
Code of Excellence

A guide to ethical and professional conduct for
team members and medical staff

Important notice

- If you are a team member of Prisma Health, you must read this entire Code of Excellence. If you have questions about any provision or its requirements, please contact your Prisma Health supervisor, your Human Resources partner or the Corporate Compliance Office. That person, or someone at that person's direction, will help answer your questions.
- If you are not a team member, but you perform some or all of your work for the organization or are on organization property, read and follow the Code of Excellence for vendors.
- The provisions of the Code of Excellence are mandatory. Compliance with the standards, policies, procedures and other provisions contained in the Code of Excellence is a condition of continued employment or association with Prisma Health.
- This document supersedes any code of ethics booklets previously issued by Prisma Health. Thus, any code of ethics booklets previously issued by Prisma Health are revoked.
- This document does not create a contract of employment between you and Prisma Health. Your employment with Prisma Health is "at will," meaning that either you or Prisma Health may terminate your employment at any time with or without cause.
- Only a document entitled "contract" or "agreement" and signed by the president or his authorized designee can create a contract between you and Prisma Health or alter your "at will" employment relationship with Prisma Health.

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Welcome to Prisma Health

Prisma Health is proud to provide high-quality healthcare with integrity, compassion and the highest ethical standards. Our Corporate Compliance Program demonstrates our commitment to abide by the laws, rules, regulations and policies that govern the provision of healthcare services.

As a crucial part of the Corporate Compliance Program, this guide has been developed to summarize many of the rules, policies and requirements of ethical and compliant behavior to be followed by all who work for or with Prisma Health.

Everyone at Prisma Health will be provided a copy of this Code of Excellence. Everyone is required to read, understand and follow it. Everyone also is required to report to Prisma Health anything he or she believes to be wrong or in violation of a law or policy.

Several methods are available to report ethical or legal concerns, including reporting to your leader, Human Resources or the Corporate Compliance Office. Prisma Health does not tolerate team members, contractors or other persons who retaliate against a person who makes a good faith report under this policy. We make every effort to handle reports confidentially. In addition, we have a toll-free Compliance Hotline by which a report can be made anonymously by phone or online.

We look forward to working with you at Prisma Health to provide stellar care in an ethical, legal and proper manner.

Sincerely,



Craig Brown,
Chair, Board of Directors



Mark O'Halla,
President and CEO

Our purpose is to:
Inspire health.
Serve with compassion.
Be the difference.

The Prisma Health Corporate Compliance Program (“Compliance Program”), which includes this Code of Excellence (“Code”), applies to Prisma Health and its affiliated entities and organizations.

The Compliance Program, described in detail below, requires that all Prisma Health team members, directors, physicians, allied healthcare providers, agents and contractors (“team members and associated persons”) comply with this Code and all the laws, rules, regulations and policies applicable to them in connection with the performance of their professional responsibilities for, or on behalf of, Prisma Health or with business transactions involving Prisma Health.

The Code sets forth the organization’s commitment to comply with the laws, rules and regulations that apply to the healthcare industry and to provide high-quality service to our community. The Code is intended to:

- Inform team members and associated people about the importance of compliance with Prisma Health policies and standards of workplace behavior
- State the requirement that Prisma Health team members and associated people comply with all laws, rules and regulations applicable to their professional responsibilities
- Emphasize our commitment to follow the highest standards of ethical, honest and fair conduct

Policies

The purpose of the Code and of Prisma Health’s policies and procedures is to help those working for Prisma Health understand what is required of each individual. Policy sources include the following:

- Prisma Health policies applicable organization-wide to all team members
- Prisma Health departmental policies and procedures applicable to team members of a specific department and any team members and/or associated persons who enter that department on Prisma Health business

All team members need to become familiar with and follow all applicable organization-wide policies and procedures as well as all applicable departmental policies and procedures. If you are a member of the medical staff, you are required to become familiar with and comply with organization-wide policies, your professional requirements and responsibilities, and the Medical Staff Bylaws and policies, as well as any departmental policies and procedures applicable to the services you provide at Prisma Health.

Compliance is mandatory

Any team member, physician or associated person who, by action or inaction, does not comply with this Code or other applicable policies, laws, rules and regulations may be subject to disciplinary action. Such action may range from a verbal warning to being terminated from Prisma Health in accordance with our Human Resources Disciplinary Policy or the Medical Staff Bylaws, as the case may be.

