

# GUIDE TO Employee Conduct



UnityPoint Health



*Best outcome every patient every time*

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**Although we cannot address in this Guide all the laws, regulations and policies that govern our organization, this booklet outlines many issues that will be important to you as an employee of Iowa Health System, d/b/a UnityPoint Health, or its affiliates.**

**This booklet does not replace any existing policies. It should be used to supplement and clarify our standards of employee conduct. Please consult with management or refer to our formal policies and procedures for more detail on specific issues.**

# President's Letter

## Dear UnityPoint Health employee:

UnityPoint Health's vision is 'Best outcome every patient every time.' Achieving that vision can only happen if we all believe this is why we work in health care. Our vision also can be achieved by understanding and living our Code of Conduct.

UnityPoint Health has established a Corporate Compliance Program which is founded on our Code of Conduct. The purpose of this program is to educate officers, directors, employees and agents of UnityPoint Health about the laws, regulations and standards governing the delivery of quality health care.

Please use this Guide to Employee Conduct in handling situations we encounter in our daily activities. And please familiarize yourself with the Code of Conduct. If any aspect of the Code or the Corporate Compliance Program is unclear to you, or if you have questions or concerns about a situation you are facing, please seek assistance.

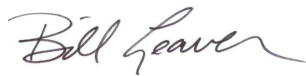
I hope you feel comfortable discussing your questions and concerns with your supervisor or senior management. If you

do not wish to do so, or if your supervisor/senior management is not able to address your issue, you may call the Compliance Helpline which is discussed in more detail in this booklet.

This booklet should help you achieve patient care and business objectives consistent with UnityPoint Health's commitment to ethical behavior and compliance with laws and regulations.

Our employees have helped us achieve our great reputation in health care through their involvement and creativity, and we want to count on your support.

Please help us deliver on our pledge to assure our patients and communities that UnityPoint Health has uncompromising values. Thank you for being part of the UnityPoint Health team.



**William B. Leaver**  
*President/CEO*  
*UnityPoint Health*

# Code of Conduct

## MISSION

*It is the mission of UnityPoint Health to improve the health of the people and communities we serve.*

## VISION

*Best outcome every patient every time.*

The UnityPoint Health Board of Directors has adopted a Code of Conduct to help us achieve excellence in our workplace. This Code of Conduct provides standards of conduct for our employees. It also will protect and promote organization-wide integrity and enhance our ability to achieve our mission and vision.

This booklet summarizes the standards outlined in the Code of Conduct. Please take time to familiarize yourself with the information in this booklet.

Our patients and their families, physicians, employees, and our communities and suppliers are the cornerstone of UnityPoint Health. Our relationships must be built upon honesty, credibility and mutual respect. It is our responsibility to observe all laws and regulations. We must be honest and forthright in our business dealings. Our integrity, both personal and professional, is our most important attribute.

# Statement of Risk Tolerance

Risk tolerance means the amount of risk that an organization is prepared to accept in pursuit of its objectives. A low level of risk tolerance means that the organization wishes to take very little risk. A higher level of risk tolerance means that the organization is prepared to accept more risk in order to achieve its objectives.

UnityPoint Health operates within a variable risk range, depending on the area and type of risk. UnityPoint Health's lowest risk tolerance relates to patient and employee safety and the quality of clinical care. Compliance risk evaluation requires a balancing of risk and cost. A higher risk tolerance may apply to financial and clinical data reporting objectives, and the greatest risk-taking tolerance may apply to the organization's strategic and operational objectives. This means that reducing to reasonably practicable levels the risks relating to the provision of healthcare services, our work environment, and material compliance risks, will normally take priority over other business objectives.

This statement of risk tolerance should be applied consistently at all levels of UnityPoint Health.

