

Sharp HealthCare's 2014 Compliance Education Module 5

Compliance: Code of Conduct Certification



Sharp HealthCare's 2014 Compliance Education "Code of Conduct Certification"

In this module you will review a copy of Sharp HealthCare's
Code of Conduct.

You will also complete an attestation that you have reviewed
and agree to abide by Sharp's ***Code of Conduct.***

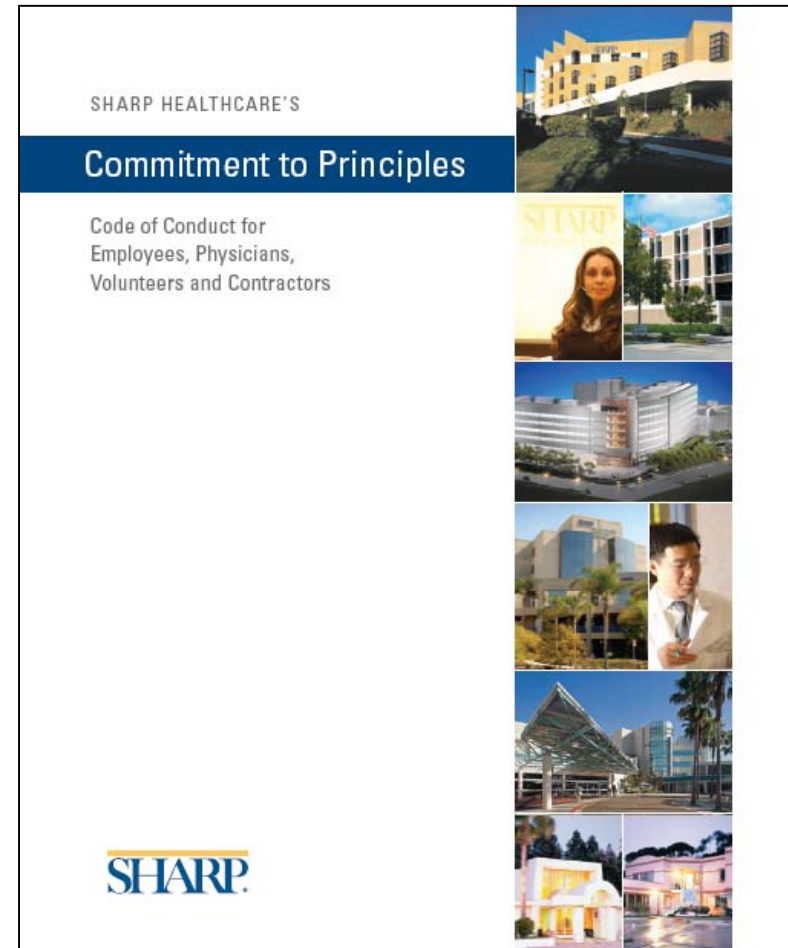


Learning Objectives

At the end of this course the learner will be able to review
a copy of Sharp HealthCare's ***Code of Conduct***.

Sharp HealthCare's Intranet

Sharp Healthcare's Code of Conduct, known as the ***Commitment to Principles***, is available for review in this module and on the Compliance home page on SharpNET.

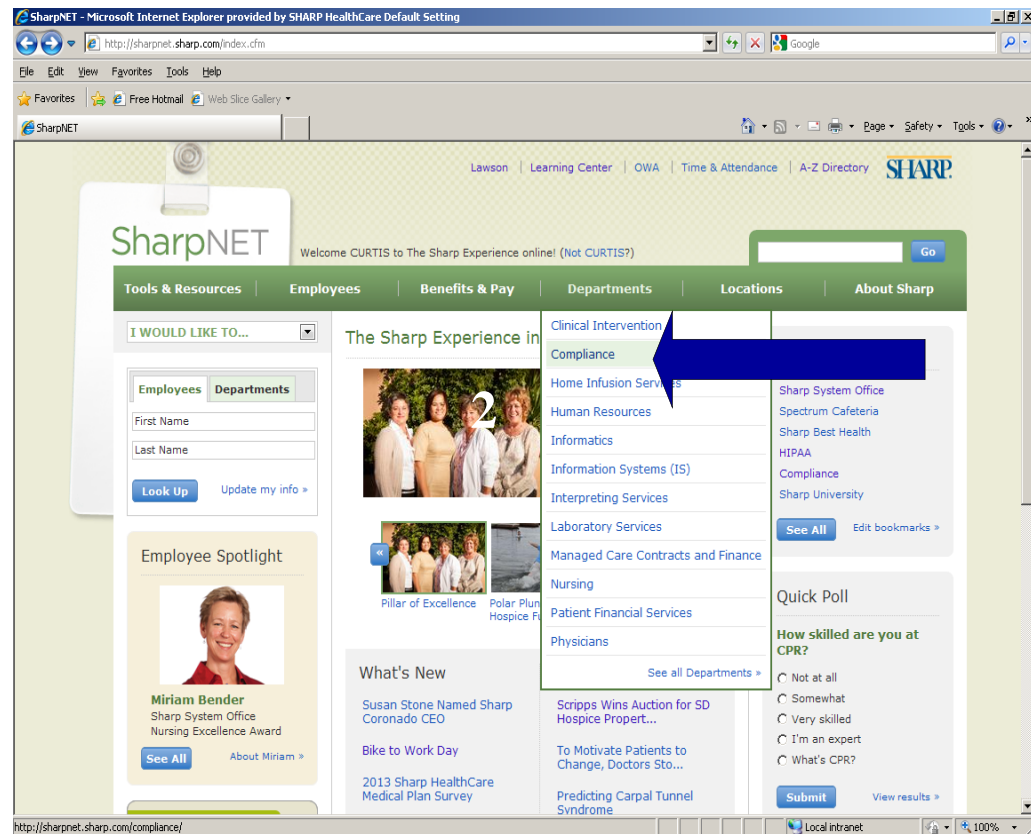


Sharp HealthCare's Intranet

Accessing the Commitment to Principles booklet from SharpNet is as easy as 1 2 3.

To access from SharpNET, click on the Departments tab on the top banner.

Then click the Compliance tab as shown at right.

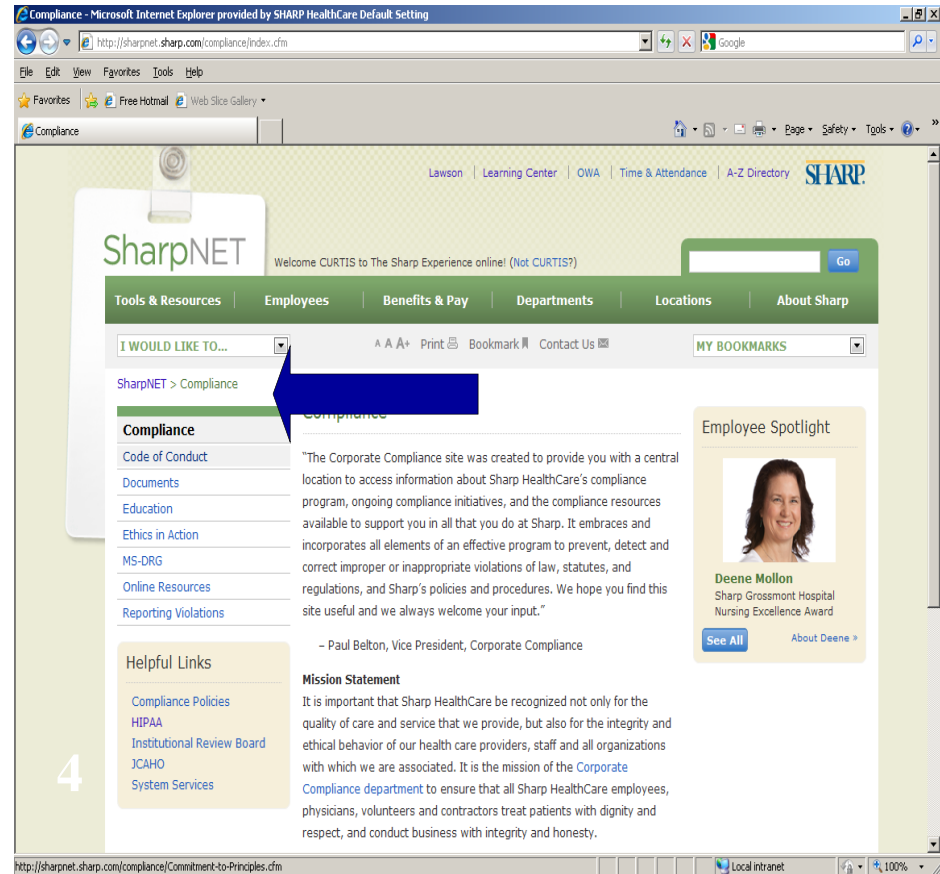


Sharp HealthCare's Intranet

Accessing the Commitment to Principles booklet from SharpNet

Click on the **Code of Conduct** tab.