If you need clarification

If any part of this Code is unclear to you or if you have a compliance matter or concern about an ethical or legal situation you may be facing, you may seek help in several ways:

- Talk with your supervisor or your department manager.
- Talk with your Human Resources partner.
- Talk with the Corporate Compliance Office.
- Call the toll-free Compliance Hotline (which you may call anonymously).

To report compliance concerns

- All team members are required to report any potential or actual violations of any law, regulation, policy or element of this Code they believe may have been broken. Not reporting such information may lead to disciplinary action, including termination.
- Reports may be made to your leader, Human Resources, Corporate Compliance Office or the Compliance Hotline. Complaints may be made anonymously.
- Alert leadership, Human Resources or the Corporate Compliance Office of possible illegal and unlawful acts, so they can be reported to the proper authorities.

To contact the Compliance Hotline

Prisma Health team members should call the Compliance Hotline at 1-888-243-3611 or submit online at www.complianceresource.com/hotline to make an anonymous report.

Nonretaliation

In compliance with federal and state laws that have served as the basis for these policies, Prisma Health will not take retaliatory action against a team member or other associated person because he or she in good faith:

- Has disclosed information about a situation the person believes is a violation of the policies or is illegal
- Has provided information in connection with an investigation of a complaint of a policy violation or illegal conduct
- Has objected to or refused to participate in any activity that is in violation of federal and/or state law, Prisma Health policy or accreditation requirements
- Is involved in any compliance review or peer review process
- Has filed what he or she believes is a valid or legitimate report, complaint or incident report

Service quality/patient care

Prisma Health, and therefore all team members and associated persons who work with Prisma Health, shall provide medically necessary care without regard to race; color; national origin; religion; age; sex; physical, mental or other disability; medical condition; sexual orientation; gender identity; gender expression; pregnancy; social, cultural or educational background; ancestry; marital status; citizenship or veteran status. Decisions about medical care are based on medical appropriateness.

Prisma Health, and therefore all team members and associated persons who work with Prisma Health, shall treat everyone involved – patients, families, teammates, members of the medical community and volunteers – with compassion, courtesy and respect. Prisma Health, and therefore all team members, shall listen to their concerns and offer encouragement and comfort.

The people Prisma Health serves should be informed about their medical condition and have input into their plan of care. Information on treatment/care, diagnosis and delays in care should be discussed with them by appropriate team members.

Prisma Health, and therefore all team members and associated persons who work with Prisma Health, shall respect the rights of the people it serves, including:

- Access to care (using available health services)
- Respect and dignity (taking personal values and beliefs into account)
- Privacy and confidentiality (respecting personal privacy and confidentiality of patient information)
- Personal safety (following safe hospital practices and maintaining a safe environment)
- Identity of team providing care (providing the name and professional status of care providers)

Laws, rules and regulations

Prisma Health, and therefore all team members, shall conduct business ethically and comply with all federal, state and local laws, rules and regulations related to the delivery of healthcare services. Prisma Health, and therefore all team members, shall comply with all other statutory and regulatory requirements that apply to each person and the organization's professional responsibilities, including, but not limited to:

- Conditions of participation for federal healthcare programs as outlined by the Centers for Medicare & Medicaid Services (CMS)
- Requirements of The Joint Commission accreditation standards
- Regulations related to our professional certification requirements

All Prisma Health team members must continuously strive to conduct themselves appropriately and professionally, in compliance with laws and regulations, and to avoid problems that may result from such misconduct or failure to comply with applicable laws. Prisma Health has implemented policies and procedures intended to detect and prevent fraud, waste and abuse, which include federal and state healthcare programs.

Contact with government and outside investigators

Prisma Health is committed to fulfilling its responsibilities to the community in an environment based on ethical behavior and in full compliance with applicable state and federal laws. From time to time, however, there may be instances when external government agencies may have reason to review or investigate Prisma Health activities. In these situations, the institution, individual team members and patients have legal rights that must be protected.

If you are contacted by an external government agency regarding Prisma Health business, we encourage you to immediately notify your supervisor and the Prisma Health Corporate Compliance Office. If the contact is made at home, without a search warrant or subpoena, we encourage you to request that the agent or investigator contact you at work the next business day, then immediately contact your supervisor and the Prisma Health Corporate Compliance Office. Under no circumstances should you provide any information without properly authenticating the investigator's credentials and the legitimacy of the request.