# Quality of Care and Clinical Values

**UnityPoint Health is judged by your performance, the attention and care you give, the courtesies you extend, the problems you solve and the quality of service you deliver. We will:**

1. Strive to provide high-quality medical services that are appropriate, safe and in compliance with all applicable laws, regulations and professional standards.
2. Treat patients with consideration and respect, recognizing their dignity and right to privacy. We will protect and keep confidential patient medical records and information as required by law.
3. Meet the health care needs of our patients regardless of age, disability, race, color, national origin, religion, sex, gender identity or sexual orientation.
4. Employ personnel with proper credentials, experience and expertise in meeting the needs of our patients and the communities we serve.
5. Strive to ensure that admissions, transfers and discharges are medically appropriate and in accordance with legal requirements.
6. Take reasonable precautions to ensure our safety, as well as the safety of our patients, visitors, and co-workers.
7. Communicate effectively with patients and families and respond to patients' treatment needs, requests and concerns. We will address any outcome of care, including unanticipated ones, by reporting these to a supervisor who can assess the problem and take appropriate action.
8. In the event of a medical emergency, not deny care and services on any other grounds unrelated to the individual's need for the service or the availability of the needed service.
9. Comply with all regulations governing the use, management and distribution of drugs. Report to work without being subject to the influence of alcohol, illegal drugs, prescription drugs used outside the scope of a prescription, or other substances that may hinder job performance or judgment.
10. Act in the best interests of our patients and maintain appropriate distance and involvement in our relationships with our patients.

# Legal Compliance

**UnityPoint Health will strive to ensure all activity by or on behalf of the organization is in compliance with applicable laws. Violations may result in severe penalties and significant fines. All Covered Persons must report any concerns about legal compliance to an appropriate supervisor, manager, Affiliate Compliance Officer, the UnityPoint Health Compliance Officer, or to the Compliance Helpline. We will:**

1. Operate in accordance with all applicable legal requirements.
2. Submit for reimbursement only those claims for services (a) that were rendered; (b) that were medically necessary; and (c) that were appropriately documented.
3. Use billing codes that accurately describe the services provided when submitting claims for payment.
4. Not provide discounts on charges for health care services provided to patients other than discounts that are permitted under UnityPoint Health policies.
5. Comply with Medicare and Medicaid billing and claims guidelines.
6. Take immediate steps to alert management if inaccuracies are discovered in claims that have been submitted for payment and reimbursement.
7. Comply with all IRS codes and regulations governing tax exempt organizations generally requiring transactions to be arms length, fair market value transactions. Refrain from activities that may generate private inurement (inappropriate benefit to individuals, such as providing below market interest rate loans to individuals, or paying physicians above market rates for services, or providing professional courtesy for hospital or physician services) and excess benefit (such as excessive compensation) issues.

*(continued...)*

## Legal Compliance *(continued)*

8. Be truthful and straightforward in all advertising and marketing activities.
9. Never make any false or intentionally misleading statements to a government agency or a payor.
10. Ensure that all required company data, reports and records are completely, accurately and truthfully filed with appropriate agencies.
11. Never solicit, receive, offer to give, or give anything of value to physicians, any health care provider or any other person for the referral of patients or services unless permitted by law and approved in advance by the UnityPoint Health Law Department. Abide by all Medicare fraud and abuse laws.
12. Pursue business opportunities or relationships that meet our ethical standards and comply with applicable laws and regulations.
13. Never accept or give bribes or kickbacks (i.e., cash or other consideration such as subsidies, discounts, medical directorships, supplies, or gifts) in connection with the referral of patients or acquisition of items for services unless permitted by law and approved in advance by the UnityPoint Health Law Department.
14. Never take actions that violate federal or state antitrust laws or are otherwise contrary to the laws that govern competitive practices in the marketplace. Employees should never discuss price or market information with anyone outside of UnityPoint Health unless they first consult with the UnityPoint Health Law Department.
15. Respect the rights and dignity of our employees. UnityPoint Health will not tolerate any form of abuse, harassment or intimidation in the workplace. Employees will be hired, promoted and compensated according to their qualifications, performance and potential. Harassment or illegal discrimination of any kind is unacceptable in our workplace.