Scroll down to the **Code of Conduct** link.

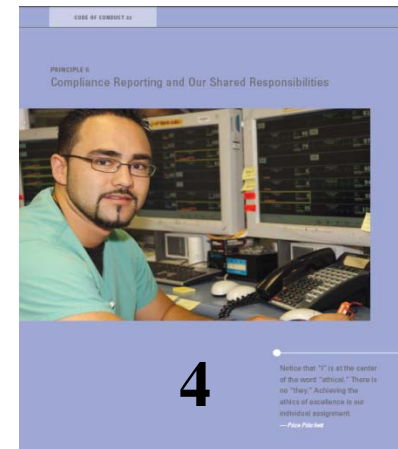
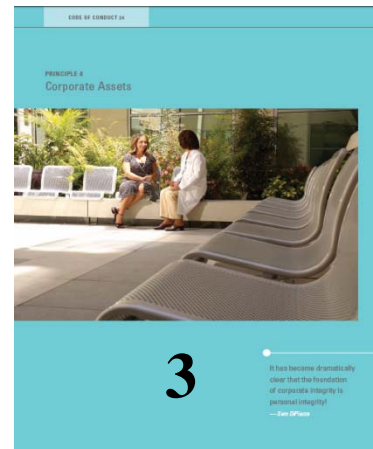
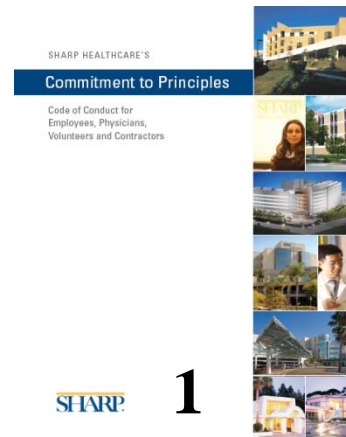


Making a Personal Copy

You may print out a copy of Sharp HealthCare's Code of Conduct, the ***Commitment to Principles***.

It is attached to this presentation.

From Sharp's Intranet, it is available in four sections for your convenience.



Code of Conduct Review

**Please carefully review the
next pages:**

**Sharp HealthCare's Code of
Conduct**

SHARP HEALTHCARE'S

Commitment to Principles

Code of Conduct for
Employees, Physicians,
Volunteers and Contractors



Throughout the community we serve, Sharp HealthCare is known for providing exceptional care. Sharp's reputation for integrity, honesty and doing the right thing is an intangible asset we all hold dear. Our reputation gives us credibility with our patients, and this creates value for our employees, physicians, volunteers and contractors.

As a health care organization, we operate in one of the most highly regulated environments in our country and have many rules and regulations that must be followed. These rules and regulations consist of not only federal and California guidelines, but Sharp's own policies and practices. Sharp goes above and beyond what most health care organizations do in our industry to help ensure we always do the right thing. Why? We do this for three reasons:

1. Patients place a great deal of trust in the hospitals, doctors and clinicians that work to treat and heal them.
2. Sharp employees, physicians, volunteers and contractors value Sharp's reputation.
3. We are committed to providing exceptional care to the San Diego community.

In order to achieve these goals and earn the trust of the people we serve, we have to deliver on our promises and commitments every day.

Sharp has had a code of conduct for many years. As Sharp continues to evolve, our code of conduct must also evolve to accurately reflect who we are and where we are going as an organization.

Sharp's Commitment to Principles provides an overview of our commitment to high ethical standards and outlines expectations that are intended to help all of us make the right choices and do the right thing. This document is not a comprehensive rule book, nor is it designed to address every situation we may encounter. It is meant to be a summary of our policies and practices intended to reinforce the spirit of our dedication to integrity, performance, innovation and people; as well as our commitment to be the best place to work, the best place to practice medicine and the best place to receive care.



Stephen P. Cushman

Stephen P. Cushman
Chairman of the Board
Sharp HealthCare



Michael W. Murphy

Michael W. Murphy
President and Chief Executive Officer
Sharp HealthCare



Paul R. Belton

Paul R. Belton
Vice President, Corporate Compliance
Sharp HealthCare

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Acknowledgment

If I have any concerns, questions or comments regarding the material in this booklet, I can contact:

1) my manager, **2)** the compliance liaison at my facility, **3)** another member of administration at my facility, **4)** the vice president of corporate compliance, or **5)** the Compliance Connection Hotline.

My Commitment to Sharp is Reflected in ...

My Values

Trust, integrity, accountability and commitments — values that are important to me personally and professionally. These principles apply to my family, friends, leaders and the organizations I choose to align myself with because they form the basis of interaction in virtually everything that I do. My individual values are directly in line with and support Sharp HealthCare's values: integrity, caring, innovation and excellence.

My Goals

I understand that Sharp's continuous goal is to create a working environment in which every employee lives Sharp's values every day. The Commitment to Principles contains commitments, values and principles that help further that goal. The Commitment to Principles also reflects how I can demonstrate these values in my relationships with patients, coworkers, the organization, the government, business partners, contractors, competitors and the community. My personal commitment to this goal contributes to making Sharp the best place to work, the best place to practice medicine, and the best place to receive care. I am Sharp HealthCare.

My Responsibilities

Every employee, physician, volunteer and contractor has a responsibility to read the Commitment to Principles and live by its values.

I am responsible for upholding Sharp's values in my everyday work — speaking up when I have a question or concern and reporting conduct that is inconsistent with those values. In addition to the values-based commitments in the Commitment to Principles, Sharp's policies and procedures provide additional guidance. I have a responsibility to be aware of and follow the policies and procedures related to my job. I can find these policies on SharpNET by typing in the keyword "compliance." If I need assistance finding a specific policy, I can contact my manager, Human Resources, or the Corporate Compliance Department for assistance.

We make a living by
what we get, we make
a life by what we give.

— *Sir Winston Churchill*



Sharp's Fundamental Commitments

TO OUR PATIENTS: We are committed to providing quality care that is sensitive, compassionate, promptly delivered and cost-effective. We treat all patients with respect, compassion and dignity.

TO OUR SHARP COLLEAGUES: We are committed to a culture which treats all colleagues with fairness, dignity, and respect, and affords them an opportunity to grow, develop professionally, and to work in a team environment in which all ideas are considered.

TO OUR PHYSICIANS: We are committed to providing a work environment which has excellent facilities, modern equipment, and outstanding professional support.

TO OUR THIRD-PARTY PAYERS: We are committed to dealing with our third-party payers in a way that demonstrates our commitment to contractual obligations and reflects our shared concern for quality health care and bringing efficiency and cost effectiveness to health care. We encourage each of our third-party payers to adopt their own set of comparable ethical principles to explicitly recognize their obligations to patients as well as the need for fairness in dealing with providers.

TO OUR REGULATORS: We are committed to an environment in which compliance with rules, regulations, and sound business practices is woven into our corporate culture. We accept the responsibility to aggressively self-govern and monitor compliance with the requirements of law and to the Commitment to Principles.

TO THE COMMUNITY WE SERVE: We are committed to understanding the particular needs of the San Diego community we serve and providing our community with quality, cost-effective health care. We realize as an organization that we have a responsibility to help those in need. We proudly support charitable contributions and events in an effort to promote good will and further charitable causes.