Physician Self-referral Law (Stark Law)

Federal and state laws and regulations govern the relationship between hospitals and physicians who may refer patients to the facilities. A critical federal law is commonly referred to as the Stark Law. It is important that physicians and those of us who interact with them – particularly in making payments to physicians for services rendered, providing them with space or services, recruiting physicians to the community and arranging for them to serve in leadership positions in hospitals – are aware of the requirements of the laws, regulations and policies that address relationships between hospitals and physicians.

If relationships are properly structured but not diligently managed, failure to administer the arrangements as agreed may result in violations of the law. Any arrangement with a physician must be structured to ensure compliance with legal requirements, Prisma Health policies and procedures, and any operational guidance that has been issued. Most arrangements must be in writing and reviewed by counsel representing Prisma Health. Failure to meet all requirements of these laws and regulations can result in serious consequences for Prisma Health.

Anti-kickback statute

The anti-kickback statute is prohibition against payments (in any form, whether direct or indirect) made purposefully to induce or reward the referral of items or services reimbursed by any federal healthcare program (e.g., Medicare, Medicaid), or to solicit or accept something of value in exchange for such referrals. It covers

not only the offer or payment of value for patient referrals, but also the offer or payment of anything of value in return for purchasing, leasing, ordering or arranging for or recommending the purchase, lease or ordering of any item or service reimbursed (in whole or part) by a federal healthcare program.

Prisma Health, and therefore its team members, should never give or offer anyone something of value in hopes of getting referrals or as a reward for referrals, or solicit or accept something of value in exchange for referrals. The “something of value” doesn’t have to be just money. It also can be services, gifts, entertainment or anything else that would be attractive to a recipient.

- No team member should pay for patient referrals. Accept patient referrals and admissions based solely on the patient’s medical needs and our ability to render the services. Do not pay or offer to pay anyone – colleagues, physicians or other persons or entities – for referral of patients.
- Do not accept payments for patient referrals. No Prisma Health team member is permitted to solicit or receive anything of value, directly or indirectly, in exchange for the referral of patients. Similarly, when making patient referrals to another healthcare provider, do not take into account the volume or value of referrals that the provider has made (or may make) to Prisma Health.
- Regarding the purchase, lease or ordering of goods and services: Do not solicit or accept kickbacks or impermissible rebates or anything of value in exchange for the purchase, lease or contract of any such goods or services.

False Claims Act

To prevent any possible violation of the False Claims Act (FCA), do not submit or present for payment or approval any claim that is false, fictitious, exaggerated or fraudulent. If you discover that an error in billing has occurred, report it to your leader or the Corporate Compliance Office immediately.

Prisma Health team members must bill for only those goods or services that were actually provided and must properly code every service or supply. If personal knowledge is required to fill out a form, complete the form only if you have that personal knowledge. Any claim, bill or code that contains an error prior to submission should be corrected before submission, if possible. If the error is discovered after submission, it must be reported to Prisma Health’s Corporate Compliance Office.

Fraud, waste and abuse

Fraud is knowingly and willfully executing, or attempting to execute, a scheme to defraud any healthcare benefit program, or to obtain, by means of false or fraudulent pretenses, representations or promises, any of the money or property owned by, or under the custody or control of, any healthcare benefit program. In other words, fraud is intentionally submitting false information to the government or a government contractor to get money or a benefit.

Fraud includes, but is not limited to, embezzlement, misappropriation or other financial irregularities. People inside or outside of Prisma Health can perpetrate fraud for the benefit of, or to the detriment of, Prisma Health. Fraud can take many forms, such as forging or altering Prisma Health documents, buying personal items with Prisma Health funds, padding travel expenses and embezzling or stealing checks or cash. Department heads and primary business administrators and other team members who have financial responsibilities should institute internal controls to prevent and detect fraud. Report suspected fraud immediately to your supervisor, the Corporate Compliance Office or the Compliance Hotline. Prisma Health will thoroughly investigate suspected instances of fraud.

Medicare defines waste as practices that, directly or indirectly, result in unnecessary costs to the Medicare Program and any other payor, such as overusing services. Waste is generally not considered to be caused by criminally negligent actions but rather by the misuse of resources.

