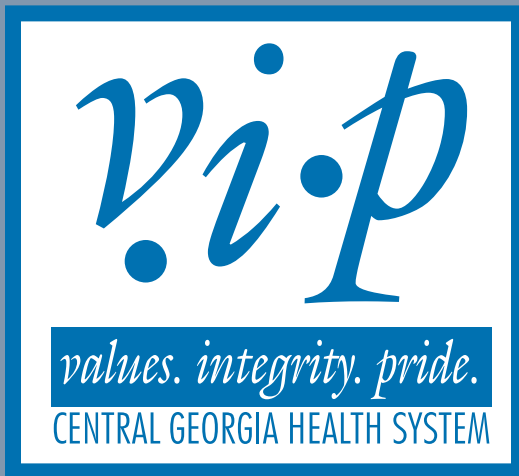


Central
Georgia
Health
System



CORPORATE COMPLIANCE STANDARDS OF CONDUCT

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Message From the President and Chief Executive Officer

As an important part of the Central Georgia Health System team, you represent the best in quality healthcare for our community. Still, we have even more to offer our patients, customers, physician partners, visitors and each other. That extra something special about Central Georgia Health System is our commitment to “V.I.P.” treatment. Values. Integrity. Pride: in every thing we do, every time we do it.

Central Georgia Health System, its affiliates and subsidiaries (“CGHS”) are dedicated to conducting business honestly and ethically wherever CGHS operates. To achieve this goal, we must be driven by our values and compliance with all policies, procedures, laws and regulations applicable to our healthcare environment.

Living up to this commitment has brought CGHS to set forth the principles and rules to be followed by employees and other individuals who work with CGHS. This handbook, based on our strong belief in the importance of integrity, will serve to familiarize new employees with the ethical standards which guide our business and patient relationships. For existing employees, it will reaffirm our commitment to ethical behavior in everything we do. Conduct in violation of these standards does not support our Vision, Mission

and MEDS—and may lead to serious consequences, including termination.

While this handbook cannot cover every situation you may encounter, we hope you will find it to be a useful resource tool in addressing issues that may arise during the course of your workday. When the best course of action is unclear, we urge you to seek the guidance of your manager, Human Resources or a member of the Corporate Compliance office. If you prefer, you may choose to call the CGHS Helpline to assist you in resolving your issue in a confidential manner. The Board of Directors of CGHS firmly supports our policy on non-retaliation, and you need not fear malicious action against you for reporting a concern in good faith.

As a CGHS employee, you have many reasons to take pride in your work and in your service to the community. Values. Integrity. Pride: just another example of how we stand above the rest. Remember, illegal or unethical conduct is never in the organization’s best interest or yours. Thank you for all you do in support of V.I.P. healthcare, the CGHS way.



A. Donald Faulk, Jr., FACHE
President and
Chief Executive Officer

Our Vision

To be a national leader in providing the safest, highest quality community-centered healthcare and wellness services through our highly skilled, diverse and valued work force to meet the changing needs of those we serve.

Our Mission

To enhance the health status of those we serve in partnership with medical staff and community organizations by providing wellness services, health education and training, and access to high quality healthcare.



Our People

We commit to value and support our employees.

Quality

We commit to continuously improve the quality of our services and outcomes.

Service Excellence

We commit to exceeding the expectations of our customers.

Safety

We commit to a safe environment for our staff, patients, & visitors.

Growth

We commit to build our services to meet the needs of our community.

Financial Performance

We commit to sound financial management.



Introduction

The Central Georgia Health System Standards of Conduct is designed to clearly institute policies addressing acceptable business practices for all employees, senior management, physicians and board members of Central Georgia Health System and its agents. As employees of Central Georgia Health System, we are committed to abiding by the laws and regulations governing our organization and to act honestly and ethically in all relationships.

It is the responsibility of every employee to conduct themselves in a manner that reflects the highest ethical standards and attests to our commitment to compliance with all applicable laws, regulations, company policies and procedures. Every person, working for or on behalf of Central Georgia Health System, has an obligation to be aware of the federal and state regulations as well as the organizational policies that govern their work. Since the Standards of Conduct cannot cover every situation you encounter, all CGHS employees have an obligation to seek answers or guidance when unsure about a course of action or if you are uncertain as to the appropriateness of a particular business practice.