TO OUR SUPPLIERS/CONTRACTORS: We are committed to fair competition among prospective suppliers and the sense of responsibility required of a good customer. In addition to abiding by Sharp HealthCare's Code of Conduct, we encourage each of our suppliers to adopt their own set of comparable ethical principles.

TO OUR VOLUNTEERS: The concept of voluntary assistance to the needs of patients and their families, as well as to our Sharp colleagues, is an integral part of the culture of Sharp HealthCare. We are committed to ensuring that our volunteers feel a sense of pride in their volunteer work and receive recognition for their volunteer efforts.

Sharp HealthCare's Continuing Commitment to Compliance

OUR MISSION is to improve the health of those we serve with a commitment to excellence in all that we do.

OUR GOAL is to offer quality care and services that set community standards, exceed patients' expectations, and are provided in a caring, convenient, cost-effective and accessible manner.

OUR VISION is to be the best health care system in the universe. Sharp will attain this position by redefining the health care experience through a culture of caring, quality, service, innovation and excellence. Sharp will be recognized by patients, physicians, employees, volunteers and the community as:

- The best place to work
- The best place to practice medicine, and
- The best place to receive care



Do all the good you can, by all the means you can, in all the ways you can, in all the places you can, at all the times you can, to all the people you can, as long as ever you can.

— John Wesley

The Sharp Experience

At Sharp HealthCare, we are on an exciting journey, continuing to improve our organization's culture. It involves enhancing the way we interact with and serve our patients and their families, our physicians and our colleagues. We call this culture "The Sharp Experience" because it encompasses all that we do at Sharp HealthCare.

Sharp is transforming the health care experience in San Diego by being:

The best place to work

Attracting highly skilled and passionate staff members who are focused on providing quality health care and service and building a culture of teamwork, recognition, celebration and professional and personal growth — and who are committed to serving patients and supporting one another to make Sharp the best health care system in the universe.

The best place to practice medicine

Creating an environment in which physicians enjoy positive, collaborative relationships with nurses and other caregivers; experience unsurpassed service as a valued customer; receive access to state-of-the-art equipment and cutting-edge technology; and enjoy the camaraderie of the highest-caliber medical staff at San Diego's preeminent medical institution.

The best place to receive care

Providing a new standard of service in the health care industry — a truly different experience, much like that of a five-star hotel; employing service-oriented individuals who see it as their privilege to exceed the expectations of every patient by treating them with the utmost care, compassion and respect; and creating healing environments that are pleasant, soothing, safe, immaculate and easy to access and navigate.

The best health care system in the universe!

Ultimately, Sharp HealthCare's goal is to be the very best health care system in the universe.

As an excellent community citizen, Sharp is known as an organization of people working together to do the right thing every day to improve the health and well-being of those we serve.

VALUES:

Integrity – Trustworthiness, respect, commitment to organizational values, decision-making

Caring – Serving others, communication, teamwork, collaboration and celebration

Innovation – Creativity, continuous improvement, initiating breakthroughs, self-development

Excellence – Quality, safety, operational and service excellence, financial results, accountability

Sharp HealthCare Must-Haves

- Greet people with a smile and “Hello,” using their name when possible.
- Take people where they are going, rather than pointing or giving directions.
- Use key words at key times. “Is there anything else I can do for you? I have the time.”
- Foster an attitude of gratitude. Send thank-you notes to deserving employees.
- Round with reason to better connect with staff, patients, family and other customers.



Pillars of Excellence

The six pillars displayed below are a visible testament to my commitment to making Sharp the best health care system in the universe by achieving excellence in these areas:

Quality – Ensuring the highest-quality care and clinical outcomes

Service – Overall patient and physician satisfaction in Sharp hospitals and affiliated medical groups

People – Increasing employee satisfaction and retention and reducing employee turnover

Finance – Increasing available cash on hand to reinvest in operations, and reducing workers’ compensation claims

Growth – Increasing total net revenue to reinvest in operations

Community – Commitment by each Sharp manager to donate at least two hours of community service per month — a total of almost 60,000 hours annually toward community-service programs

I think one’s feelings waste themselves in words; they ought to be distilled into actions which bring results.

— Florence Nightingale

Our Behavior Standards

Attitude Is Everything

Create a Lasting Impression – We treat every customer as if he/she is the most important person in our workplace. Our behavior and attitude create a positive first impression that is lasting. We strive to exceed expectations.

Thank Somebody

Reward and Recognition – Reward and recognition are central to the Sharp culture. We express gratitude and appreciation to one another. We celebrate our accomplishments and hard work to make Sharp the best place to work, practice medicine and receive care.

Make Words Work

Talk, Listen and Learn – We communicate with courtesy, clarity and care in all verbal and non-verbal messages. We listen attentively to customers to understand their needs and to ensure they comprehend information we provide to them.

All for One, One for All

Teamwork – Sharp team members share a common purpose: to serve our customers. We build each other up; we share our successes, failures, information and ideas.

Make It Better

Service Recovery – When The Sharp Experience doesn't go right for a customer, we pledge to make things better. We listen and respond with empathy, and apologize for not exceeding expectations. We are proactive in making amends, even in difficult situations.

Three Steps to Service

Recovery: "ACT"

"A": Acknowledge and apologize

- 1) ACKNOWLEDGE that there is a problem. Validation goes a long way.
- 2) APOLOGIZE. Nothing soothes faster than saying, "I apologize."

"C": Correct

- 1) EMPATHIZE. Letting people know you understand how they feel is important. You can say something like, "That must have been frustrating for you."
- 2) MAKE IT RIGHT/COMPENSATION. Ask the person, "What can I do to help?"

"T": Take it forward

- 1) FOLLOW UP.
- 2) REFER to the supervisor and/or department as appropriate.

Think Safe, Be Safe

Safety at Work – It is essential that we provide a hospitable, healing, healthy and safe environment at Sharp HealthCare. We identify and report safety hazards promptly, and apply remedies whenever needed.

Look Sharp, Be Sharp

Appearance Speaks – When we dress, groom and maintain our workplace with care, we show respect for our customers and give them confidence in our ability to care for them.

Keep in Touch!

Ease Waiting Times – Keeping our customers informed puts them and their families at ease. We are committed to sharing information and acknowledging the presence of our customers at all times.

It's a Private Matter

Confidentiality – Sharp HealthCare protects customers' confidentiality, privacy and modesty in all situations. We are sensitive to the personal nature of health care, and we do everything we can to earn the trust that others place in us. We strive to promote peace of mind and relieve anxiety.

To "E" or Not to "E"

E-Mail Manners – Using e-mail may save the sender time, but may not always be the most appropriate or expedient way to communicate. Use discretion in sending, responding to and forwarding e-mail. Remember that electronic messages can be subpoenaed and used as evidence in legal proceedings.

Vive La Différence!

Diversity – At Sharp HealthCare, we know that our differences, unique talents and varied backgrounds come together to create a stronger whole.

Get Smart

Increasing Skills and Competence – Sharp HealthCare is committed to helping its employees, leaders and physicians learn and grow. Professional development demonstrates a desire to continually enhance the delivery of health care. We encourage innovation and constant improvement in efficiency and effectiveness.

PRINCIPLE 1

Quality of Care



● — Bettering the human condition is the greatest good any individual can achieve.

— Dr. Thomas F. Frist Sr.

As a Sharp HealthCare employee, I am committed to delivering quality care, services and products to our patients in a compassionate, respectful and efficient manner. At Sharp HealthCare, I treat everyone with respect and dignity. I will not compromise quality and will help Sharp remain a leader in providing innovative health care. I will recognize and adapt to change without losing sight of Sharp's mission.

Sharp HealthCare is committed to delivering the highest quality of patient care without regard to race, color, religion, gender, national origin, age, disability, sexual orientation, payer source or ability to pay. It is Sharp HealthCare's goal to offer quality care and services that set community standards and exceed patients' expectations.