Waste may also include the spending of money or use of resources in a careless or in an inefficient manner. Buying items not needed or paying too much for items are common forms of waste. Discarding usable property and carelessly allowing property to be damaged or destroyed are other forms of waste. Waste includes inefficient or excessive use of expendables such as copier paper, heating, cooling or electricity. Be conscious of possible waste. Avoid using Prisma Health resources carelessly. If you see wasteful conditions in your work area, bring them to the attention of your supervisor or the Corporate Compliance Office.

Medicare defines abuse as actions that may, directly or indirectly, result in unnecessary costs to the Medicare Program and other payor. Abuse involves paying for items or services when there is no legal entitlement to that payment and the provider has not knowingly or intentionally misrepresented facts to obtain payment.

Abuse may also be defined as improper or excessive spending or use of resources. Abuse may not entail violation of any law, regulation, contract provision or grant stipulation. Abuse may result in failure to meet the public's expectations for prudent conduct and may damage the credibility of the organization. For example, abuse may include buying extravagant furnishings for conference rooms, holding expensive dinners or staging conferences in exotic places. Although these practices may not be illegal, they waste valuable resources and erode public confidence in Prisma Health. They must be avoided.

Confidentiality and HIPAA

The purpose of the Health Insurance Portability and Accountability Act, known as HIPAA, is to improve the efficiency and effectiveness of the healthcare organization and to require reasonable protection of personal health information.

HIPAA regulations are intended to protect medical records and other personal health information – in all forms – maintained by healthcare providers, hospitals, health plans, health insurers and healthcare clearinghouses. Under HIPAA privacy standards, patients have increased control over the use and disclosure of their health information and are guaranteed certain rights regarding their health information. These rights include the following:

- The right to access to protected health information (PHI)
- The right to request amendments of PHI to correct inaccuracies
- The right to receive Notice of Privacy Practices
- The right to request restrictions of the uses and disclosures of PHI
- The right to request information about how confidential communications are handled
- The right to receive an accounting of disclosures

General guidelines for compliance with HIPAA:

- HIPAA rules were not designed to limit the information used to treat a patient. If not disclosing a patient's information would delay treatment or decrease the quality of treatment, disclosure is not likely to be a privacy violation.
- Use reasonable safeguards to protect patients' health information. Examples of reasonable safeguards include turning computer screens away from public view; using strong passwords; and not discussing patient health information in elevators, cafeterias and other public places.
- Pay attention to detail to avoid inadvertently disclosing private health information by use of an incorrect fax number or through failure to confirm the proper identity of the patient.
- Use confidential information only as needed to do your job. Share information only as needed to do your job and release information only as required by the operations and business affairs of Prisma Health with approval of leadership.

Additional confidentiality considerations:

- Protect the confidentiality of information in computer systems and be responsible for information obtained through your login ID. Do not share your login ID.
- Share information about computer software, its design or its operation only as necessary to do your job.
- Respect the confidentiality of the prices, terms and conditions of sale that suppliers submit to the organization. This information is shared internally only and on a need-to-know basis.

The 21st Century Cures Act and information blocking

Information blocking is the practice of interfering with access, exchange or use of electronic health information (EHI). Prisma Health empowers patients with access to their health information. Putting patients first through health technology allows Prisma Health to deliver patients convenient access to their records via MyChart and through advances in innovative information and systems communication technology.

There may be, however, situations when Prisma Health, within applicable laws and regulations, denies patients access to their EHI. In those circumstances, patients may request a review of the denial by Prisma Health authorized individuals.

Compliance with this policy will be monitored.

Electronic communications

Electronic communication systems made available to team members and associated persons are provided for the efficient completion of work-related assignments and remain Prisma Health property. Therefore, such electronic communications are to be used primarily to conduct Prisma Health business.

Although users may be assigned individual passwords, all email messages, voicemail messages, internet access, computer files or other electronic communications are Prisma Health records. The content of all electronic communications properly obtained for legitimate business purpose may be disclosed without permission of the team member. Therefore, users have no reasonable expectation of privacy with respect to communications transmitted by Prisma Health-owned electronic communications systems, and all such messages remain Prisma Health property. Electronic communications are accessible at all times by Prisma Health and may be monitored at any time for any business purpose.

Prisma Health team members are reminded that any electronic communication sent from Prisma Health to a publicly held entity (e.g., CMS, DHEC, school districts, state-run universities and others) are discoverable through the Freedom of Information Act (FOIA).