# Business Ethics

**Integrity is a key principle for the selection and retention of those who represent UnityPoint Health. Physicians, agents, representatives and consultants must be informed of and comply with our policies and procedures. We will:**

1. Make business decisions (a) in an objective, unbiased manner; (b) free from improper influence or inappropriate conflicts of interest; and (c) that are in the best interests of UnityPoint Health.
2. Not offer any bribes, kickbacks or other inducements to any governmental or political official in return for political favors.
3. Not offer or accept any bribes, kickbacks or inducements in connection with performing duties for UnityPoint Health.
4. Comply with all relevant government requirements regarding record, document and data retention, including the confidentiality of medical records and other proprietary information. Never destroy any information that is the subject of a governmental investigation.
5. Maintain all company business data, records and reports completely, accurately and truthfully.
6. Properly and responsibly handle and dispose of hazardous substances and infectious waste in accordance with applicable laws and regulations.
7. Report personal relationships, romantic or otherwise, between two UnityPoint Health workforce members to supervisors and the appropriate Human Resources department to avoid the appearance of or an actual conflict of interest.
8. Ensure that all controlled substances and pharmaceuticals are properly stored, secured and inventoried. Missing supplies or drugs should be promptly reported to management.

*(continued...)*

# Business Ethics *(continued)*

9. Conform to the standards of our professions and exercise reasonable judgment and objectivity in the performance of our duties.
10. Treat all employees fairly and with dignity and respect.
11. Provide a safe and healthy work environment. We are all responsible for compliance with environmental, health and safety laws and regulations.
12. Report suspected violations of any law, regulation or policy to management. Retaliation against anyone who, in good faith, reports such violations will not be permitted.
13. Immediately inform a supervisor or the UnityPoint Health Law Department about any investigation, lawsuit or unusual request for information, especially if the contact occurs at home or after business hours. Do not respond to any subpoena or other such request for UnityPoint Health information without first obtaining the approval of the appropriate supervisor or the UnityPoint HealthLaw Department.

*“Compliance is about people doing things right and doing the right things.”*



# Business Relationships

**We expect our employees to pursue the best interests of UnityPoint Health and its affiliate hospitals, clinics, other related organizations, and the patients and communities we serve. We will not permit employees to engage in or pursue any personal interest that might conflict with the interests of UnityPoint Health. We will:**

1. Not enter into any business arrangement on behalf of UnityPoint Health with any family member, or any organization with which a family member is associated or has an ownership interest, without first informing your supervisor of the relationship in writing and, if requested, completing a Conflict of Interest Questionnaire.
2. Not use any information obtained as an employee or agent of UnityPoint Health for personal gain.
3. Accurately and truthfully present all statements, communications and representations to prospective partners or suppliers. All partners and suppliers will be treated uniformly and fairly.
4. Objectively and impartially weigh all facts and avoid the appearance of impropriety or favoritism when reviewing competing bids.
5. Not accept cash or cash equivalents from a non-UnityPoint Health person or entity.
6. Not accept from individuals, companies or representatives of companies having or seeking business relationships with UnityPoint Health, anything tangible (such as apparel or meals) if the value is more than \$50 per item or \$200 per year; or intangible items (like golfing fees or attendance at a special event) at reduced or no cost if the value is more than \$100. The receipt of these gifts or business courtesies must be reported to your supervisor and will be reviewed for appropriateness by management. Refer to UnityPoint Health Compliance Policy 1.CE.14, Gifts and Business Courtesies (on the Intranet [<http://intranet/>]) in the “Policies and Procedures” module).