Your Responsibility

You are responsible for:

- Assuring your actions meet the requirements set forth by the Central Georgia Health System Standards of Conduct.
 - Carrying out all job responsibilities in an ethical and professional manner.
 - Understanding CGHS values and asking questions whenever you have concerns about the ethical nature of a situation.
 - Reporting potential or suspected violations of CGHS standards and policies.
- All employees, senior management and agents of Central Georgia Health System and its subsidiaries will:
- Acknowledge receiving and agreeing to comply with the Standards of Conduct, understanding that violations will result in disciplinary action, up to and including termination.
 - Complete annual educational requirements on compliance issues.
 - Adhere to the Standards of Conduct as part of their annual performance evaluation.

Steps to Ethical Decision Making

When evaluating an uncertain situation, try asking yourself these questions:

- Could it violate any state or federal law or regulation?
- Does it violate the CGHS Standards of Conduct?
- Do I feel good about my decision or actions?
- Does it uphold CGHS Values?
- Does it seem fair and just?
- Would I feel proud for others to know?



Non-Retaliation Policy

The Board of Directors for Central Georgia Health System assures protection to all employees against any type of reprisal for good-faith reports of suspected or actual violations of our Standards of Conduct made to management, Human Resources, the Office of Corporate Compliance or the CGHS Helpline.

Human Resources

Our people are our most valuable assets. CGHS expects all employees to be on the job when scheduled and to be cooperative and helpful to patients, customers, visitors and each other, in accordance with Operation Excellence standards. Any behavior that might reflect adversely on CGHS or impair ability to perform job responsibilities is prohibited.

■ **Drugs, Narcotics and Alcohol—**

CGHS prohibits the use, sale, dispensing or possession of illegal drugs and narcotics by its employees, whether on or off CGHS premises. CGHS also prohibits the consumption of alcoholic beverages while on duty. CGHS may immediately discipline or discharge employees who violate this policy.

Any employee reporting to work or discovered at work in a condition that suggests he or she is under the influence of narcotics, drugs or alcohol will not be permitted to report to or remain on the job. The supervisor will escort the employee to the Human Resources department for consultation and possible testing.

Consistent with the overall mission of CGHS as a company, our Human Resources department can arrange for confidential counseling for drug or alcohol dependence problems. Human Resources may also make and coordinate

referrals for medical/psychological treatment and arrangements for leaves of absence.

In order to ensure the safety of all CGHS employees and patients, any employee who has been directed by a physician to take a prescription drug that may adversely affect or impair performance on the job must report that circumstance to the immediate supervisor. Reasonable accommodation will be made for employees suffering from any disability so long as the accommodation does not create an undue risk of harm to the employee, patients or others.

■ **Equal Employment Opportunities—**

In determining suitability for employment, promotions, transfers, demotions and wages, CGHS looks only at the individual's ability and willingness to perform the job. CGHS extends equal employment opportunities and freedom from harassment to all individuals, regardless of sex, race, age, color, religious beliefs, marital status, citizenship status, national origin or physical/mental disabilities.

CGHS expects everyone associated with CGHS to treat co-workers and patients with respect and courtesy. CGHS will not tolerate having its employees subject to discrimination or harassment based on any of the above

factors and will discipline or discharge those who violate this policy. Freedom from harassment specifically includes freedom from unwelcome sexual advances, requests for sexual favors or other verbal, graphic or physical conduct of a sexual nature.



Admissions and Treatment

Ethical relationships with our patients, customers and visitors are vitally important. Each and every CGHS employee will provide services that uphold the dignity, respect, self-esteem, individuality and rights of all patients and customers. Admission, transfer and discharges are conducted in an ethical manner and in accordance with applicable local, state and federal regulations and CGHS policies.

■ **Patients deserve to be treated at all times with dignity and respect** – Each patient is given a Bill of Rights upon admission and maintains those rights throughout treatment. Patient records are strictly confidential as required by law.

■ **CGHS only admits patients who need and will benefit from the treatment CGHS provides** – Standardized clinical admission criteria is used to determine whether or not to admit an individual. Only a physician or mental health professional makes that determination. CGHS does not

pay bonuses of any type to employees or other individuals working with CGHS in the intake/admission process based on the number of patients admitted or the length of the patients' stays. CGHS expects its presidents and division vice presidents to ensure that CGHS personnel and medical staff members never feel pressured to admit patients on any basis other than medical need.