Patient Rights

Improved patient outcomes and high standards of medical ethics are maintained by respecting the rights of each patient. I have a responsibility to embrace and support an environment where ethical principles are emphasized. Sharp HealthCare provides each patient with information regarding his or her rights and responsibilities, and endeavors to protect those rights while rendering care and treatment. In addition, the federal Health Insurance Portability and Accountability Act of 1996 (HIPAA) Privacy Regulations created new rights for patients concerning their own health information.

Specifically, the Privacy Regulations grant patients a number of rights over their health information. These new rights include: (1) the right to receive a Notice of Privacy Practices; (2) the right to inspect and obtain a copy of their own health information; (3) the right to request amendments to their health information; (4) the right to request an accounting of disclosures; and (5) the right to file a privacy complaint. The Notice of Privacy Practices, including a complete listing of Patient Rights and Responsibilities, is posted in each Sharp entity and on SharpNET. I accept the responsibility to familiarize myself with the provisions.

Confidentiality and Privacy

As a Sharp HealthCare employee, I am required to protect all patients' personal information. Written, verbal and electronic health information are protected by law from unlawful access, use, disclosure, loss, tampering, alteration or destruction. Use and disclosure of a patient's health information is limited to the "minimum amount necessary" to accomplish the intended purpose. Unless authorized by federal or California law, the disclosure of patient information requires a patient, or the patient's representative, to sign a written Authorization for the Use or Disclosure of Protected Health Information (PHI) for purposes other than treatment, payment of that treatment or health care operations.

PRINCIPLE 1

Quality of Care

I am committed to operating in accordance with the highest levels of professional and business practices in order to provide high-quality care.

HIPAA Privacy Regulations require safeguards for appropriate access, use and disclosure of PHI to protect patient privacy. Additionally, new security regulations also require protection for the electronic security of medical information.

Admissions, Continuity of Care, Transfers and Referrals

Decisions to admit or discharge patients are made on the basis of sound clinical decision-making. This includes accurate and complete clinical admission criteria, as well as medical necessity. Waiving of insurance copayments or deductibles is not allowed. Under certain circumstances, Sharp HealthCare may provide financial accommodation to patients, but management should be consulted regarding any special financial situations. To the extent possible, Sharp HealthCare will provide each patient with its Notice of Privacy Practices at the time initial care is provided to patients.

Patients are discharged with an after-care or follow-up plan. When follow-up care is needed, Sharp HealthCare does not inappropriately steer patients to use Sharp HealthCare's owned or operated home health agency, skilled nursing facilities or hospice care.

Referrals are based solely on the interests of the individual seeking care and treatment, but may be subject to the physician network or other contractual arrangements. Sharp HealthCare does not make cash payments or provide non-cash incentives to anyone for providing a referral or to induce a referral.



Emergency Medical Treatment and Active Labor Act (EMTALA)

Sharp HealthCare adheres to the Emergency Medical Treatment and Active Labor Act (EMTALA) by providing emergency treatment to all patients, regardless of ability to pay. Sharp HealthCare provides every patient seeking medical care at one of our hospitals with an appropriate medical screening examination to determine whether the patient has an emergency medical condition or is in active labor. Second, if the medical screening examination reveals that an emergency medical condition exists, Sharp HealthCare provides the patient with treatment necessary to stabilize this condition. Third, Sharp HealthCare may transfer a patient with a medical emergency condition to another facility, provided several statutory requirements are first satisfied.

Patient Access to Health Information

Patients have the right to receive accurate and timely information regarding their health status, provider information, diagnosis, treatment options, prognosis, follow-up and home-care plans, specialty care, continuity of care, and financial data. Federal and California laws grant patients the right to inspect, obtain copies of and request addendums and amendments to their protected health information that is maintained by a Sharp HealthCare provider or the Sharp Health Plan. I may access additional information regarding Patient Access to Health Information by visiting the SharpNET HIPAA Privacy Web page.

The trained nurse has become one of the great blessings of humanity.

— Sir William Osler

Informed Consent

The informed consent process represents a key component in providing the highest quality of care for patients and minimizing liability risk. Patients have high expectations and may become easily dissatisfied if the desired outcome is not achieved. Careful attention by the patient's physician and supporting staff to educate the patient in a thorough and supportive fashion is paramount to this process. Comprehensive counseling regarding the nature of the procedure, risks, complications, expected benefits or effects, alternative treatment and the risks associated with these options enhances patient satisfaction and autonomy.

Sharp HealthCare is committed to involving patients, their legal representatives and/or patients' families, as appropriate, in all aspects of care and treatment. For identified procedures, physician documentation in the medical record must indicate that the physician provided the patient with a clear explanation of care, including, but not limited to, the description of the procedure and any risks, complications, expected benefits or effects, alternative treatments or procedures and risks and benefits of the alternative treatments or procedures.



Informed consent is validated by the inclusion of a signed “Authorization for and Consent to Surgery or Special Diagnostic or Therapeutic Procedures” form and/or other specialized consent form(s) in the medical record. Each form requires the signature of a witness to verify the authenticity of the patient’s signature or mark if the patient is unable to write his/her name. Witnessing of a consent form also indicates that the patient did not request additional information prior to signing the form.

Advance Directives

Sharp HealthCare recognizes that competent adult patients have the right to make their own health care decisions. Sharp HealthCare complies with federal and California laws regarding the implementation of advance directives, e.g., the “Advance Health Care Directive” and other appropriately executed documents, as well as advance directives orally expressed and properly documented by physicians,

and Do Not Resuscitate (DNR) orders when applicable. Biomedical ethics committees are available to assist patients, families and health care providers with addressing uncertainty and conflict about health care issues that may arise.

Institutional Review Board

Sharp HealthCare continues to grow in research and development. The Sharp Institutional Review Board (IRB) is responsible for protecting the rights and welfare of human subject research participants. The IRB is also in place to assist Sharp’s research investigators in the ethical conduct of research, in compliance with the Office for Human Research Protections (OHRP) and the Food and Drug Administration (FDA). Sharp HealthCare has therefore established the Office for the Protection of Research Subjects (SOPRS) whose role is to support and carry out the actions of the IRB committee.

QUALITY OF CARE Sharp Standards of Excellence:

I always treat patients and other customers with respect, compassion and dignity.

I make clinical decisions based on identified patient-care needs and not the patient’s financial circumstances or Sharp HealthCare’s financial interests.

I avoid discussions concerning patient health information in public areas (e.g., restrooms, elevators).

I am careful not to leave patient files, reports or other information where the public could view them.

I uphold the privacy and confidentiality of health record information and protect the patient’s right to privacy in collecting and identifying personal information.

I adhere to the mission, vision and values of Sharp HealthCare.

PRINCIPLE 2

Business Ethics



To give real service you must add something which cannot be bought or measured with money, and that is sincerity and integrity.

— Douglas Adams

Sharp HealthCare and its employees, physicians and contractors will conduct business with honesty, fairness and integrity demonstrated through truthfulness, the absence of deception or fraud, and respect for applicable laws. My daily actions will exemplify Sharp HealthCare's Behavior Standards.

Contractors are selected only on the basis of quality, performance, reputation, price and suitability of products or services. As a Sharp HealthCare employee, I may not accept gifts, bequests, entertainment of excessive value and/or monetary gifts in any amount. I should not accept or solicit any benefit from an existing or potential supplier.

Charting and Documentation

I understand the accuracy and completeness of Sharp HealthCare's medical records are essential to maintaining ethical and professional business practices. All Sharp HealthCare employees, physicians and independent contractors who document in a medical record are responsible for accurate, appropriate, legible and timely charting of the care provided to any patient. I understand medical records must be completed in compliance with all medical staff bylaws, accreditation standards and relevant laws and regulations.

Medical Necessity

I will comply with the regulations that third-party payers have in defining the billing for medically necessary services. In such cases, I will provide clear and complete medical documentation to ensure that payment is made only for those items or services that are determined to be "reasonable and necessary."

Medical Records, Coding and Billing

I recognize that all physicians and employees involved in billing and coding are expected to understand and comply with billing- and coding-related policies and procedures established by Sharp HealthCare and by third-party carriers (including Medicare and Medi-Cal) to which claims are submitted. I will take every reasonable precaution to ensure that billing and medical-record coding is accurate, timely and in compliance with federal and California laws and regulations.

