

ORGANIZATIONAL INTEGRITY PROGRAM

Supporting Right Relationships – A Partnership with Our Medical Staff

As a member of the medical staff at Diley Ridge Medical Center, you serve as a trusted partner in the delivery of health care services to our community. Diley Ridge Medical Center has implemented the Organizational Integrity Program to ensure our operations are consistent with our Mission and Values and that we fully meet all applicable legal, ethical and professional standards.

This brochure provides information on our Organizational Integrity Program, our Standards of Conduct, and those areas that have particular application to our relationship with you as a member of the Medical Staff.

If you have any questions regarding this information, please contact your Medical Staff Office or your Local Integrity Officer. Contact information for these individuals is located on the back of this brochure.

The Organizational Integrity Program

The Organizational Integrity Program (OIP) provides policies, guidelines, education and tools to assist our associates and others who serve with us in understanding the various laws, regulations and professional standards that apply to our operations and in responding to issues and questions often encountered in the workplace. The OIP is not only concerned with complying with laws and regulations, but also emphasizes ethical behavior and actions consistent with the Diley Ridge Medical Center Mission. Basic principles such as treating others with respect and dignity, obeying the law and telling the truth, using good judgment, maintaining high ethical standards, and raising concerns when appropriate are the foundation upon which the OIP is based.

Diley Ridge Medical Center has a Local Integrity Officer (LIO). The LIO is responsible for the operation of the OIP within Diley Ridge Medical Center. It is very important for you to know the identity of this individual and how to contact him or her, if needed. Contact information for the LIO is located on the back of this brochure.

Ethical and Religious Directives

All physicians who are members of the Medical Staff of the Diley Ridge Medical Center are expected to familiarize themselves with the Ethical and Religious Directives for Catholic Health Care Services and to follow them when providing services in our facilities. Consult your organization's mission leader or medical staff office if you have questions or need further assistance.

The Standards of Conduct

All associates, contract workers, volunteers and board members of the Diley Ridge Medical Center receive a copy of the Standards of Conduct. The Standards of Conduct describes behaviors and conduct expected of all who work in the Diley Ridge Medical Center, including members of the Medical Staff. The Standards of Conduct are designed to support "Right Relationships", relationships with patients and

others in our care, relationships with co-workers, vendors, business partners and others that assist in the delivery of care, relationships with the government and others that pay for the health care services we provide, and relationships with our organizations and communities.

All who work in the Diley Ridge Medical Center, including members of the Medical Staff, are expected to:

- Deliver services with compassion, dignity and respect
- Maintain a positive, courteous and customer-serviced oriented attitude towards patients, their families, co-workers and others
- Speak kindly to patients, their families, co-workers and others
- Act in the best interests of patients and others in our care
- Respond timely to requests for information, input or assistance
- Communicate with others in a clear, open and honest manner
- Attempt to address differences 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 and others who serve with you. Report harassment, intimidation, or violence of any kind that you witness in our facilities
- Deliver services in accordance with all professional standards
- Maintain complete, accurate and timely medical records
- Protect the privacy and confidentiality of all medical and proprietary business information
- Respect the individual privacy of co-workers and others

Fraud and Abuse

Diley Ridge Medical Center and is subject to numerous laws and regulations that impact how we deliver health care services. Diley Ridge Medical Center is committed to fully complying with all laws and regulations that apply to our health care center.

All who work in Diley Ridge Medical Center, including members of the Medical Staff, are expected to follow all requirements of government (e.g. Medicare and Medicaid) and other third-party payers, such as commercial insurance companies. These requirements generally include maintaining complete and accurate medical records, and submitting only complete and accurate claims for services provided. Patient medical records, upon which such claims are submitted, must be complete and accurate, and conform to accepted professional standards for maintenance of such records.