■ **Each individual patient deserves to be treated as an individual** – CGHS professionals develop treatment plans to meet the specific clinical needs of every patient, utilizing a multi-disciplinary approach. Treatment is provided in the least restrictive environment appropriate to individual patient needs, such as inpatient care, partial hospitalization and outpatient care. CGHS is committed to creating a safe, compassionate treatment environment where patients and their families begin to understand their individual illnesses and start the recovery process.

Referrals

■ **CGHS treats patients, not insurance policies** – At the time of admission, information is provided on the anticipated treatment plan as well as financial and insurance information. Discharge planning begins at the time of admission and continues throughout the treatment process. The patient, patient’s family, 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 interaction with community organizations and support groups whenever possible. When patient care can be provided in either an inpatient or outpatient setting, CGHS complies with coverage guidelines set forth by the insurance companies of our patients. However, CGHS does not admit or discharge patients on the basis of their insurance policies and determines the level of care based on patient need and medical necessity.

■ **Assessments** – CGHS may provide or arrange for face-to-face assessments by qualified providers for individuals requesting such services. Assessments may be provided without charge to the individual. CGHS shall not inquire over the phone about the insurance status or ability to pay of any caller requesting assessment. The purpose of assessment is to recommend the most appropriate level of care to meet the individual’s clinical needs.

No employee shall solicit or receive, offer to pay or be paid for, remuneration of any type (including but not limited to bribes or kickbacks) in return for referring or recommending the referral of any individual to another person, hospital or medical facility for services or in return for the purchase of goods or services. Since there are numerous laws which clearly prohibit payment in return for referrals, every agreement involving compensation or cross referrals with a physician or other referral source must be reviewed by General Counsel prior to its execution.

■ **CGHS does not pay for referrals** – CGHS does not pay anyone—employees, physicians or mental health professionals—for referrals. CGHS only pays for services provided to the hospital and its patients. CGHS does not make payments or provide non-cash benefits (e.g. office space) to any health professional or physician providing services to the hospital without a written contract that has been approved through the corporate approval process.

■ **No employee shall offer or grant any benefit to a referring physician** – or other referral source on the condition that such physician or referral source refer or agree to refer any patients to the System. Physicians and healthcare professionals who are not employees of CGHS are free to

refer patients to any person or entity they deem appropriate. Where CGHS employees are in a position to make referrals, they shall make such referrals solely based on what is best for the individual seeking treatment and without regard to the number of referrals any physician or health professional has made to CGHS.

■ **CGHS does not pay patients** – CGHS does not waive insurance co-payments or otherwise provide financial benefits to patients in return for admissions. Under certain circumstances, CGHS may provide

appropriate financial accommodation (such as allowing monthly payments over time) to patients based purely on the financial need of the patient.



Compliance With Regulatory Requirements

The rules and regulations governing healthcare operations are often complex and, at times, may be difficult to understand. Some violations of healthcare laws and regulations can result in civil and criminal penalties. However, since ignorance of the law does not excuse CGHS or its employees from full compliance, it is our responsibility to seek answers promptly when questions arise.

■ **Regulatory Requirements Relating to the Provision of Healthcare Items and Services** – CGHS and its employees are subject to

numerous federal and state regulatory requirements relating to the provision of and reimbursement for healthcare services. CGHS employees are expected to be familiar with the applicable federal and state regulatory requirements and the penalties for the failure to comply with such requirements. Any questions regarding federal or state regulatory requirements should be directed to the Office of General Counsel or the Office of Corporate Compliance.

■ **Antitrust Laws** – CGHS policy is to fully comply with federal and state antitrust laws and regulations.

CGHS employees may not enter into agreements or understandings with a competitor that unlawfully limits or restricts competition. This policy applies, not only to express, formal and written agreements; but also to implied, informal and oral agreements as well. In addition, when purchasing goods or services for CGHS, employees may not enter into agreements or understandings that unlawfully limit or restrict CGHS purchasing decisions.

■ **Laws Relating to Tax-Exempt Status** – CGHS policy is to fully comply with all federal and state tax laws and regulations and to preserve the tax exempt status of CGHS. CGHS employees should avoid compensation arrangements or other transactions in excess of fair market value and any other activities that might jeopardize the tax exempt status of CGHS. All tax information and tax returns will be filed in accordance with applicable law.