# Protection of Assets

**UnityPoint Health, its employees and its agents will protect company assets and not use such assets for personal gain. They will:**

1. Be accountable for the proper expenditure of UnityPoint Health funds and for the proper use of its property.
2. Exercise reasonable judgment in the use of UnityPoint Health assets and funds relating to travel and entertainment expenses.
3. Use equipment in a safe manner and in conformance with operating instructions.
4. Protect the physical and intellectual property of UnityPoint Health and any assets entrusted to our care by others against loss, theft, destruction, misappropriation, and misuse.
5. Safeguard the property of employees, patients and their visitors.
6. Dispose of surplus, obsolete or unusable property only in accordance with established policies and procedures.
7. Never permit any unauthorized or inappropriate use of computer systems, software, office equipment, telephones, or other UnityPoint Health property.

# Responsibilities of Leaders

**UnityPoint Health expects that its leaders will be models for others within the organization in exhibiting behavior and ethics that comply with the standards set forth for all UnityPoint Health employees. Leaders at UnityPoint Health include board members, senior executives, medical staff leaders, directors, managers, and supervisors. Leaders at UnityPoint Health will:**

1. Lead change proactively.
2. Drive sustainable results by supporting and promoting financial viability through a culture of financial discipline and adoption of best practices in both critical patient care and business processes.
3. Use patient/customer-centered decision making and problem solving.
4. Be engaging and inspiring.
5. Manage talent and establish a working environment in which all workforce members are encouraged to raise concerns and contribute ideas to achieve the organization's goals.
6. Focus on the team.
7. Conduct professional activities with honesty, integrity, respect, fairness, and good faith in a manner that will reflect well on the organization.
8. Create a culture within the organization of high ethical standards.
9. Respect the importance of compliance with legal requirements.
10. Not permit any abuse of power that compromises patients or any other persons served.
11. Hold those who report to them accountable for any behavior that does not meet UnityPoint Health principles and standards.

*(continued...)*

## Responsibilities of Leaders *(continued)*

12. Avoid improper exploitation of professional relationships for personal gain.
13. Properly disclose financial and other conflicts of interest.
14. Avoid participating in any activity that damages or demeans the credibility and reputation of UnityPoint Health in the communities it serves.
15. Demonstrate support and fiduciary duty for the organization's mission as a tax-exempt organization to provide community benefit through programs or activities that provide treatment and/or promote health and healing as a response to identified community needs.



# Making the Right Decision

**Integrity, common sense and sound judgment** are your best guides in determining the appropriateness of behavior and necessary course of action. However, if you find yourself in a situation where you are unsure, ask yourself a few simple questions:

- Are my actions legal?
- Am I being fair and honest?
- Is this in the best interest of UnityPoint Health and the patients we serve?
- Will my action stand the test of time?
- How will I feel about myself afterward?
- How would my words and actions look if reported in the newspaper?
- Will I sleep soundly tonight?
- What would I tell my child to do?

**You should carefully examine your conscience when you think or hear. . .**

“It can’t hurt just this once.”

“No one will ever find out.”

“No one will care.”

“It sounds too good to be true.”

“Everyone does it.”

“We can bury it.”

“No one will get hurt.”

“What’s in it for me?”

“We never had this conversation.”

“You never heard me say that.”

# Violation of Laws, Regulations or Policy

**UnityPoint Health attaches the utmost importance to obeying the law and behaving correctly. UnityPoint Health will take disciplinary action, up to and including termination of employment, against any employee who engages in, causes, tolerates or condones any form of illegal or unethical conduct. Disciplinary action likewise will be taken against any employee who negligently fails to detect illegal or unethical conduct, whether by action or inaction, or who fails to report known wrongdoing.**

A federal law, the False Claims Act, provides serious penalties for health care providers who knowingly present a false or fraudulent claim to the government for payment, or knowingly use a false record or statement to get a claim paid by the government. Additionally, this law permits people to bring a claim against the provider, or wrongdoer, on behalf of the government. This law protects people who bring such a claim from discharge, demotion, suspension, threats, harassment, and discrimination. The person may be entitled to reinstatement with seniority, double back pay, interest on back pay, compensation for discriminatory treatment, reasonable attorneys' fees and other litigation costs.