Property

- Supplies, equipment and property bought and owned by Prisma Health should be used only for business purposes unless otherwise authorized by leadership. Unauthorized use of Prisma Health property is considered theft.
- Prisma Health supplies and equipment should be protected against loss or abuse, including supplies and equipment used for direct patient care and those used by departments in day-to-day business.
- Used equipment, supplies and materials should be disposed of in the manner approved by leadership and according to laws and regulations.
- Computer software and hardware that Prisma Health owns or operates to conduct Prisma Health business should be used only pursuant to and consistent with the requirements of software copyright licenses.
- All hardware and software analysis, design, coding, testing, installations, upgrades and/or changes belong to Prisma Health, unless a contract states otherwise.

- All intellectual property, including patents and inventions, belong to the organization unless agreed on otherwise.

Hiring or retaining excluded individuals or entities

Prisma Health does not knowingly hire, retain, employ or contract with individuals or entities who have been excluded from participation in any government program.

Similarly, Prisma Health will not knowingly conduct business or continue to conduct business with any individuals or entities (whether independent contractors, subcontractors, suppliers or vendors) who have been excluded from participation in any government program.

An appropriate background search as required by Prisma Health policies will be performed for each new Prisma Health team member or proposed team member. Retaining or contracting independent contractors, vendors and/or other business associates must be conducted in compliance with Prisma Health policy regarding exclusion from government programs. Team members and associated persons shall advise Human Resources or the Corporate Compliance Office if any action is taken that impacts or limits their eligibility to participate in government programs.

Harassment and disruptive behavior

- Prisma Health maintains an environment free from harassment, including harassment based on race; color; national origin; religion; age; sex; physical, mental or other disability; medical condition; sexual orientation; gender identity; gender expression; pregnancy; social, cultural or educational background; ancestry; marital status; citizenship; or veteran status.
- Harassing conduct or disruptive behavior in the workplace, whether physical or verbal, is prohibited.
- Please be aware that unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature may constitute sexual harassment when (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or employment status, (2) submission to or rejection of such conduct by an individual is used as the basis for employment or academic decisions affecting that individual, or (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Equal opportunity

- Prisma Health is an equal opportunity employer.
- Discrimination of any kind based on race; color; national origin; religion; age; sex; physical, mental or other disability; medical condition; sexual orientation; gender identity; gender expression; pregnancy; social, cultural or educational background; ancestry; marital status; citizenship; or veteran status is not allowed. This applies to employment, education, providing services to the public and working with Prisma Health team members.

Drug-free workplace

- Prisma Health maintains a drug-free workplace. No team members or associated persons should report to work either in person or remotely while under the influence of controlled or illegal substances or substances of abuse.
- Legal drugs may also affect the safety of the team member or fellow team members or members of the public. Therefore, any team member who is taking any legal drug that the prescribing physician or pharmacist indicates might adversely affect the team member's ability to safely perform the functions of his or her job must advise his or her supervisor before reporting to work under such medication.
- To use, own, make, sell, distribute or provide any substance of abuse or associated item illegally on company property is not allowed.

Workplace flexibility

All Prisma Health team members must abide by the Workplace Flexibility policy and, if required, sign the Workplace Flexibility agreement.

Environmental health and safety

- Prisma Health is committed to providing a safe and healthy work environment. At the core of any safe and healthy work environment is having all team members and associated persons follow rules and regulations related to environmental health and safety, including the use of buildings, property, laboratory processes, chemicals and materials, and medical equipment products.
- All team members and associated persons should practice safety in daily activities by using best practices, engineering controls (fire doors, needle boxes, etc.) and personal protective equipment to ensure their safety and the safety of others.
- All team members should report all incidents and accidents involving people, products, property and care. Part of the purpose of reporting is to improve quality and avoid similar accidents.
- Any suggestions for how to make Prisma Health safer and healthier are welcome and may be directed to your supervisor, Prisma Health Human Resources Department or to the Corporate Compliance Office.
- Supervisors, managers and administrators have additional responsibilities for maintaining a safe and healthy environment. They create and put in place practices that promote health and safety, and they orient and train team members and associated persons in these practices on an ongoing basis.
- Because of the work being performed at Prisma Health, the organization stores drugs, pharmaceuticals and radioactive materials. Prisma Health strives to store and use these products safely and in conformance with all rules and regulations related to the product(s). Prisma Health strives to keep proper inventory records for these products. If you use or consume any of these materials as part of your work for Prisma Health, notify the Prisma Health team member responsible for tracking inventory and storage of these products. If you discover that materials or products are missing or have been taken improperly or stolen, report this information to Prisma Health leadership or the Corporate Compliance Office immediately.
- All team members are expected to dispose of medical waste, environmentally sensitive materials (batteries, cleaning fluids, etc.) and other hazardous material correctly.
- All team members are expected to familiarize themselves with Prisma Health disaster and code situations and to know their duties for each situation.

