PROMOTING A

Culture of Compliance

CODE OF ETHICS
& BUSINESS CONDUCT
Our commitment to ethical conduct and compliance depends on all PMC care partners. If you find yourself in an ethical dilemma or suspect inappropriate or illegal conduct, use the reporting process in this Code, including calling the Compliance Hotline at 888-447-8653 or reporting online at parrishmed.ethicspoint.com. Reporting may be done anonymously.

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Parrish Medical Center Care Partners,

Thanks to the continued efforts of Parrish Medical Center care partners (employees, physicians and volunteers), we have provided service to our community since 1958, and we look forward to many more. **Caring is at the core of who we are and what we do.** As caregivers to the most frail in our community, PMC’s focus is on quality care, a healing environment, effective use of resources, and compliance with applicable laws and ethical standards.

To continue to be successful in the ever-changing and increasingly complex health care environment, we must manage our health system responsibly and in compliance with all applicable laws. Furthermore, we must hold ourselves to high standards of integrity in all that we do. Our community expects no less.

Our Code of Conduct, mission, vision, values, and PMC’s Policies and Procedures work together to provide guidance on how we should approach our work and operate with integrity. Our Code is not a prescription, but rather a framework for operating with integrity.

Of course, no compliance program is perfect. In organizations as complex as ours, some care partners may run afoul of the rules, often unintentionally. Our objective is to have a compliance system and culture that prevents such issues from arising. Big problems usually start small, but we can avert them if we identify and address them promptly and effectively when they do occur.

Our commitment to compliance means that we all understand our obligation to prevent issues of noncompliance. All of us have a duty to seek guidance when we are unsure about the right course of action, and to speak up when someone is not acting in compliance with our Code, policies or government regulations.

We are all accountable for upholding our Code’s principles. It applies equally to each of us, regardless of position. We should take pride in our conduct and never compromise our integrity.

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**Mission**  Healing Experiences For Everyone All The Time®

**Vision**  Healing Families—Healing Communities®

**Values**  Safety • Loyalty • Integrity • Compassion • Excellence • Stewardship

Parrish Medical Center’s values are fully defined on iCare (for employees), and the PMC website: parrishmed.com.
COMPLIANCE AND BUSINESS ETHICS

Parrish Medical Center (PMC) established The Compliance and Ethics Program (Compliance Program) to reinforce our commitment to conduct business with integrity. People with integrity are honest, sincere, ethical, and act within legal boundaries at all times.

The Board of Directors supports the Code of Ethics and Business Conduct—PMC’s formal statement of standards and rules of ethics and conduct. The Compliance Program gives PMC a way to communicate standards of ethical conduct to its care partners, vendors and the community it serves.

PMC’s Compliance Office

The Chief Compliance Officer administers PMC’s Compliance Program. The Compliance Officer teams with department leaders and appropriate committees to ensure compliance with complex regulatory requirements.

The Compliance Office is available to receive all reports of suspected violations of PMC’s policies, applicable laws and regulations. Suspected violations reported to the Compliance Office, either directly or through the Compliance Hotline, are thoroughly investigated.

Application of Our Ethical Standards

The number of guidelines PMC must follow is staggering. The fact that there are so many guidelines to follow, however, does not lessen our commitment to follow them according to our ethical standards.

Care Partners Take Responsibility

As a care partner (employees, physicians and volunteers), you have a responsibility to yourself, your coworkers and PMC to conduct business legally and ethically. Make sure you read the Code and understand the rules that apply to you.

Leaders Have Greater Responsibility

Leaders set the tone for our ethical workplace. PMC looks to our leadership to set a good example and be familiar with the Code, the laws and policies that apply to your team. Leaders must ensure that ethical, compliant behavior is never sacrificed during the pursuit of business objectives.

As leaders, you have a responsibility to listen to your care partners, and promote an open dialogue about ethical and compliance issues. When ethical issues are brought to your attention, we rely on you to report concerns through the appropriate channel. You must never respond in a retaliatory manner. Never sacrifice ethical and compliant behavior in the pursuit of business objectives.
CODE OF ETHICS AND CONDUCT

PMC is committed to providing high-quality patient care in the communities we serve. PMC advocates a responsive management style and a patient-first philosophy based on integrity and competence. We treat our patients with respect and dignity. We provide quality, compassionate care in a clean, safe environment.

As part of PMC’s systemwide Compliance Program, our Code lays out the principles under which we operate, and helps us put policy into practice on the job every day. The Code sets forth guidelines needed to support compliance with federal health care program requirements as we provide high-quality patient care.

