105 Charity Services
- SYS-RCM-101 Payment Plan

#### Billing and Coding

- SYS-CMP-104 Billing to Federal Health Care Programs
- SYS-CMP-105 Physician Order Requirements for Outpatient Services
- SYS-CMP-106 Medical Record Coding
- SYS-CMP-107 Investigational Devices and Procedures
- SYS-RCM-104 Coinsurance and Deductible Collection
- SYS-RCM-102 Uninsured Collection Program
- SYS-RCM-101 Payment Plan
- SYS-RCM-100 Charity Services
- SYS-RCM-110 Identity Theft Detection and Prevention
- SYS-RCM-126 Chargemaster Compliance

#### Proper Accounting and Recordkeeping

- SYS-LGL-109 Record Retention
- SYS-LGL-117 Preservation of Records for Legal Action
- SYS-FIN-306 Charge Reconciliation

#### Conflicts of Interest

- SYS-LGL-101 Board, Officers Conflict of Interest

#### Business Courtesies, Gifts and Customer/Supplier Relations

- SYS-MAT-101 General Purchasing Statement
- SYS-MAT-103 Competitive Bidding for Capital Improvements

- SYS-CMP-109 Non-Monetary Compensation and Incidental Benefits to Referring Physicians
- SYS-CMP-111 Employee Gifts
- SYS-LGL-105 Contract Review and Execution
- SYS-FIN-201 AP Guidelines
- SYS-FIN-110 Expense Reimbursement
- SYS-FIN-103 Overnight Travel Policy

#### Competition and Antitrust

- SYS-MAT-101 General Purchasing Statement
- SYS-MAT-103 Competitive Bidding for Capital Improvements
- SYS-FIN-106 Negotiation of Approval of Contracts with Third-Party Payers

#### System Property, Technology and Confidential Information

- SYS-ADM-109 Cellular Phone Usage

#### Workplace Behavior and Equal Employment Opportunities

- SYS-HR-213 Harassment
- SYS-MED-101 Complaint and Conflict Resolution
- MET-MED-120 Complaint and Conflict Resolution
- MET-HR-160 Dispute Resolution
- SYS-CMP-103 Employment of Excluded Individuals
- SYS-HR-204 Equal Employment Opportunity Policy

#### Safety, Health and Environmental Matters

- SYS-ADM-111 Tobacco Free Environment
- SYS-HR-609 Substance Abuse

#### Marketing and Media Inquiries

- SYS-PR-100 News Media Policy.

#### Dealing with Government Officials and Regulatory Agencies

- SYS-LGL-110 Search Warrant Guidelines
- SYS-LGL-105 Contract Review and Execution

Privacy and Security of Health Information

- SYS-IM-100 Information Security
- SYS-IM-101 Release of Information
- SYS-IM-106 Electronic Mail
- SYS-IM-107 Facsimile Transmission of Medical Records Information
  
- SYS-IM-112 Privacy
- SYS-IM-113 Guidelines for Requests to Amend Protected Health Information
  
- SYS-IM-118 Breach Notification
- SYS-IM-131 Social Media Policy
- SYS-RCM-110 Identity Theft Detection and Prevention

Integrity Line

- SYS-CMP-102 Integrity Line Policy

Disciplinary Action and Enforcement

- SYS-HR-122 Corrective Action Process

## Contact Resources

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**INTEGRITY LINE**

(888) 243-9597

**LEGAL SERVICES**

(405) 949-6026

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**COMPLIANCE OFFICE**

(405) 949-6081

**HUMAN RESOURCES**

(405) 949-4064

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**Code of Conduct  
Compliance Certification**

- 1. I have read the INTEGRIS Code of Conduct and have retained a copy for my guidance.
  
- 2. I understand the Code of Conduct, and I do and will conduct myself in complete compliance with its requirements with the following possible exceptions.\*

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I understand that it is my responsibility to bring known or potential violations of the Code of Conduct or applicable laws and regulations and/or any questions I have regarding proper application of applicable rules and regulations to the attention of the INTEGRIS Chief Compliance Officer, and that I will not be harassed or subject to adverse actions by INTEGRIS as a result of good faith reports or inquiries pursuant to the Corporate Compliance Program.

Name: \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Facility or Division: \_\_\_\_\_

(\*Include a statement concerning any personal business situation, conflict of interest, or other matter that you believe is or may involve a violation of, or prevent you from fully complying with, the Corporate Compliance Program or Code of Conduct.)

***Please sign and return your completed Compliance Certification form as soon as possible.***

**INTEGRIS**

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