Conflicts of interest

Prisma Health team members are generally prohibited from engaging in any activities that could reasonably be expected to create a substantial conflict between the team member's private interest and his or her responsibilities as a Prisma Health team member. This includes participating directly or indirectly in a business interest, engaging in a professional activity or incurring an obligation that might reasonably tend to influence one's discharge of official duties. Prisma Health team members are generally prohibited from transacting official Prisma Health business with business entities for which they serve as officers, agents or board members. Prisma Health team members may not conduct official Prisma Health business with businesses in which they also own a substantial interest.

Prisma Health has a Conflict of Interest Policy. Also important is the related Individual Conflict of Interest Disclosure Statement (Disclosure Statement). Leadership, employed physicians and others as required by the Corporate Compliance Office must complete the Disclosure Statement annually or when a possible conflict of interest situation arises. All team members need to become familiar with the Conflict of Interest Policy and comply with its terms. Whenever in doubt regarding a possible conflict of interest, you must complete the Disclosure Statement and review the matter with your supervisor.

The following Conflict of Interest rules apply to all team members:

- Do not conduct business with Prisma Health on your own behalf or on behalf of a business you own or are employed by without express approval pursuant to the provisions of the Conflict of Interest Policy.
- Disclose any and all outside interests that may present a possible or apparent conflict of interest as set forth in the Conflict of Interest Policy.
- Avoid situations where actions or inaction may conflict with the best interests of patients.
- Prisma Health team members engaged in research should contact the Office of Research Administration for any additional disclosure requirements.
- Avoid situations where action or inaction may conflict with best interest of Prisma Health by interfering with your ability to perform your job duties effectively and objectively. For example:
 - Decline any and all personal gifts or benefits from patients, families, suppliers or agents that are meant to, or which may appear to, influence you in doing your job.
 - Do not ask for personal gifts of any kind from the people Prisma Health serves or their families, or from Prisma Health suppliers, potential suppliers or agents, or the employees or associates of a supplier. (The term "supplier" applies to anyone providing goods and/or services to Prisma Health.)
 - Discuss outside employment opportunities with Human Resources and your supervisor if a potential conflict of interest may exist. (Managers are required to report any outside employment.)
 - Do not hire family members to be under your direct supervision or influence the employment, appointment, promotion, transfer, advancement, compensation or disciplinary action of a relative within Prisma Health.
 - Do not personally own a business, deal with family or friends who own a business, or share any information that impacts your decision-making or creates a reduction in competition.
 - Do not use any Prisma Health facilities, equipment or resources for any personal use, including, but not limited to, any political campaign or related activity.
 - Do not invest in competitors' or suppliers' businesses other than to hold stock in a publicly traded corporation.

Research with human participants

Safeguarding human participants in research is of utmost importance. When designing a study, investigators should think first about the study's impact on human participants. If you are involving human participants in research, you must have training in the policies protecting the rights and welfare of human participants in research. This requirement applies to all team members and associated persons who conduct or collaborate in research using human participants or private information about humans.

Prisma Health's Office of Human Research Protection maintains training records for determining the investigator's qualifications for conducting human participant studies. You must have on file proof you have taken the training if you:

- Interact directly with participants in any aspect of a research activity
- Conduct or supervise research engaging human participants or containing protected health information about human participants and you use any property or facility belonging to Prisma Health
- Use nonpublic information kept at Prisma Health to identify or contact human research participants or prospective participants
- Collaborate on any part of a research activity involving human participants conducted at Prisma Health
- Have access to participants' research records, to the identity of participants in research, or to medical records or other protected health information used in a research activity

Consult the Prisma Health Office of Human Research Protection for information related to training requirements and options.