PMC’s compliance policies are in place to prevent unethical and unlawful behavior; to correct such behavior as soon as possible after it is discovered; and to discipline care partners who do not conform to the laws, regulations, policies or standards.

PMC’s policy is to obey the law. Health care is a heavily regulated business, and it is important to get the details right by following our policies and procedures. Our Code does not discuss every law or policy that applies to your work, but PMC wants you to have all the information you need to do your work fairly, honestly and ethically. If you have questions or need advice about a specific situation, talk to your supervisor, management or the Compliance office.

The Compliance Program and the Code apply to us all.

Compliance to regulations and policies is everyone’s responsibility. No person’s job or position at PMC is more important than preserving PMC’s reputation for integrity.

Care partners (employees, physicians and volunteers) are “the eyes and ears” of our Compliance Program. You are in the offices and on the floors; you see and hear what is going on. Care partners are held accountable to know enough about compliance to recognize an issue when it arises and report it.

Charitable Contributions and Gifts

PMC is a public organization governed by the Florida Code of Ethics for Public Officers and Employees. PMC care partners are prohibited from soliciting or accepting anything of value that might influence the care partners’ business judgment.

Gifts or Gratuities from Businesses

Care partners must decline any offer that is intended to gain favor with vendors or physicians. Personal gifts of any kind from vendors are never acceptable under any circumstances, which includes gifts to immediate family members. Vendors who conduct business with PMC, or wish to conduct business with PMC, may not give care partners gifts of money. All monies and charitable contributions must be referred to the Jess Parrish Medical Foundation office. Infrequent gifts of a nominal value ($100 annually) and not solicited may be accepted. Examples of such gifts are modest meals shared with the department during the holiday season, or a vendor providing a modest onsite working meal when the vendor is providing a necessary business-related educational session. Keep in mind that such business courtesies must be reasonable in value and infrequent. Care partners are not allowed to solicit funding or accept funding to support any parties or similar functions that are not business related. When gifts or gratuities from businesses are unclear, seek clarification from your leadership or the Corporate Compliance office.

Subsidies from vendors may not be accepted directly or indirectly to pay for the cost of travel, lodging, or other personal expenses. It is acceptable for faculty at conferences or meetings to receive reimbursement for travel, lodging and meal expenses, as long as any reimbursement complies with PMC policy and state laws. Any stipend given by a vendor must be turned in to the Finance department.

Gifts from Patients

Patients who want to make a financial gift to PMC should be referred to the Jess Parrish Medical Foundation office. Patients may insist on making a personal gift to a care partner. Small gifts may be accepted and shared with coworkers (e.g., flowers or a box of candy). It is never allowed to accept money from patients.

Government Personnel

State, local and federal governments have strict rules describing government employees’ accepting gifts. To avoid confusion, PMC care partners will not give or offer to give gifts to government employees.

DEALING WITH VENDORS & REFERRING PROVIDERS

Dealing with product and service vendors, as well as referring providers, can pose ethical and legal problems. The following guidelines are intended to help care partners make ethical decisions in potentially difficult situations.
Kickbacks and Rebates: Care partners or their families must not receive personal kickbacks (benefits) or rebates as a result of the purchase or sale of goods or services at PMC. If a care partner or family member stands to gain personally from a transaction, that transaction is prohibited. Such practices are unethical and often illegal.

Reciprocity: There are times when PMC purchases goods or services from vendors who also buy goods or services from PMC. This practice is normal and acceptable, but any form of pressure is not. PMC care partners must never ask vendors to buy PMC products or services in order to become a PMC vendor.

CONFLICTS OF INTEREST

As members of the PMC family, we all have a responsibility to make business decisions and take actions that are in PMC’s best interest.

A conflict of interest can happen when you are involved in an activity that affects your loyalty to PMC or your objectivity in making decisions as a PMC care partner.

PMC care partners should avoid outside activities that conflict with their obligation to PMC or negatively impact PMC’s reputation in the community. Care partners who think they may have an actual or potential conflict of interest due to outside activities should submit a disclosure form to the Compliance office. Compliance will assess the disclosure and notify the care partner of the outcome and any actions that need to be taken.

Executive leadership, directors and care partners in designated departments are required to submit a completed disclosure form annually to the Compliance office.

All care partners must disclose actual or potential conflicts of interest to the Compliance office.

Common Potential Conflicts of Interest

A Second Job: A conflict of interest can arise if you own, work for or provide services to a business that is a PMC competitor, vendor or customer. A conflict of interest can also arise if you have outside employment that interferes with your ability to do your job here at PMC. Speak with your management before accepting outside employment.