Billing and Financial

CGHS bills only for services rendered. The billing process involves many employees in various areas: from the registration sites to the patient care areas, medical records personnel and the patient billing staff. Since billing is largely dependent on documentation of the care provided, caregivers must diligently work to assure the accuracy of any written documentation. Billing practices are based on our internal systems that ensure patients are billed only for services provided and must comply with billing requirements for government-sponsored programs like Medicare and Medicaid.

■ **Billing** – CGHS bills only for services rendered—nothing less and nothing more. CGHS must comply with special billing requirements for government-sponsored programs and

other payers, including private healthcare plans. All CGHS employees must exercise care in any written or oral statement made to any government agency or other payer. CGHS will not tolerate false statements by CGHS employees to a government agency or other payer. Deliberate mis-statements to government agencies or other payers may expose the employee involved to criminal penalties.

■ **Billing Requirements** – CGHS expects all employees involved in billing to be familiar with the applicable billing requirements under government programs and private healthcare plans. CGHS employees have an obligation to ensure that all bills submitted to patients, government programs and other payers, including private healthcare plans, are accurate and complete. All invoices,

bills, claims, records and reports submitted to patients, government programs and other payers in connection with requests for payment for healthcare services rendered should provide sufficient information and documentation to substantiate the particular healthcare service(s) rendered and the costs of such service(s). Any CGHS employee who discovers an error or inaccuracy in any claim for payment for healthcare services that has been submitted to a patient, government program or other payer should alert his or her supervisor immediately.

■ **Financial Reporting** – No code of conduct can review the extensive accounting and financial reporting requirements which CGHS must fulfill. To meet these obligations, therefore, CGHS must rely on employee truthfulness in accounting practices. CGHS' financial reporting system must contain accurate entries which reflect all CGHS financial transactions. There is no excuse for a false or misleading record or report. A false or misleading record or report involving time and attendance records, cash receipts and deposits, financial data, measurement data or other CGHS records is a serious offense.

Conflicts of Interest

Each CGHS employee has a duty of loyalty to CGHS. A conflict of interest may arise when personal interests influence, or reasonably appear to influence, judgment or ability to act in the best interests of CGHS. CGHS employees must avoid any actions that may involve, or appear to involve, a conflict of interest with their obligations to CGHS.

■ **Competitors** – CGHS employees should not engage in any management or development activity that aids a competitor of CGHS. It is understood that nursing staff, physicians and other healthcare professionals may provide routine technical services for other providers outside of CGHS as part of his or her livelihood. Generally,

however, we must not work for or assist anyone—including ourselves if self-employed—outside of CGHS in the planning, design, sales, purchase or any implementation of any service that CGHS currently provides or has known plans to provide. Any known or suspected conflicts or business relationships with competitors should be disclosed.

CGHS employees should not own stock in, serve as a director or officer of, receive compensation from, or provide consulting or other services to hospitals or firms in competition with CGHS in the healthcare industry without the written consent of the Office of General Counsel. However, CGHS employees may own less than one percent of the outstanding shares of any

class of equity security of a competitor or supplier listed on a national securities exchange or regularly traded in the over-the-counter market if the CGHS employee is not in a position to make or influence business decisions related to that competitor or supplier.

■ **Suppliers** – CGHS employees who deal with suppliers must do so in a reputable, professional and legal manner. Purchasing decisions will be made seeking the most technically efficient and cost-effective products and services, evaluated using consistent and unbiased standards. To avoid even the appearance of impropriety, CGHS employees should decline any gifts, including discounts, the acceptance of which would raise even the slightest doubt of improper influence. Discounts that are available to all CGHS employees and employees of other companies may be accepted. CGHS employees should decline any gifts of more than nominal value from present or prospective suppliers.

■ **Business Information** – CGHS employees may not use for their personal benefit any information about CGHS or information acquired as a result of the employee’s relationship with CGHS. Employees should disclose business information only as required in the performance of their job or as expressly authorized by CGHS. Violation of this policy may result in personal liability to the employee for any benefit gained from improper use of such information or any damages sustained by CGHS as a result of improper disclosure of such information.