Record Retention

All records (such as medical, financial and employee) will be stored in a safe and secure location for the period of time required by law. I will organize records in a manner that permits prompt retrieval. Old or unnecessary records will be properly disposed of in accordance with appropriate retention schedules and Sharp HealthCare document destruction/recycling policies. Shredding bins are located at each entity for convenience. I understand that employees, physicians or independent contractors should never destroy or alter any document in anticipation of, or in response to, a request for those documents by any government agency or court.

PRINCIPLE 2

Business Ethics

I expect day-to-day decisions made by everyone at Sharp HealthCare to reflect our mission, commitments, values and behavior standards.



Have the courage to say no.
Have the courage to face
the truth. Do the right thing
because it is right. These are
the magic keys to living your
life with integrity.

— *W. Clement Stone*

Competition and Antitrust

As a Sharp HealthCare employee, I must avoid all actions that are anti-competitive or otherwise contrary to laws that govern competitive practices in the marketplace.

I will never discuss with or disclose to someone from another company price or market information without consulting Sharp HealthCare's Legal Affairs Department. Under no circumstances should competitively sensitive information regarding Sharp HealthCare's competitors or contractors be exchanged. If I am uncertain of the sensitivity of information, I will address the issue with my manager.

Sarbanes-Oxley Act

The Sarbanes-Oxley Act of 2002 is aimed at strengthening corporate governance and board accountability.

The principle goals of Sarbanes-Oxley are:

- Increased Board responsibility to oversee management and auditors to ensure that the Board is fully informed
- Reduced risk that external auditors are compromised by conflicts, coercion, or non-standard accounting techniques that result in inaccurate financial data
- Improved management practices in preparing and reporting on business data

While Sarbanes-Oxley currently applies to publicly traded corporations registered with the Securities and Exchange Commission, its effects are creating pressure on all organizations to establish best practices in the areas of finance, management, legal and compliance.

Access to Patient Health and Business Information

Sharp HealthCare employees, physicians, volunteers, contractors and students are responsible for helping ensure the confidentiality and privacy of corporate information and patient health information. I understand that access to Sharp HealthCare's medical records, billing records, computing environments, data communications and data resources will be limited to the "minimum necessary" to accomplish the intended or specified purpose required by each employee's job duties.

When I am assigned a unique identification code and/or password in order to access Sharp HealthCare information systems, I will be held responsible for maintaining the integrity of the health information I access. I understand that sharing identification codes or passwords, or unauthorized access or disclosure of confidential information, is prohibited and will result in disciplinary action up to and including termination and/or revocation of access. If a password has been compromised or revealed to anyone other than the authorized user, I should contact the Information Systems Department Security Administrator.



BUSINESS ETHICS Sharp Standards of Excellence:

All coding assignments and bills for services are supported by clinical documentation.

All clinical documentation supports the medical necessity and level of services provided.

Bills will not be falsified to avoid third-party edits or denials.

I will not process a bill in a way that is contrary to my understanding of the rules or regulations of that payer.

I will not use or share Sharp proprietary information for my own personal use.

I will prepare and maintain all patient and corporate records accurately and retain such records for time periods required by law and Sharp HealthCare.

I will refrain from relationships with competitors that may infer collusion or improper competition.

I will protect my computer password from disclosure.

I will report any arrangements where individuals are influenced in any way for referrals.

I am aware of my entity's document destruction/shredding policies and regularly use the destruction bins at my entity.

PRINCIPLE 3

Conflicts of Interest



There is a big difference
between what you have
the right to do and what
is right to do.

— Justice Potter Stewart

A conflict of interest includes anything that divides my loyalty between the best interests of Sharp HealthCare and those of a patient, supplier, friend, relative, visitor or competitor. Here are some instances in which a conflict of interest may exist:

- Direct or indirect ownership of or substantial interest in a company or private business that is a competitor of or a supplier of goods and services to Sharp HealthCare
- Acceptance of gifts, payments or services from those doing business or seeking to do business with Sharp HealthCare
- A situation in which financial or other personal considerations may compromise or appear to compromise delivery of patient care
- Serving as a director, officer, consultant or other key role with a company or private business that is conducting business, seeking to do business or competing with Sharp HealthCare
- Hiring or contracting with a family member or friend to provide goods and/or services to Sharp HealthCare

Gifts and Gratuities

Certain gifts and gratuities have the potential to pose an ethical dilemma. Sharp has a gifts and gratuities policy to help guide me to make the right choice when faced with an ethical dilemma regarding gifts.

As a Sharp HealthCare employee, I am not permitted to offer or accept monetary gifts in any amount, to or from any person or entity that is doing business with, seeking to do business with, or who is a competitor of Sharp HealthCare. If a patient, family member or other individual offers a monetary gift, the individual should promptly be referred to the appropriate foundation office where a donation can be made.

PRINCIPLE 3

Conflicts of Interest

I am dedicated to conducting business within guidelines that prohibit actual or potential conflicts of interest.





Acceptable items include the following: unsolicited advertising or promotional materials, such as a pen, cup/mug, calendar, paperweight or other traditional marketing item with little to no value other than name recognition.

Questions regarding accepting gifts should be brought to my manager or the Corporate Compliance Department, or I can refer to the Gifts and Gratuities Policy on SharpNET for further guidance.

Customer and Business Associate/Contractor Relations

All business relationships with contractors must be conducted impartially and in a fair manner in compliance with Sharp HealthCare policies. A contractor

cannot be required to cease business with Sharp HealthCare competitors, or to purchase Sharp HealthCare products or services, in order to gain favorable contracts with Sharp HealthCare.

Anyone representing Sharp HealthCare or acting on its behalf in negotiating agreements has a responsibility to: (1) obtain clarification regarding questionable issues, and (2) report efforts by independent contractors to inappropriately influence business relations and activities.

Sharp HealthCare's leadership must secure a written Business Associate Agreement with all persons and organizations who will receive, use or gain access to protected

Real integrity is doing the right thing, knowing that nobody's going to know whether you did it or not.

— Oprah Winfrey

health information. Business Associate Agreements will do three things. They will: (1) identify the protected health information to be disclosed and used; (2) ensure the appropriate use of that protected health information; and (3) impose security, inspection and reporting requirements on the business associate.

Protected health, confidential, proprietary and unclassified information shared by a customer or a representative of a contracting entity should be held confidential. A contractor may not agree to provide special discounts or other favorable treatment to a Sharp HealthCare employee or other affiliate of Sharp HealthCare in an effort to gain favor.



Community and Political Involvement

Sharp HealthCare encourages employees, as private citizens, to participate in the political process and to serve as advocates for community-service organizations. Affiliations and contacts with community officials, religious and charitable organizations, political parties and governmental agencies should be conducted in compliance with applicable law. Participation in such activities should not:

- Interfere with the satisfactory performance of job-related duties
- Bring discredit, embarrassment or liability to Sharp HealthCare

- Jeopardize the tax-exempt status of Sharp HealthCare
- Create a conflict of interest

Sharp HealthCare funds, equipment, facilities, and/or assets may not be utilized to support a political party, candidate(s), holder of any government position or any community organization without administrative approval.

I may personally participate in and contribute to individuals, organizations or campaigns, but must do so clearly as a private citizen, using my own funds and name.

CONFLICTS OF INTEREST Sharp Standards of Excellence:

I **refrain** from accepting gifts from suppliers or customers whose intention may be to give or receive business in return.

I **always** follow purchasing policies.

I **refrain from** accepting any cash from a patient, customer or supplier.

All rebates, discounts and allowances I receive are justified and properly documented.

I **act** with integrity and professionalism, and avoid conflicts of interest.

I **validate** with my manager that a Business Associate Agreement exists prior to sharing protected health information.

My relationship with a competitor or supplier does not create the appearance of a conflict of interest.

I **am** aware that policies and procedures exist regarding the use of Sharp HealthCare data or property for personal gain.