A Financial Interest: Investing in a business that offers, manufactures or sells products or services that compete with or are similar to PMC can present a conflict of interest.

Supervising a Family Member or Partner: Decisions about hiring and promoting can become difficult if the person you supervise is a close relative or partner. Even if you work to remain objective in your business dealings, the fact that you share a personal relationship can create the appearance of a conflict of interest.

Public Service: Volunteering your time and talents to public service is encouraged. You should not use PMC’s name to further activities without appropriate approvals.

Serving on a Board of Directors or Community Board: Before agreeing to serve as a member on any board, care partners should make sure their commitment won’t interfere with their PMC job responsibilities. Don’t accept a board appointment for any corporation that supplies goods or services to PMC or purchases our products unless you obtain advance approval from the Compliance office.

Political Activities: Never make a contribution or payment on behalf of PMC, and don’t express your political views in such a way that others think you’re speaking on PMC’s behalf. Participation in political campaigns must be conducted on your personal time, using your personal resources.

Doing PMC Business with Friends and Family: A potential conflict can arise if a family member, partner, or close personal friend owns or works for a business that is a competitor, vendor or customer of PMC.

REQUESTS FOR INFORMATION

PMC’s policy is that care partners cooperate with government personnel who conduct audits and investigations. Government investigators have the right to contact you at work or at home for work-related issues. Immediately contact your supervisor, the Compliance office or administration at the start of any government investigation. Management will immediately contact the Compliance office upon any written or in-person government investigations.

FALSE CLAIMS ACT

PMC devotes many resources to preventing and correcting billing errors to Medicare, Medicaid and other payers. The federal government and the state of Florida have enacted False Claims Act laws making it illegal to knowingly or recklessly present a false claim to the government for payment of a claim. The government has enacted laws to aggressively pursue billings that are fraud, waste and abuse. Care partners who suspect that billing errors are occurring have an obligation to report these to management or the
Compliance Office. Care partners who report, in good faith, compliance concerns will be protected from retaliation.

CONFIDENTIALITY

Care Partners have access to various forms of sensitive, confidential and proprietary information. Federal laws, Florida laws and PMC policies forbid you to seek, disclose or give unauthorized sensitive information that is not otherwise subject to disclosure under state laws.

PMC has a long-standing commitment to the principle and practice of maintaining the confidentiality of Protected Health Information (PHI). Maintaining PHI confidentiality is the responsibility of every PMC care partner. Use only the appropriate amount of necessary PHI to meet the legally intended purpose.

All care partners are required to know and comply with laws and policies about HIPAA (Health Information Portability and Accountability Act) privacy and security, and identity theft. Violations of these laws and policies will not be tolerated and are grounds for disciplinary action, up to and including termination of employment, criminal and professional sanctions per federal and state laws and PMC policies.

Go to PMC’s iCare (intranet) for further information, speak to your supervisor or contact Corporate Compliance.

CARE PARTNER IDENTITY THEFT

PMC has implemented an Identity Theft Program aimed to lessen the exposure of risk to our care partners’ collected and stored information. All care partners should do their part and keep private information private.

In the event that your identity has been compromised, PMC will assist you with any questions on reporting your unauthorized compromised identity. PMC will provide credit company surveillance for one year to monitor your credit.

We take identity theft seriously, and have zero tolerance for care partners violating someone’s personal information. Care partners who are found to have violated the identity of a fellow care partner will be disciplined accordingly, including termination and law enforcement notification.

Excellence:

“A journey that never ends.”

— Brian Tracy
Compliance – HIPAA Privacy – HIPAA Security

HOTLINE REPORTING

Know the Rules — Follow the Rules

Parrish Medical Center takes violations of laws and policies seriously. The following areas are covered under the Code of Ethics and Business Conduct.

Code of Ethics  Financial Reporting  Patient Privacy
Accounting  Gifts & Contributions  Payment Posting
Accounts Payable  Harassment  Purchasing
Billing  Identity Theft  Retaliation
Coding  Kickbacks  Safety & Hazards
Conflict of Interest  Misuse of Assets  Scope of Practice
Documentation  Patient Care & Rights  System Access
False Claims  Patient Charges  Vendor Relations

If you suspect unethical, illegal or irresponsible conduct...

REPORT SUSPECTED VIOLATIONS

24 hours a day, 7 days a week

(Retaliation for reporting is not tolerated)

Telephone (anonymously) 888-447-8653
Online (anonymously) parrishmed.ethicspoint.com

The hotline and online reporting portals are monitored by Navex Global, an independent ethics and compliance hotline agency. All concerns are forwarded to Corporate Compliance for confidential processing.