Finance and billing participants

- Bill only for care and services provided that are properly authorized and documented as medically necessary in the medical record.
- Maintain all billing records accurately and truthfully in compliance with applicable regulations and record retention requirements: Billing information should be handled according to laws and regulations related to confidentiality.
- Never misrepresent services, supplies and equipment furnished to avoid coverage limits or to increase payments.
- Understand that certain government regulations and many insurers require that customers (beneficiaries) be billed for co-insurance and deductibles; therefore, we do not routinely write off these costs.
- Report concerns regarding the appropriateness of Prisma Health billing practices to leadership or to the Corporate Compliance Office.
- Answer billing questions, correct billing errors and alert payors of errors in submitted bills appropriately and in a timely manner.
- Provide charity care according to Prisma Health charity guidelines based on family size, income and assets.

Proper accounting

- Team members should strive for proper and accurate accounting for all Prisma Health work. Financial records and statements should be prepared accurately and honestly according to generally accepted accounting principles.
- Team members should follow all administrative and internal control procedures (checks and balances) that safeguard the assets and funds of Prisma Health, check the accuracy and reliability of accounting data, and ensure that we follow laws and regulations.
- Team members should cooperate fully with internal and outside auditors and any regulatory agencies, after appropriate verification of authority and scope have been determined, during any and all examinations of Prisma Health books and records.
- Team members should always obtain legal review of contracts with outside vendors, doctors, payors and consultants.

Cost reports

Prisma Health hospitals are required by laws and regulations to submit certain reports of operating costs and statistics. All team members should comply with these laws, regulations and guidelines relating to all cost reports. These laws, regulations and guidelines define what costs are allowable and outline the appropriate methodologies to claim reimbursement for the cost of certain services provided to program beneficiaries. Given their complexity, all issues related to the completion and settlement of cost reports must be communicated to or coordinated with the Prisma Health Revenue Cycle Department.

Retention and disposal of records

Prisma Health recognizes the need for orderly management and retrieval of all official records and maintains an active and continuing records management program in compliance with Prisma Health policy and state and federal requirements. The program identifies confidential and vital records and ensures appropriate retention and disposition. Do not remove or destroy official records (including electronic information), except in accordance with the approved retention and disposition policy. Any records under pending or active

investigation may not be disposed of or destroyed until the investigation is completed and the predesignated retention period is satisfied. If you have questions about specific record retention requirements, consult the Prisma Health Record Retention policy.

Marketing

Marketing and advertising information should always be truthful and should never intend to mislead. Claims about Prisma Health services should always be based on facts.

Corporate Compliance Office

The Corporate Compliance Office develops, implements and operates the Compliance Program. The purpose of the Compliance Program is to develop a culture that promotes ethical behavior, helps resolve ethical and regulatory issues within the organization, and bolsters Prisma Health's commitment to the highest standards and compliance with all applicable laws, regulations and internal policies and procedures.

The Compliance Program is designed to prevent, detect and correct violations of the laws and policies applicable to Prisma Health.

Measuring program effectiveness: audits and self-monitoring

Prisma Health is committed to assessing the effectiveness of the Compliance Program through various means. Much of this effort is provided by the Corporate Compliance Office, which routinely conducts audits of issues that have regulatory or policy compliance implications. In addition, each Prisma Health business unit is required to conduct self-monitoring in support of regulatory and policy issues.

Corporate Compliance Office

Team members can contact the Corporate Compliance Office for help in understanding Prisma Health policies and regulations. The Corporate Compliance Office is available at any time to report a concern related to ethics, policies or regulations.

Compliance Hotline

The Compliance Hotline provides team members with a way to report their concerns confidentially and, if desired, anonymously. Callers do not need to give their names or any other identifying information when reporting a concern. The Compliance Hotline is operated by an independent outside firm to further protect anonymity. Team members who report concerns in good faith can do so without fear of reprisal or retaliation.

We will make no attempt to discover the identity of anonymous callers, and we will maintain reasonable safeguards to protect the identity of callers who identify themselves but wish to maintain confidentiality.

Team members should call the Compliance Hotline to report concerns about possible unethical or illegal practices within Prisma Health. A report of the call is forwarded to the Corporate Compliance Office for investigation.

Prisma Health team members should call the Compliance Hotline at 1-888-243-3611 or submit online at www.complianceresource.com/hotline to make an anonymous report.

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