I **protect** information about the system, suppliers or competitors from persons who could use that information for unlawful purposes.

I **make** sure that my family members are not involved in another business activity that might interfere with how I perform my duties as a Sharp employee.

PRINCIPLE 4

Corporate Assets



It has become dramatically clear that the foundation of corporate integrity is personal integrity!

— *Sam DiPiazza*

Protecting Sharp HealthCare's Assets

All Sharp HealthCare financial documents must be prepared accurately, reliably, honestly and in accordance with established finance and accounting procedures. Standards and procedures are in place to ensure that Sharp HealthCare's assets are protected and used in accordance with their intended purpose.

Entries of cost, financial or similar business information will be made only to the regularly maintained books and records of Sharp HealthCare. Any resources purchased or leased by Sharp HealthCare are intended to be used solely for business purposes. Private use of Sharp HealthCare's assets and resources for personal benefit or gain is not allowed. The destruction of Sharp HealthCare's property is prohibited.

Safety, Health and Environmental Matters

Every effort is made to prevent accidents by establishing safety procedures and by using proper equipment, instructions and safeguards.

To this end, Sharp HealthCare implements the following initiatives: the Injury and Illness Prevention Program, safety committees, a system to report hazardous or unhealthy work conditions, procedures for investigating and addressing accidents and unsafe conditions, injury prevention specialists' consultation services, and training in healthful and safe work practices.

The illegal use, sale or transfer of drugs is prohibited. I understand that I may not possess or drink alcoholic beverages in the workplace or report to work under the influence of any illegal drug or alcohol. I realize that any violations will be dealt with in accordance with Sharp HealthCare's Substance Abuse Policy.

Proprietary Information and System Property

Sharp HealthCare complies with all copyright and software licensing laws. As an employee, I may not make copies of computer software programs for personal use, and realize that unauthorized duplication of copyrighted computer software violates the law and Sharp's Commitment to Principles. I understand that Sharp disapproves of such copying and recognizes the following principles as a basis for preventing its occurrence:

- Sharp will neither engage in nor tolerate the making or using of unauthorized software copies under any circumstances
- Sharp will provide legally acquired software to meet legitimate software needs in a timely fashion and in sufficient quantities for all Sharp computers
- Sharp will comply with all licenses or purchase terms regulating the use of any software it acquires or uses
- Sharp will enforce strong internal controls to prevent the making or use of unauthorized software copies, including effective measures to verify compliance with these standards and appropriate disciplinary measures for violation of these standards

PRINCIPLE 4 Corporate Assets

I commit to workplace excellence by respecting the dignity of those I serve, protecting the property of the Sharp HealthCare system, and promoting creativity, innovation and accountability.





If it is not right do not
do it; if it is not true
do not say it.

— *Marcus Aurelius*



It is my understanding that copyrighted or trademarked materials may not be copied or used without written permission. I am prohibited from using or copying any customer and/or supplier price lists, contracts, documents, publications, computer systems, software information or products in violation of a third party's interest.

Confidential and/or exclusive business information is considered to be an asset of Sharp HealthCare, and such information should not be shared with others — including fellow employees — without a legitimate business reason. Similarly, it is Sharp's policy to respect the trade secrets and intellectual property rights of others. Sharp's assets may be used only for authorized business purposes.

Acceptable Use of Information and Computing Resources

Every person who is eligible and authorized to access information contained on the Sharp HealthCare computer network is responsible for the protection of Sharp's confidential and proprietary data assets. My responsibilities include:

- Protecting passwords from use by any other person
- Appropriate access to confidential data
- Safe practices for virus management
- Reasonable and professional use of e-mail
- Web and Internet services
- Adherence to all laws, regulations and policies which protect information and maintain medical privacy

I understand that any violations will be dealt with in accordance with Sharp's Information Security policies.

CORPORATE ASSETS Sharp Standards of Excellence:

I am accurate in my timekeeping.

I am honest in filling out my expense reports.

I take appropriate action to report and correct a potential safety hazard.

I take care in handling biohazardous materials according to policy.

I never use Sharp HealthCare copiers or supplies, such as "scrubs," for personal use.

I protect proprietary information, ideas and intellectual property assets for Sharp HealthCare.

I take responsibility for proper handling of confidential and proprietary information that is printed, faxed, copied, e-mailed or accessed from home or laptop.

PRINCIPLE 5

Regulatory Affairs



Always do right —
this will gratify some
and astonish the rest.

— Mark Twain

Requests from Government Officials and Regulatory Agencies

Under the direction of the Legal Affairs Department, Sharp HealthCare cooperates fully with requests for information from government auditors, investigators or other regulatory agency officials. If a government investigator contacts me by a phone call, visit or search warrant, this situation should be brought immediately to the attention of my supervisor, the vice president of corporate compliance and the Legal Affairs Department.

If I am contacted by a government agent in connection with an investigation or request for documents, I should identify the government agency(ies) executing the search warrant and obtain a business card from the individual(s) presenting the warrant. If a search warrant is presented, I will ask to make a photocopy of the search warrant and affidavit. I will then write down the subject that the agent wishes to discuss and immediately contact my supervisor, the vice president of corporate compliance and the Legal Affairs Department.

If contacted by a government agent in connection with an investigation, I will:

Ask: If contacted in person, I will ask for identification and a business card, and make copies of both. If contacted by phone, I will ask for and write down the agent's name, office address and telephone number.

Call: I will call my manager and the Compliance Department immediately. Alternatively, I may call any member of administration, including the Legal Affairs Department.

Compliance Department:
(858) 499-3138

Legal Affairs Department:
(858) 499-4021

Take: I will take notes and write a list of any documentation presented to a government representative.

Tell: I will tell the representative the truth. If I don't know, I will say "I don't know." I will not guess a response. I may be required to answer questions about the location of documents only. I have the right to wait until counsel is present to answer any questions. For more information, I can refer to the Compliance Related Government Investigations Policy on SharpNET.

Government Business

Special care must be exercised when dealing with government officials and agencies. Laws, regulations and ethical standards that apply to business with federal, California and local government agencies often differ from those that apply to dealings with non-government customers and suppliers. Sharp employees who work with government business divisions are responsible for knowing and complying with applicable laws and regulations. Some of these laws and regulations are described below.

Laws and Regulations

The submission of false information or false claims to the government may violate laws such as the Mail and Wire Fraud Statute, False Claims Act and False Statements Act.

Mail and Wire Fraud Statute

The use of company mail or wire

PRINCIPLE 5

Regulatory Affairs

In all our business transactions, I will ensure compliance with all statutes, regulations and guidelines applicable to federal and California health care programs, and with Sharp HealthCare's own policies and procedures.

services, such as fax machines, e-mail or telephone systems, to transmit false or misleading information constitutes mail and wire fraud.

Federal and California

False Claims Acts

A false claim is any attempt to obtain money from the federal government or the state of California by knowingly presenting false or misleading information relating to payment from the government. An example of a violation of this law includes, but is not limited to, an associate knowingly recording or processing any information inaccurately, e.g., changing a beneficiary name, changing dollar amounts on claims, filing false time reports or filing false expense reports. For detailed information on the False Claims Act, I can look to the Reporting, Investigations and Non-retaliation Policy on SharpNET.

False Statements Acts

The federal and California False Statements Acts prohibit a person from making a false or misleading statement or withholding material information in connection with the delivery of services to or payment from the government. If done intentionally and with the intent to mislead the government, examples of potential violations include:

- Providing false reports or data
- Falsifying conflict-of-interest information
- Making a false statement to a government auditor
- Presenting false or misleading information in a contractor performance review

Anti-Kickback Statutes

Federal and California anti-kickback statutes impose severe criminal, civil and monetary penalties not only on individuals or organizations that offer a “kickback,” but also on individuals or organizations that accept such kickbacks. A kickback is considered any money, fee, commission, credit, gift, gratuity, discount, rebate, item of value or compensation of any kind that is provided, directly or indirectly, to improperly obtain or reward favorable treatment.

