

■ ■ ■ What Happens if You Break the Rules

Employees who knowingly break our rules or a state or federal law or who fail to follow policy are subject to disciplinary action up to and including dismissal. Some examples of actions that can lead to dismissal include:

- Billing for items or services not actually provided
- Providing unnecessary services
- Using a billing or DRG code that provides for a higher payment rate than the correct code
- Submitting more than one claim for a single service
- Submitting a claim to more than one primary payor at the same time
- Submitting false cost reports
- Submitting bills in a piecemeal or fragmented way to increase payment for tests or procedures that should be billed together
- Submitting claims for full DRG payment on patients who were transferred to another hospital
- Retaining overpayments from federal programs
- Submitting false statements or certifications about contract negotiations
- Distorting the truth or making false claims in marketing or advertising activities
- Unlawfully fixing or reducing price competition
- Using information known to be private to a competitor
- Offering a kickback for purchase of a service or referral of a patient
- Improperly disclosing confidential patient information
- Unlawfully donating hospital funds, services, products or other resources to any political cause, party or candidate

Code of Conduct

■ A system of

■ employee empowerment

■ and accountability

Corporate Compliance Hotlines

Pitt County Memorial Hospital	1.888.777.2617
Bertie Memorial Hospital	252.794.8489
Chowan Hospital	252.482.5494
Heritage Hospital	252.641.2720
Roanoke-Chowan Hospital	252.332.4787
The Outer Banks Hospital	252.449.4542
All others/Corporate Office	1.888.777.2617

This brochure explains the code of conduct for employees of University Health Systems of Eastern Carolina. The code is a guide to help all employees make sure they conduct official business in a manner that is both lawful and ethical.

As an employee, you must be sure you understand and follow this code. While it will not cover all situations, it does set standards for some issues. Talk to your supervisor, your facility compliance officer or the chief audit/compliance officer if you have questions that are not answered here.

Code of Conduct

1 As a University Health Systems employee, you are expected to abide by a high standard of ethical behavior at all times. You must obey the laws and rules that apply to your facility's operation and to your particular duties. In most cases, we are proud to say that our employees willingly adopt and uphold our standards.

Sometimes, however, employees make mistakes because they are not aware of the rules. We urge you to make sure you know and understand all the rules and policies that apply to your work. If you are not familiar with them, you might make mistakes that could be costly to your facility and to you. If you do not know what rules apply to you, talk to your supervisor, your facility compliance officer or call the chief audit/compliance officer.

2 You must also be careful to understand and obey applicable laws and regulations. You should be particularly careful not to inadvertently do anything that amounts to fixing prices, limiting competition or dividing up customers or markets.

Be careful not to engage in any of the following illegal activities:

Kickbacks – You may not ask for, give or receive any kind of direct or indirect payment or reward for Medicare or Medicaid referrals.

False Claims – You may not make false or misleading claims for services given or received or about people who gave or received services.

Mail and Wire Fraud – You must not send false claims or statements through the US Postal Service or electronically.

3 It is your duty to report any transaction or conduct that you think may be a violation of federal, state or local law. You can do that by:

- Notifying your immediate supervisor
- Contacting the chief audit /compliance officer by telephone (252-847-0125), mail (chief audit /compliance officer, Venture Tower) or e-mail (jfalceta@pcmh.com)
- Making a toll-free, anonymous call to the compliance hotline at 1-888-777-2617

4 You must also report anything you see or hear that may be a violation of rules or policies dealing with the following:

- financial records
- living wills
- patient care
- personal conduct
- personnel issues such as: equal employment, sexual harassment, personal conduct, the Fair Labor Standards Act and time and attendance.

Stay Informed

You can call your facility compliance officer if you have questions about policy, ethics or rules that apply to the following areas:

- Accounting/record keeping
- Antitrust matters
- Billing
- Competition
- Conflict of interest
- Customer & supplier relations
- Patient care
- Racial discrimination
- Referrals
- Safety, health & environmental issues
- Sexual harassment