Under Iowa law, an intentional false statement or misrepresentation of a material fact or omission of a material fact in an application for payment of services or merchandise rendered by a health care provider participating in the state medical assistance program constitutes a fraudulent practice. Any fraudulent practice, regardless of the amount of money or value of property or services involved, violates state law.

Illinois law also stipulates liability for false health care claims made to a contractor, grantee, or other recipient if the state provides any portion of the money/property requested. The Whistleblower Reward and Protection Act applies in the same circumstances as the federal False Claims Act, with additional provisions that apply when a



# Violation of Laws, Regulations or Policy *(continued)*

provider or individual knowingly takes adverse employment action against an employee for the disclosure of information reasonably believed to indicate a violation of State or federal law, rule or regulation; or when a provider or individual knowingly retaliates against an employee for the disclosure of information in court or during a hearing that is reasonably believed to indicate a violation of state or federal law, rule or regulation.

Similar to Iowa and Illinois, Wisconsin law also provides serious penalties for false claims against the Wisconsin Medicaid program, referred to as the Medical Assistance program, including knowingly presenting, or causing to be presented to the state a false claim for medical assistance, as well as knowingly making, using or causing to be made or used a false record or statement to obtain approval or payment of a false claim for medical assistance.

## Protection for Reporting of Workplace Concerns

**UnityPoint Health encourages employees to report any concerns about their work environment. Employee safety, patient safety, our health care operations, the employee's work area and safety, staffing, or other concerns related to safety or compliance are encouraged to be reported using the methods described under "Compliance Helpline" in this brochure.**

**No retaliation or disciplinary action of any kind will be taken against any employee for the good faith reporting of concerns about their work environment. If any retaliation occurs, that is a separate wrong, and the employee is requested to report the retaliation.**

# Compliance Helpline

**UnityPoint Health will not take disciplinary action or otherwise retaliate against any employee who, in good faith, reports a concern to management either directly or through the Compliance Helpline. Any and all forms of retaliation are prohibited, regardless of the source or type of retaliation. Further, some federal laws impose strict criminal penalties upon entities or persons who illegally retaliate against those who, in good faith, report wrongdoing. “Good faith” means that you reasonably believe that wrongdoing may have occurred.**

Employees are expected to report: (1) suspected illegal activity or fraud, waste and abuse; or (2) any retaliation for the reporting of suspected illegal activity or fraud, waste and abuse, through any of the following means:

- Your local supervisor or management
- Your local Compliance Officer
- UnityPoint Health Compliance Officer  
**(515) 241-4655**
- UnityPoint Health Audit Services  
**(515) 241-6120**
- UnityPoint Health General Counsel  
**(515) 241-4650**; or 24/7 pager  
**(515) 242-2227**
- Compliance Helpline  
**1 (800) 548-8778**

The Compliance Helpline is operated by an independent, outside service that permits your call to be anonymous, that is, you do not need to identify yourself.

# Compliance Helpline - *Continued*

## Iowa Employees

Employees may also disclose information about suspected wrongdoing in the administration of a service contract to an Iowa state agency that is administering a service contract that is the subject of the report to the Iowa Office of Citizen's Aide/Ombudsman at **(515) 281-3592**; to the Auditor of the State of Iowa at **(515) 281-5834**; or to the Iowa Attorney General at **(515) 281-5164**.

## Illinois Employees

To report Medicaid fraud, abuse or neglect, Illinois employees may call **1 (888) 557-9503**. To report health care abuse, Illinois employees may call the Department of Public Health at **1 (800-252-4343)**.

## Wisconsin Employees

To report Medicaid fraud and abuse, Wisconsin employees may call the Department of Health and Human Services Office of Inspector General's fraud hotline at **1 (877) 865-3432**. To report health care fraud and abuse, Wisconsin employees may call the Wisconsin Department of Justice at **(608) 266-1221**.

No disciplinary or adverse employment action will be taken against any employee who makes such a report.

For more information about our compliance program or to view our compliance policies, visit our Internet or Intranet websites (<http://www.unitypoint.org> or <http://intranet/>).

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