I understand that Sharp HealthCare prohibits payment or acceptance of anything of value in return for, or to induce the referral of any patient for any service that may be payable under Medicare, Medi-Cal or any other federal or California health care program. Payments or items of value offered to influence referrals to or from Sharp HealthCare are considered inducements and are prohibited.

Obstruction of a Federal Audit

This law prohibits anyone from intentionally deceiving or defrauding the United States. Also, the law prohibits anyone from attempting to influence, obstruct or impede a federal auditor in the performance of official duties. This law includes, but is not limited to, routine government audits and government investigations.

California Medical Privacy Statutes

California requires that health care providers preserve the confidentiality of a patient’s record. Any negligent treatment of those records shall be subject to remedies and penalties.

Federal and California

Whistleblower Protection Laws

Both federal and California whistleblower laws offer protection for whistleblowers from retaliation where their allegations could legitimately support a False Claims Act case. California provides a whistleblower hotline to receive calls and maintain the anonymity of the caller, while the federal government provides confidential forms that can be filled out to report fraud and abuse.

Deficit Reduction Act

The Deficit Reduction Act requires that any health care provider receiving Medicaid payments of at least \$5 million per year must establish internal policies and provide education on whistleblower protections with respect to preventing and detecting fraud, waste and abuse in federal health care programs. For further guidance, I can look to the Reporting, Investigations, and Non-retaliation Policy on SharpNET.

Watch the little things;
a small leak will sink a
great ship.

— Benjamin Franklin

Disclosure

Sharp HealthCare is committed to appropriately disclosing violations of law, regulations or requirements under all government or business contracts to applicable governing entities.

Sharp HealthCare Corporate Integrity Agreement Requirements

Sharp HealthCare is committed to full compliance with all terms, statutes, regulations and guidelines established and enforced by government agencies. Sharp HealthCare has entered into a Corporate Integrity Agreement (CIA) with the Office of Inspector General (OIG) of the Department of Health and Human Services (DHHS) to promote compliance by its officers, directors, employees, contractors and agents with the statutes, regulations and written directives of Medicare, Medi-Cal and all other federal and California health care programs. The CIA specifies additional provisions and compliance requirements related to the accuracy and review of billing, coding and cost-reporting practices.

Sharp HealthCare requires, as a condition of employment, that all officers, directors, employees and other contracted individuals who participate in the process of preparing claims, cost reports or other requests for reimbursement from any federal health care program, and are therefore “covered individuals” under the CIA, comply with all terms, statutes, regulations and guidelines applicable to government health care programs and with Sharp HealthCare’s own policies and procedures, including the requirements of the CIA.

All covered and non-covered individuals are expected to report suspected violations of any term, statute, regulation or guideline applicable to government health care programs and any suspected violations of Sharp HealthCare’s policies and procedures.

There are significant consequences to Sharp HealthCare for failure to comply or failure to report noncompliance with all terms, statutes, regulations and guidelines applicable to federal health care programs and with Sharp HealthCare’s own policies and procedures. Penalties can include civil and criminal conviction, imprisonment and fines. Further information about these requirements and potential penalties are provided in the *Government Business* section on page 29.

Affiliated Organizations/ Individuals

Sharp HealthCare works closely with nonemployed individuals and organizations that serve as board members, medical professionals, contractors, students and volunteers.

Each is expected to honor and abide by all applicable portions of the Sharp HealthCare Commitment to Principles and policies while working in any Sharp facility or conducting business with or on behalf of Sharp HealthCare.

Marketing and Media Inquiries

Sharp HealthCare’s advertising must be truthful and not misleading. Any marketing claims about Sharp HealthCare’s services must be clearly supported by evidence. All pricing advertisements must accurately reflect the true charges for services. Sharp HealthCare will not use or disclose protected health information for the purposes of marketing communications without a written authorization from the individual.

The release of sensitive information could have a negative impact on patients, physicians and employees, as well as Sharp’s reputation and interests. Requests from the media for information regarding a patient’s condition, requests for interviews with staff members, visitors or patients are received frequently. All requests from news media personnel should be referred to management and the Public Relations and Communications Department.

Tax-Exempt Status

Sharp HealthCare entities are nonprofit corporations exempt from taxation under the Internal Revenue Code and other applicable California laws. As such, Sharp HealthCare must comply with Internal Revenue Service laws and regulations, engage in activities that further tax-exempt purposes, and use

REGULATORY AFFAIRS Sharp Standards of Excellence:

I will verify the accuracy of information before providing it to others for use in marketing.

I am careful not to discuss Sharp HealthCare’s business with members of the media unless directed to do so.

I will obtain patient authorization prior to disseminating any marketing communication.

resources to promote such a purpose. Employees are not allowed to use the tax-exempt status of Sharp HealthCare for personal gain.

Cost Reports

Sharp HealthCare is required by federal and California laws and regulations to submit reports of its operating costs and statistics. These laws and regulations define what costs are permissible and outline the reimbursement procedures for the cost of services provided to a beneficiary.

Sharp is committed to providing appropriate education to staff regarding federal and California laws, regulations and guidelines. All issues related to the preparation, submission and settlement of cost reports must be performed by or coordinated with Sharp’s finance and compliance departments.

PRINCIPLE 6

Compliance Reporting and Our Shared Responsibilities



Notice that “I” is at the center of the word “ethical.” There is no “they.” Achieving the ethics of excellence is our individual assignment.

— Price Pritchett

What to Do When Compliance Issues Arise

Knowing and Complying with Sharp's Policies

Because the Sharp HealthCare Commitment to Principles cannot address every potential situation or issue, it is critical that I understand the principles in this booklet and apply them appropriately. Sharp HealthCare's Commitment to Principles provides guidelines for behavior, and while not itself a contract of employment, it is a condition of my employment.

Sharp HealthCare employees, physicians and independent contractors are responsible for knowing, understanding and complying with the Commitment to Principles and Sharp HealthCare policies and procedures it serves to reinforce.

The Commitment to Principles provides a framework for putting our values and integrity into action, and serves as a guide for ethical conduct. As a Sharp HealthCare employee, I must take responsibility for safeguarding the integrity of the organization, and also the integrity of my own actions.

My conduct is my own responsibility. I must never engage in dishonest or illegal behavior, even if directed to do so by a manager or coworker, nor should I direct others to act in such a manner. If requested to act in such a manner, I must report it immediately to the Corporate Compliance Department.

Management Responsibility

Management has a responsibility to support the Commitment to Principles, and will be measured in performance for:

- Ensuring that all current and new employees under their supervision are educated in the meaning and application of the Commitment to Principles
- Emphasizing, by word and action, Sharp HealthCare's continuing commitment to compliance: the prevention, detection and correction of inappropriate conduct
- Reviewing annually employees' knowledge and understanding of the Commitment to Principles, and supporting and assisting employees in complying with the Commitment to Principles.
- Ensuring strict compliance with Sharp HealthCare's Non-retaliation Policy

PRINCIPLE 6

Compliance Reporting and Our Shared Responsibilities

I am committed to preventing, detecting and reporting violations of Sharp HealthCare policies, statutes, regulations or guidelines applicable to federal and California health care programs.

It takes less time to do a thing right than it does to explain why you did it wrong.

— Henry Wadsworth Longfellow



Reporting Compliance Violations

I have an obligation to report any actual or suspected violation of the Commitment to Principles. Reporting suspected violations is not an act of disloyalty. Rather, it shows responsibility and fairness to patients and payers as well as protects Sharp HealthCare's reputation and assets.

To report compliance violations, I may do any of the following:

- Contact my manager to discuss questionable issues
- Contact senior management or the compliance liaison from my facility (see page 41 for liaisons)
- Contact the Sharp HealthCare Compliance Department or Legal Affairs Department
- If I prefer to remain anonymous, I can call the Sharp HealthCare Compliance Connection Hotline at 1-800-350-5022. All calls are treated confidentially and no attempt is made to identify the number from which the call is made
- Or, if I prefer, I have the option of completing a report on **www.mycompliance.com**.

To make a report, I can go to **www.mycompliance.com**, click on "Begin New Report," and enter "shc" as the access ID.