You should also be aware that the offer or exchange of money, goods, or any other thing of value in return for the referral of patients is strictly prohibited by federal and state laws, and by Diley Ridge Medical Center policies. Likewise, the same laws generally prohibit enticing patients or other customers to use or purchase an item or service paid for by the Medicare or Medicaid programs by offering something of value to them.

Financial Relationships

Diley Ridge Medical Center is organized and operated exclusively for charitable purposes and to serve our community. As a result, Diley Ridge Medical Center has both an ethical and a legal obligation to operate in a manner consistent with our charitable purpose. You should be aware that tax regulations prohibit the improper use of Diley Ridge Medical Center assets to benefit individuals, including Medical Staff members, who are in a position to exercise significant influence over the business activities of the organization.

Financial transactions with Medical Staff members who refer patients to our facilities are subject to complex tax, and fraud and abuse laws and regulations. Diley Ridge Medical Center and have established certain policies and procedures to ensure all such transactions fully comply with applicable laws and regulations. These policies generally require that all financial arrangements be documented in writing, be at terms consistent with fair market value, be reviewed by approved legal counsel, and be approved by Diley Ridge Medical Center Board of Directors or approved committee of the board.

Conflicts of Interest

Conflicts of interest exist any time your activities or interests influence, or could appear to influence, your decision making related to your responsibilities as a Diley Ridge Medical Center Medical Staff member. Appearances count when dealing with potential conflicts of interest.

Examples of potential conflicts of interest include:

- Using your influence to recommend the selection of a vendor, contractor, product or supply with which you have a financial interest or other relationship without disclosing such relationship to the organization.
- Accepting gifts, monetary or in-kind, from a vendor or contractor as an inducement for you to use your influence or position on the Medical Staff as a basis for entering into a business relationship with the organization.

If you have any doubt whether a potential conflict of interest exists, treat the situation as if a conflict does exist until you have properly disclosed and resolved the matter through the LIO, Medical Staff Office, or other appropriate channel in your organization.

Respectful Work Environment

Diley Ridge Medical Center is committed to creating and maintaining a respectful work environment for all associates, caregivers, physicians and visitors. As a Diley Ridge Medical Center Medical Staff member, you should expect to be treated with respect. We also expect that you will treat everyone you encounter in our facilities with equal respect and fairness.

Associates, physicians and others who work in Diley Ridge Medical Center are not expected to tolerate disrespectful behavior in the workplace, including behavior that is rude, embarrassing, belittling, berating, threatening, intimidating, and/or insulting, or the use of loud, profane and abusive language in either public or private places. You are encouraged to report such behavior to your Medical Staff Office or one of the other resources listed on the back of this brochure.

Excluded Providers

As a recipient of funds from the Medicare and Medicaid programs, Diley Ridge Medical Center is prohibited from submitting any claim for services ordered, prescribed, or provided by individuals or organizations excluded from participation in federal health care programs.

As a member of the Medical Staff, you must attest that you have not been convicted of, or charged with, a criminal offense related to health care, nor have you been listed by a state or federal agency as debarred, excluded or otherwise ineligible for participation in state or federally funded health care programs.

If you are notified that you have been excluded from participation in state or federally funded health care programs, you must notify your Medical Staff Office or your Local Integrity Team immediately.

Where to Find Help

If you have a question or concern about possible violations of law, regulations, or the Code of Conduct, you are encouraged to seek answers by contacting one of the following resources:

- Your Site Administrator or Medical Staff Office
- Another member of the senior management team
- Your Local Integrity Team at 614-234-2191
- The Compliance Line at 1-866-477-4661

The Compliance Line is toll-free and staffed 24 hours a day, seven days a week by an outside organization on behalf of Trinity Health. Calls are not traced or recorded, and the Compliance Line does not use Caller ID.

Thank You!

We appreciate your taking time to review this information and your commitment to supporting Right Relationships at Diley Ridge Medical Center. If you would like to receive a copy of the complete Code of Conduct, or if you have questions about information included in this brochure, please contact one of the individuals listed below.