■ **Outside Employment and Other Activities** – CGHS employees have a primary obligation to this organization, and any outside activity, such as a second job or self-employment, must be kept totally separate from employment with CGHS. Employees must avoid any activity that could adversely affect the independence or objectivity of our judgment, interfere with the timely and effective performance of our duties and responsibilities, or that could discredit, embarrass or conflict, or appear to conflict with the best interests of CGHS. Unless expressly authorized or sponsored by CGHS—such as certain forms of volunteer work—no outside activity should involve the use of CGHS time, its name or its influence, assets, funds, materials, facilities or the services of other employees.

■ **Disclosure of Possible Conflict of Interest** – Employees should disclose possible conflicts of interest involving themselves or their immediate families (spouse, parents, brothers, sisters and children) to the Office of General Counsel or the Office of Corporate Compliance. The Office of General Counsel will investigate and report possible conflicts to the Board of Directors. CGHS’ Board of Directors will determine whether significant conflicts of interest do occur and take the necessary steps to protect CGHS. When there is an inappropriate interest or relation, the matter will be discussed with the employee. Given the wide array of transactions throughout CGHS, it is expected that some employees

will have reportable interests or relations that are appropriate under the Standards of Conduct. For the protection of the employee and the organization, all such interests must be reviewed.

Employees who willfully fail to report interests or relations or make a false report are subject to disciplinary action, including possible termination of employment.



Marketing

Marketing practices at CGHS are conducted with truth, accuracy, fairness and responsibility to our patients and to the community. Any materials produced by CGHS shall reflect only those services available and may include levels of licensure and accreditation attained.

■ **All CGHS advertising must be truthful and not misleading** – Specific claims about the quality of CGHS' services must be supported by evidence to substantiate the claims made. All price advertising must accurately reflect the true charge for services provided to our patients.

■ **CGHS will forego any business which can only be obtained by improper and illegal means** – CGHS will not make any unethical or illegal

payments to anyone to induce the use of our services. A CGHS employee should never make a payment that, if it were publicly disclosed, would embarrass the employee or CGHS. CGHS will not offer, make, accept or receive payments or anything of value in order to obtain a competitive advantage with regard to contracts that involve the provision of healthcare services to Medicare or Medicaid beneficiaries. CGHS employees should contact CGHS' Office of Corporate Compliance immediately if unethical or illegal payments are requested or made.

■ **CGHS will comply with all state and federal requirements** – CGHS employees must submit all advertising and marketing materials to CGHS' corporate marketing department for approval before use.

■ **CGHS' best advertisement is CGHS itself** – CGHS does not use advertisements or marketing programs which might cause confusion between our services and those of our competitors. CGHS does not disparage the service or business of a competitor through the use of false or misleading representations.



Political Contributions and Communications

Payments of corporate funds to any political party, candidate or campaign inside or outside the United States are not permitted under the tax laws that govern CGHS as an exempt organization. Although employees are encouraged to participate freely and actively in the political process, CGHS employees should ensure that their political activities are in accordance with applicable laws and separate from CGHS.

■ **Political Activity** – CGHS employees are encouraged to participate in the political affairs of the community, state and country. CGHS supports the rights of its employees to stay informed on public issues and on the qualifications of candidates for public office. However, such activity must not interfere with the employee's ability to perform his or her duties at CGHS and must be consistent with governing laws, regulations and policies.

■ **Government Employees and Representatives** – To avoid the appearance of impropriety, CGHS will not provide any payment or reimbursement for expenses incurred by any government representative or employee. CGHS also will not provide gifts or payment of any kind to or on behalf of any government representative or employee. CGHS will not tolerate the making of such payments and will comply with all laws regarding political contributions and the participation of CGHS employees in political campaigns.

■ **Political Contributions** – CGHS will not contribute anything of value to any political party or candidate for public office in violation of the law. CGHS employees may not make any contribution, expenditure or payment to any political party or candidate in violation of the law. Contributions may be made to Political Action Committees to the

extent permitted by law. All contributions, even those consistent with applicable laws and regulations, must be approved in advance by the Office of Government Relations.

■ **Political Communications** – CGHS will communicate its views to

legislators, governmental agencies or the general public only in accordance with state and federal requirements. In many cases, the interests of CGHS will require timely and effective communication of its views on public issues and policies affecting CGHS, its business operations and its employees.