My report will go directly to the vice president of corporate compliance for appropriate action. If I wish, I can

Act as if what you do makes a difference. It does.

— *William James*

submit my report anonymously. If I choose to identify myself, my identity will be held in confidence as permitted or required by law.

The Compliance Connection Hotline

All calls to the Compliance Connection Hotline are received by trained personnel, independent of Sharp HealthCare, who document and forward all issues to the vice president of corporate compliance for appropriate action. Calls to the Compliance Connection Hotline will not be electronically recorded. Callers will have the option to remain anonymous. If I choose to identify myself, my identity will be held in confidence as permitted or required by law. All disclosures, interviews and reports shall also be kept confidential, as permitted or required by law. All calls will be followed up on and investigated in a timely manner.

Non-retaliation Policy

Sharp HealthCare understands that an employee's willingness to report potential compliance violations is reduced if the employee believes he/she will be subject to retaliation or retribution. Any employee who reports, in good faith, an alleged act

of misconduct will not be subject to retaliation or retribution. Any employee engaging in retaliatory activity is subject to discipline, up to and including termination. For more details, I can refer to the Reporting, Investigations, and Non-retaliation Policy on SharpNET.

Investigation and Resolution

The Sharp HealthCare Compliance Department will impartially and thoroughly review, evaluate and respond to allegations of misconduct, concerns and/or inquiries made directly to the Compliance Department and/or the Compliance Connection Hotline. All allegations will be investigated and verified before any action is taken.

Disciplinary Action

I understand that adhering to the Commitment to Principles, as well as all Sharp HealthCare policies and procedures, is a condition of employment and of doing business with Sharp HealthCare. Persons who violate any of the compliance principles or any Sharp policy are subject to discipline, including potential loss of employment, the inability to continue doing business with Sharp HealthCare or the loss of staff membership privileges.

Disciplinary action may be taken for, but not limited to, any of the following circumstances:

- Authorizing or participating in actions that violate the Commitment to Principles or Sharp HealthCare's policies and procedures
- Failing to report a possible violation of the Commitment to Principles
- Refusing to cooperate in the investigation of a potential violation
- Disclosing confidential information about an investigation
- Retaliating against an individual for reporting a potential violation
- Making intentional false reports of misconduct or violation of the Commitment to Principles

The nature of any disciplinary action will depend on the nature of the violation and the circumstances involved.

COMPLIANCE REPORTING AND OUR SHARED RESPONSIBILITIES

Sharp Standards of Excellence:

My actions comply with the intent and purpose of the Commitment to Principles.

My actions are honest in every respect.

I am always aware of how my actions may be perceived by others.

The time is always right
to do what is right.

— Martin Luther King Jr.

Resource Guide



Quality means doing it right
when no one is looking.

— Henry Ford

Resource Guide

The Resource Guide is designed to provide internal resources available to me for reporting and resolving potential violations as outlined in Sharp's Commitment to Principles. When I have a question or concern about the Commitment to Principles; a situation or issue not covered in this booklet; need assistance to report or discuss issues related to a possible violation of the Commitment to Principles, policies and procedures, or any compliance requirement or an ethical dilemma; I have several options.

Sharp HealthCare provides necessary education regarding the Sharp HealthCare Commitment to Principles and the Compliance Connection Hotline for all employees. Some employees will receive specialized education on subjects such as billing, coding, documentation, medical necessity, employment regulations, information security awareness and medical privacy that relate specifically to job responsibilities.

Expedients are for the hour,
but principles are for the ages.

— *Henry Ward Beecher*

My Resources



When we do the best that we can, we never know what miracle is wrought out in life, or in the life of another.

— *Helen Keller*

My Manager

My manager is responsible for knowing and demonstrating compliance with the Commitment to Principles and operational policies and procedures within his or her area of operation.

My manager is one of the primary contacts who will answer questions and provide direction regarding compliance concerns. I may consult with my manager for information about compliance requirements and operational policies and procedures. If I do not feel comfortable talking with my manager about a potential compliance issue, I may use one of the following available resources:

Corporate Compliance

The Corporate Compliance Department facilitates investigations and ensures resolution of suspected violations of federal and California law, the Commitment to Principles and Sharp HealthCare policies and procedures. The Corporate Compliance Department works collaboratively with management, Human Resources, the Legal Affairs Department, Internal Audit Services and external examiners to ensure fair resolution of ethical and compliance concerns.

Human Resources

The Human Resources Department can assist me in assessing my concerns and directing me to the appropriate resource or remedy. Compliance concerns can include a number of related workplace issues that can be best managed through human resources and management. All local Human Resources directors and the vice president of employee/labor relations and recruitment services are available to assist me.

Legal Affairs

The Legal Affairs Department provides important interpretation of statutory and regulatory business requirements and works collaboratively with the Corporate Compliance Department to investigate and resolve compliance concerns and related disciplinary action.

Internal Audit Services

Internal Audit Services conducts annual focused reviews to assess business operational controls. As appropriate, Internal Audit Services may assist the Corporate Compliance Department with investigations.

Department Contacts

Compliance Connection Hotline	(800) 350-5022
Vice President of Corporate Compliance	(858) 499-4015
Privacy Officer	(858) 499-3027
Corporate Compliance Department	(858) 499-3138
Legal Affairs Department	(858) 499-4021
Human Resources Department	(858) 499-5228
Information Systems Security Administrator	(858) 627-5256

I feel the capacity to care
is the thing which gives life
its deepest significance.

— Pablo Casals



Compliance Liaisons

Rick King	Sharp Chula Vista Medical Center
Paul Durr	Sharp Community Medical Group
Tony Guerra	Sharp Coronado Hospital and Healthcare Center
Kari Cornicelli	Sharp Grossmont Hospital
Leslie Pels-Beck	Sharp Health Plan
Lyleen Pricor	Sharp Home Health Services
Pat Salmon	Sharp HospiceCare
Kathi Lencioni	Sharp Mesa Vista and Sharp Vista Pacifica hospitals
Kevin Thompson	Sharp Metropolitan Medical Campus
Elena Cresap	Sharp Mission Park Medical Centers
Melissa Korican	Sharp Rees-Stealy Medical Centers
Carol Wanke	Patient Financial Services, Community Care Division
Gerilyn Wagner	Patient Financial Services, Institutional Care Division

The glue that holds all relationships together — including the relationship between the leader and the led — is trust, and trust is based on integrity.

— Brian Tracy

Instructions for Completing Certification

Sharp HealthCare Employee

Complete your certification online as part of the annual mandatory compliance education. You do NOT need to complete the written certification on Page 43.

Physician or Volunteer

Please complete the next page and return it to your Sharp HealthCare contact.



The best portion of a good person's life is the little nameless, unremembered acts of kindness and love.

— William Wordsworth

Certification

I certify that I have received and read the Sharp HealthCare Commitment to Principles and that I understand its purpose and how it applies to me.

I agree to comply with the Commitment to Principles.

I agree to adhere to and comply with the following requirements as a condition of my employment and I understand that it is a component of my annual performance review. Sharp HealthCare will take disciplinary action, including and up to termination, for violations of:

- The Commitment to Principles
- Sharp HealthCare's policies and procedures
- Applicable laws and regulations
- Terms and guidelines of government health care payers and programs
- Corporate Integrity Agreement requirements, as applicable
- Obligation to report all known or suspected violations listed above

I recognize that Sharp HealthCare prohibits retaliation against any individual who makes a good-faith report of a compliance issue.

I have a responsibility to discuss the importance of the Commitment to Principles with anyone under my supervision, as applicable.

I understand that these standards may be amended, modified, or clarified at any time and that I will have access to any updates that may occur.

First/Last Name (print)

Signature

Date Signed (month/day/year)

Employee Number

Sharp HealthCare Facility

Department



SHARP[®]

San Diego's Health Care Leader ~

1-800-82-SHARP www.sharp.com

~ A Health Care Organization Designed Not For Profit, But For People ~

8695 Spectrum Center Blvd., San Diego, CA 92123

Exit Instructions

We hope this course has been informative and helpful.

**Please take the
Module 5 Quiz**