The hotline service is not intended to replace management or supervisor oversight. You may always report your concerns directly to your manager. Personnel issues may also be addressed to Corporate Services.

No Retaliation for Good Faith Reporting

Anyone who feels they have been retaliated against should report the specific retaliation immediately to the Compliance office or Corporate Services / Human Resources & People Excellence.
ACKNOWLEDGEMENT & ATTESTATION STATEMENT

I understand that I play a critical role in Parrish Medical Center’s mission and vision. I acknowledge that nonadherence to PMC’s principles and conduct may result in disciplinary action up to and including termination of my employment, consistent with PMC Code of Ethics and Business Conduct and Corporate Services / Human Resources policies.

I acknowledge that I have read the Code of Ethics and Business Conduct and hereby certify that I will be an advocate of PMC’s ethics and business conduct.

1. I will comply with applicable federal laws and regulations, state laws and regulations, and PMC’s standards and internal policies.

2. I will respect the confidentiality of information acquired in the course of my work, and will not use information belonging to PMC for personal gain.

3. I will act with honesty and integrity to avoid conflicts of interest in my personal and professional relationships that could have an impact on PMC. I will disclose to Corporate Compliance transactions that may potentially or actually be a conflict of interest.

4. I will proactively promote ethical behavior among my peers, patients and vendors.

5. I will, in good faith, promptly report violations or perceived violations of laws, regulations, standards, policies and procedures.

Print Name

Sign Name

Date

Please forward your signed statement to the Compliance office.
ADDITIONAL ATTESTATION STATEMENT
FOR DEPARTMENT HEADS

With leadership comes additional responsibility. While all care partners are expected to follow PMC’s Code of Ethics and Business Conduct, our leaders set the example for care partners to follow. In addition, our leaders should create an environment that encourages discussion of our ethical standards and values.

As a leader, I accept the responsibility to ensure:

1. My conduct is consistent with the highest ethical and legal standards.

2. My care partners are aware of the laws, rules, regulations and policies that apply to their jobs.

3. My care partners are aware of their obligation to report suspected violations of our standards.

4. My care partners have a work environment that is open and receptive to discussion and reporting of possible ethical violations.

5. I will take the appropriate action when a potential violation is reported to me.

6. I will prohibit retaliation against anyone who reports a potential violation to me.

7. I will protect the assets of Parrish Medical Center.

Print Name

Sign Name

Date

Please forward your signed statement to the Compliance office.
FREQUENTLY ASKED QUESTIONS

Q: Why do we need a Compliance and Ethics Program?
A: Fraud, waste and abuse in health care can result in criminal prosecution, civil liability and administrative fees. The Compliance and Ethics Program demonstrates PMC’s commitment to ethical behavior, and provides a means to discover mistakes early and correct them. PMC does not interpret honest mistakes as fraud.

Q: Why am I required to complete training on the Compliance and Ethics Program?
A: Compliance education is an important tool to help you become more aware of your personal responsibilities and accountability. The Compliance and Ethics Program defines proper conduct for doing business. The current health care environment is complex, and the Compliance and Ethics Program can help employees understand and comply with legal and ethical policies that will protect them and PMC.

Q: What happens if there is a suspected violation of the Code of Conduct?
A: The Compliance Office will investigate the suspected violation. Additional resources, such as Corporate Services / Human Resources, the privacy officer or security officer, may assist with the investigation.

Q: I receive my medical care at PMC. Is my medical record kept confidential?
A: Yes. PMC policy and the Code require all employees to respect the confidentiality of every patient and his or her information. Confidentiality standards are the same for all patients, no matter if they are a community member, employed by PMC, a volunteer or a vendor.

Q: I’m concerned about the health of a coworker and want to do what I can to help. Is it acceptable to look up my coworker’s medical record?
A: No. You may only access patient information as required for you to complete your work. Accessing patient information for any other reason may be grounds for discipline, up to and including termination.
Our commitment to ethical conduct and compliance depends on all PMC care partners. If you find yourself in an ethical dilemma or suspect inappropriate or illegal conduct, use the reporting process in this Code, including calling the Compliance Hotline at 888-447-8653 or reporting online at parrishmed.ethicspoint.com. Reporting may be done anonymously.

You may contact the PMC Chief Compliance Officer, Anual Jackson Sr., at 321-268-6835 or internally at ext. 6835, with any questions or for more information.

Go to iCare—PMC’s intranet—to review PMC Policies & Procedures, and to find Corporate Compliance information, such as the Hotline poster and this Code of Ethics and Business Conduct booklet in PDF format.