Government Inquiries

It is CGHS' policy to comply with the law and to cooperate with any government auditors and investigators in a reasonable and diligent manner. In so doing, however, it is essential that the legal rights of CGHS and of the personnel involved be protected. The law gives us all a right to be represented by legal counsel. If any employee, whether at home or at work, receives a government inquiry, subpoena or other official request for information regarding CGHS businesses, CGHS requests that the employee immediately notify his or her supervisor or CGHS' Office of General Counsel.

■ In light of the highly technical nature of government investigations, we believe CGHS should have legal representation at the earliest stage. Just as important, we believe employees are entitled to legal guidance before being subjected to government questioning.

While the decision about granting an interview is up to each employee, a CGHS attorney can assist the employee in scheduling and properly preparing for an interview, if the employee so desires. Also, when appropriate, CGHS may elect to pay the expense of a private lawyer to represent the employee individually (as permitted by applicable law).

■ Sometimes it is difficult to tell when a routine government inquiry, audit or review graduates into a more formal governmental investigation. CGHS relies on the common sense and alertness of its employees for making this important determination. In case of any doubt, employees should consult with CGHS' Office of General Counsel or the Office of Corporate Compliance.

Document Retention

In order to ensure that CGHS keeps only those documents required by law and necessary to its operations, CGHS employees should adhere to the following guidelines on document retention:

■ **Requirements of Government Programs and Other Third Party Payers** – CGHS complies with the document retention requirements of any state or federal government healthcare programs or other third party payers with regard to records relating to the provision of healthcare services to beneficiaries of government programs or healthcare reimbursement plans of third party payers.

■ **Requirements of State and Federal Law** – CGHS complies with the document retention requirements under state and federal law and regulations with regard to all medical, financial and administrative records concerning healthcare services.

■ **CGHS Document Retention Policies** – CGHS, from time to time, will establish internal document retention policies. Employees should retain records pursuant to these policies.

■ **Document Destruction** – No employee should ever destroy or alter any company documents in anticipation of a request for those documents from any government agency or court. If any employee believes that such conduct has occurred or may occur, the employee should contact CGHS' Office of Corporate Compliance at 691 Cherry Street, Suite 800, 478-633-6990, or the CGHS Helpline at 888-380-9008 immediately. Calls to the Helpline will be treated confidentially.



CGHS Helpline

One of the significant expectations communicated in the CGHS Standards of Conduct involves the principle of disclosure and reporting of activities. It is important to keep in mind that questions relating to business practices may be complex in nature. Since these questions may not have simple answers, we can best protect ourselves and CGHS if these issues are fully and completely analyzed in a timely manner. Therefore, as questions related to the application of our Standards of Conduct arise in daily operations, we should first discuss them with a supervisor or management.

In some situations, you may not feel comfortable raising questions with your supervisor. In order to provide employees with every avenue possible in which to voice their concerns, CGHS provides a Corporate Compliance Helpline (888-380-9008) for CGHS employees. Your call will be treated confidentially, and the CGHS Office of Corporate Compliance, assisted by the appropriate department, will investigate all calls. However, there may be a

point where the individual's identity may become known or may have to be revealed, by law, in certain instances when governmental authorities become involved. CGHS policy prohibits any employee from taking retribution against a Helpline caller.

It is the policy of Central Georgia Health System that no employee or agent will be retaliated against for providing information about non-compliance with any law.

It also is the policy of Central Georgia Health System that no employee shall be punished solely on the basis that he/she mistakenly reported what he/she reasonably believed to be an act of wrongdoing or a violation of the plan. However, an employee will be subject to disciplinary action if it is determined that the report of wrongdoing was knowingly fabricated by the employee or was knowingly distorted, exaggerated or minimized to either injure someone else or to protect him- or herself.



Phone Reference Guide

Central Georgia Health
System Helpline
Toll-free 888-380-9008

Corporate Office of Corporate
Compliance
478-633-6990 or
478-633-7736
fax: 478-633-5380

Corporate Office of General
Counsel (Legal Department)
478-633-6980

Corporate Audit Services
Department
478-633-6831

Corporate Human Resources
Department
478-633-7190

Corporate Marketing
Department
478-633-6952

Corporate Governmental
Affairs Department
478-633-6941

Risk Management Department
478-633-1280

*“Do the right thing
and avoid doing the
wrong thing, or doing
nothing ...”*

