

## Mission

Why we exist:

To improve lives and build stronger communities through better health

## Vision

What we aspire to be:

To be the health partner of choice



visit us at  
[memorial.health](http://memorial.health)



# Code of Conduct

for colleagues of Memorial Health

Memorial Health is committed to the highest ethical standards in its business and operational practices. Memorial Health is committed to full compliance with all federal and state laws, regulations and programs. The Memorial Health board oversees the Compliance and Audit Program.

All Memorial Health personnel, regardless of rank or position, have a duty to perform with the highest ethical standards and are required to follow all federal and state healthcare program requirements, all Memorial Health policies and procedures and the code of conduct.

The failure of any Memorial Health personnel to comply with or report noncompliance with any federal or state healthcare program requirements, Memorial Health policies or procedures and/or the code of conduct will result in an immediate investigation, which may lead to disciplinary action up to and including termination.

## Purpose

The code of conduct is a guideline, or road map, for all Memorial Health personnel to follow while conducting business on behalf of Memorial Health. We are committed to "doing the right thing." However, no code of conduct can substitute for good judgment, common sense and personal integrity.

## Responsible Parties

The code of conduct applies to all Memorial Health corporations, trustees, colleagues and persons who act for Memorial Health, including physicians with admitting privileges, and those who are informed of this code of conduct.

Each responsible party must sign a certification statement that he or she has received and thoroughly reviewed the code of conduct at the time of employment and annually. In addition, each of the responsible parties is subject to surprise audits to monitor compliance.

All Memorial Health personnel and affiliated professionals, while carrying out their daily jobs and duties, will adhere to the following compliance standards.

## Compliance with Laws and Regulations

Memorial Health is committed to full compliance with all federal and state healthcare program laws and requirements, including the preparation and submission of accurate claims consistent with such requirements.

You must know and follow the legal, professional and ethical standards that apply to your work, including any ethical standards dictated by your professional organization. In addition, you must avoid conduct that appears to be, or is, improper.

It is illegal for any representative of the organization to offer or accept a bribe, kickback or any form of gift that may influence patient referrals or the manner in which we provide healthcare to our patients. Refuse gifts if you believe you may feel obligated to the person or organization giving the gifts to you.

Memorial Health does not employ or contract with persons or entities that are currently excluded or ineligible to participate in federal and state healthcare programs, suspended or debarred from federal and state government contracts, or have been convicted of a criminal offense related to the provision of healthcare items or services and have not been reinstated in a federal healthcare program.

## Billing, Coding and Cost Reports

Memorial Health personnel are prohibited from knowingly sending or causing to be sent claims for payment or approval that are false, untrue or illegal.

Memorial Health maintains fair business practices in patient billing, charging for services provided and any decision-making associated with patient accounts.

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## Confidentiality, Privacy and Security

Memorial Health shall maintain the confidentiality, availability and integrity of all information (clinical and business) created, generated and contained in our computer systems. No one may intentionally alter or falsify information on any record or document.

It is essential that each colleague protects our computer systems and the information contained in them by not sharing passwords and by following information security policies and guidelines.

Consistent with HIPAA, Memorial Health does not use, disclose or discuss patient-specific information with others unless it is necessary to serve the patient or required by law.

## Ensuring Quality and Patients' Rights

To the extent that this code pertains to patient care, it serves only as a guideline and does not substitute for professional medical judgment consistent with applicable standards of care.

Memorial Health is committed to providing healthcare services at a level of excellence that makes Memorial Health the healthcare provider of choice. You must be aware of the legal, professional and ethical standards, and the Memorial Health policies that apply to patient care activities.

Memorial Health assures patient involvement in all aspects of care. Informed consent is obtained for treatment, and authorizations are obtained for the release of protected health information as stated in HIPAA.

Memorial Health practices a non-discriminatory policy in admissions for inpatient, outpatient and emergency care. We adhere to regulatory and fair standards of practice in our admission and transfer policies by prioritizing the best interest of our patients. Memorial Health patients shall be treated in a manner that preserves their dignity, autonomy, self-esteem, civil rights and involvement in their own care.

## Confidential Disclosure and Non-Retaliation

All Memorial Health personnel have an obligation to report incidents that they believe may be in violation of federal or state healthcare program requirements, Memorial Health policies and procedures or the code of conduct.

Memorial Health has established a confidential disclosure program that allows Memorial Health personnel to report any concerns associated with conduct that Memorial Health personnel believe to be a potential violation of criminal, civil or administrative law, Memorial Health policies and procedures or this code of conduct. Memorial Health is committed to maintaining confidentiality, as appropriate under the conditions and the law, with respect to all Memorial Health personnel who make such disclosures, and will not retaliate against Memorial Health personnel for making any such disclosures. All reports of concerns and questions about compliance will be investigated by the corporate compliance officer and/or by Memorial Health legal counsel.

Colleagues and representatives are directed and encouraged to follow their chain of command with all human resources issues. If the colleague does not feel comfortable with their immediate supervisor, he or she may speak directly with the department director, a representative of Human Resources, a vice president, your affiliate's compliance liaison, Memorial Health chief compliance officer, the Memorial Health privacy officer or the Memorial Health information security officer.

## Conflict of Interest

A conflict of interest can arise from any situation where your personal interest differs from the best interest of Memorial Health. Any opportunity for personal gain (other than normal wages) could present a conflict of interest.

## Human Resources

Memorial Health is committed to providing an environment that protects and supports all colleagues as well as helping them to achieve their fullest potential in a fair and equitable manner.

We do not discriminate against any applicant or colleague based on race, creed, color, religion, sex, national origin, age, handicap, veteran status or other legally prohibited basis. In addition, we will not tolerate any form of sexual or racial harassment in the workplace.

We recruit, select, orient, educate and evaluate each colleague to ensure competency based on identified job descriptions. We support and empower our colleagues in the delivery of care.

**Anonymous Compliance Hotline**  
800-541-9331

**Compliance Officer**  
217-788-4311  
CompliancePrivacyOfficer@mhsil.com

**Privacy Officer**  
217-757-7526  
CompliancePrivacyOfficer@mhsil.com

**Information Security Officer**  
217-588-2774  
CompliancePrivacyOfficer@mhsil.com

## Code of Conduct Certification

Please fill out this panel, sign and return to Human Resources.

I have received, read, understood and shall abide by the Memorial Health code of conduct.

I understand that I have a duty to report any alleged or suspected violation of the code of conduct.

I understand that if I have a question about the code of conduct, I am to ask my supervisor, director, the compliance liaison, the Memorial Health compliance officer or the Memorial Health privacy officer.

I understand that a violation of any sections of the code of conduct may result in disciplinary actions, up to and including termination, as stated in the human resources policies.

Signature

Date

Printed name

Title

Colleague number or Social Security number

Department

Facility