Your Local Integrity Team is:

Dan Hackett
General Counsel & Local Integrity Officer

Peggy O'Donovan
Integrity Team Leader

ADDENDUM

The False Claims Act

As a recipient of federal health care program funds, including Medicare and Medicaid, Trinity Health and Diley Ridge Medical Center are required by law to include in its policies and provide to all associates, agents and contractors, detailed information regarding the federal False Claims Act and applicable state civil and criminal laws intended to prevent and detect fraud, waste and abuse in federal health care programs.

What is the False Claims Act?

The False Claims Act is a federal law that makes it a crime for any person or organization to knowingly make a false record or file a false claim regarding any federal health care program, which includes any plan or program that provides health benefits, whether directly, through insurance, or otherwise, which is funded directly, in whole or in part, by the United States government or any state health care program. "Knowingly" includes having actual knowledge that a claim is false or acting with "reckless disregard" as to whether a claim is false. Examples of potential false claims include knowingly billing Medicare for services that were not provided, submitting inaccurate or misleading claims for actual services provided, or making false statements to obtain payment for services.

The False Claims Act contains provisions that allow individuals with original information concerning fraud involving government health care programs to file a lawsuit on behalf of the government and, if the lawsuit is successful, to receive a portion of recoveries received by the government.

State Laws

In most states it is a crime to obtain something (e.g., such as a Medicaid payment or benefit) based on false information. In addition to the federal law, several states (California, Indiana, and Michigan) have adopted similar laws allowing individuals to file a lawsuit in state court for false claims that were filed with the state for payment, such as the Medicaid program. While Ohio does not have a specific False Claims Act, the Ohio Revised Code (5111.03) addresses the penalties that a provider is subject to if they should submit a false claim to the Medicaid program.

Penalties for Violating the False Claims Act

There are significant penalties for violating the federal False Claims Act. Financial penalties to an organization that submits a false claim can total as much as three times the amount of the claim plus fines of \$5,500 - \$11,000 per claim. In addition to fines and penalties, the courts can impose criminal penalties against individuals and organizations for willful violations of the False Claims Act.

Protections Under the False Claims Act

The federal False Claims Act protects anyone who files a lawsuit under the Act from being fired, demoted, threatened or harassed by his or her employer as a result of filing a False Claims Act lawsuit. Ohio also has specific laws providing protections.

Our Commitment to Integrity

Diley Ridge Medical Center is committed to fully complying with all laws and regulations that apply to our health care center. We have established the Organizational Integrity Program (OIP) as evidence of our commitment to operating with the highest degree of integrity. The OIP includes the Standards of Conduct, policies and procedures, training and education, auditing and monitoring, and mechanisms for individuals to raise issues and concerns without fear of retaliation. Whether you are an associate, contract worker, volunteer, medical staff member, vendor or other business partner with Diley Ridge Medical Center, **you are reminded to:**

- Act with honesty and integrity in all of your business activities
- Follow all laws and regulations that apply to your work activities, including requirements of Medicare, Medicaid and other federal health care programs. These requirements generally include maintaining complete and accurate medical records, and submitting only complete and accurate claims for services provided
- Contact one of the following resources available within Trinity Health or Diley Ridge Medical Center if you have knowledge or concern regarding a potential false claim:
 - Your Integrity Team Leader: 614-234-2191.
 - The Integrity Line: 1-866-477-4661.
- The Integrity Line is staffed 24 hours a day, seven days a week by an outside organization. You may choose to remain anonymous when filing a report.
 - You may also file a report online at www.mycompliancereport.com. When prompted for an access ID, please use THO.

Diley Ridge Medical Center 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 termination of the business relationship with Diley Ridge Medical Center.

Please contact your Local Integrity Officer using the information above if you have any questions. Thank you for your commitment to operating with integrity and the highest standards of ethical behavior.