



MISSION HOSPITAL

Mission Integrity Our Values At Work

Question & Answer Booklet

A MESSAGE FROM THE PRESIDENT

I welcome each of you to “Mission Integrity: Our Values at Work.” Integrity is one of our core values and is of great importance. Integrity is our personal guideline to ethical behavior in everything we do and it simply means always be honest and do the right thing in any given situation. The very personal and sensitive nature of providing health care involves ethical responsibilities to our patients, to the community, to our business partners, and to one another. Our care for each patient is a sacred trust. We strive to ensure that all our actions are above reproach.

Today the community and our government have an interest in monitoring health care providers and the ethics of our behavior. While most of the health care industry does operate with the highest integrity, we have read and heard about fraud and abuse. It is wrong and it must be stopped. Through “Mission Integrity” we combine our core values and emphasis on business ethics with a voluntary proactive program of corporate compliance to prevent fraud and abuse at Mission Hospital. At the same time, we will be ensuring that we treat one another, every patient, and business partners with the utmost dignity and respect.

This booklet is a guide for all Mission team members. It explains how to be certain that we bring integrity, ethics, and values to our work. It provides many examples of work-related situations and exactly what integrity means in each situation. It also poses a number of questions that may come to your mind about the right action for a given situation. This handbook

cannot answer every question. Those that are not answered should be taken up with your supervisor or the Corporate Compliance Officer who can be contacted at 213-3523.

You may have a question about the ethical aspects of a situation or you may become aware of actions and behaviors that do not appear to be ethical to you. Ethical questions are complex and should be discussed with your supervisor or another person knowledgeable about the subject. If you are still unable to come to a conclusion or think the answer is unsatisfactory, Mission Hospital has a Corporate Compliance Officer whom you may call at 213-3523. The information you have or the questions you have about actions you have witnessed or suspect are unethical are important. There will be no retaliation for your report and you are assured of anonymity or confidentiality up to the limits of the law.

We want the best for our patients, for our community, and for our team members. Living up to "Mission Integrity" is our pledge that we can be counted on to always do the right thing.

Joe Damore

Mission Integrity
Our Values At Work

Table of Contents

Corporate Compliance	3
• What is Corporate Compliance?	3
• Why is Compliance Important?	3
Questions & Answers	4
Communicating Your Concerns	12
• Who's Responsibility Is Mission Integrity	12
• How To Communicate When You Suspect Unethical Behavior	13
• Report Options	13
• Using the Mission Integrity Toll Free Hotline	13
Questions & Answers	14
Contact By Outside Agencies	16
• List of Departments That May Need to be Contacted	17

*Integrity
is doing the right thing
by being honest in our
interactions with one another,
our patients,
and our business contacts.*

CORPORATE COMPLIANCE

What is Corporate Compliance?

Healthcare corporate compliance refers to our ability to participate within the rules, regulations, and policies created by the government, and insurance programs and payers. Mission Hospital has created policies with which we must abide. You might not feel the impact of some of our compliance measures, such as those outlining the correct billing process, but you certainly are familiar with several others. For instance, we must comply with rules for treating emergency patients regardless of their ability to pay (EMTALA). Additionally, if you work with patient information, you have probably been told not to discuss a patient's condition in public areas of the hospital.

Healthcare professionals tend to relate healthcare corporate compliance to antifraud and abuse measures. Healthcare organizations that are not in compliance with certain government rules and regulations face harsh penalties that could result in exclusion from government-sponsored programs such as Medicare and Medicaid.

Organizations suspected of fraud or abuse must deal with government audits, reviews, and interviews of employees. These investigations usually result in costly civil monetary settlements. In addition, these organizations often must negotiate and operate under a corporate integrity agreement, which is a government-designed compliance program. Settling organizations usually must enter into these corporate integrity agreements to continue participation in government-sponsored health programs.

Why is compliance important?

By designing and implementing Mission Integrity, our corporate compliance program, we have made a commitment to foresee errors and prevent them from happening. Also, should we detect an error - an incorrect billing practice, for example - after it was made, our compliance program could reduce the amount of the settlement with the government and lessen the demands of the corporate integrity agreement.

Mission Integrity is our commitment to compliance. It is up to us to take personal responsibility for our own actions and behaviors. This means adhering to our MERIT standards of behaviors including standing against unethical behavior and exhibiting integrity in our interactions with one another, our patients and our business contacts. For more information about Mission Integrity and its program elements, go to the Mission Integrity webpage on the InsideMission intranet.

QUESTIONS AND ANSWERS

By demonstrating our integrity, we assure ourselves, our community, and the government that we are in compliance with the legal guidelines to ethical behavior between businesses that protect the community from business improprieties, and financial abuses.

Q: What is the Corporate Compliance Code of Conduct?

A: The Corporate Compliance Code of Conduct is the same thing as the MERIT Standard of Behavior for Corporate

Compliance. For regulatory compliance purposes, Mission's Code of Conduct is incorporated into the MERIT Standards of Behavior under the heading of Corporate Compliance.

The standards are as follows:

- Honor patient rights
- Provide quality care
- Keep patient information confidential
- Provide medically necessary care to patients
- Make clinical decisions based on patient need rather than financial issues
- Abide by the spirit of laws, rules and regulations, policies and procedures
- Disclose accurate information
- Avoid conflicts of interest
- Adhere to Federal and State coding and billing regulations
- Provide patients freedom of choice for referral services
- Refuse cash gifts from patients and vendors
- Avoid use of hospital resources for personal gain
- Keep accurate records
- Refuse bribes or kickbacks
- Avoid unfair trade practices
- Fill out reports accurately
- Report time correctly
- Avoid making political contributions with hospital funds
- Provide factual, truthful information in marketing and advertising activities
- Abiding by anti-kickback, Stark self-referral or other Federal and State regulations
- Report compliance concerns without fear of retaliation

These standards are contained in the MERIT booklet and are explained in more detail in the attachment to the Corporate Compliance Policy #200.060 entitled, "Mission Integrity – Our Values at Work, Code of Conduct".

Q: I hear the terms OIG and DOJ frequently. What do these mean?

A: More government agents and government-hired contractors are on the lookout for provider noncompliance than ever before. They are well funded, and through the years, they have nearly perfected the science of identifying potential errors and the art of negotiating settlements. Below is a list of the major enforcers of healthcare corporate compliance:

- The Department of Health and Human Services' Office of Inspector General (DHHS OIG) represents DHHS's enforcement operations. OIG representatives investigate suspicions of healthcare fraud and abuse and negotiate corporate integrity agreements. In addition, the agency provides compliance education and guidance to the industry.
- The U.S. Department of Justice (DOJ) prosecutes healthcare organizations for healthcare fraud and abuse.
- The Federal Bureau of Investigation (FBI) assists the Justice Department by investigating suspected healthcare fraud. The FBI's healthcare fraud unit continues to grow and is funded under the Health Insurance Portability and Accountability Act (HIPAA) of 1996.

- The Center for Medicare and Medicaid Services (CMS) is recognized primarily for its rulemaking authority. However, since it is responsible for Medicare, under CMS's integrity program it has contracted private organizations to review Medicare claims. These contractors look for abnormalities that might result in increased reimbursement.
- State Medicaid Fraud Units (MFU) use the techniques devised by the federal agencies to spot possible fraud and abuse in state programs.
- Medicare Administrative Contractors (MAC's) are a new payment processing initiative to have one claims Administrator for Parts A and B Medicare fee for service benefits. They focus on financial management and payment accuracy

Q: What is meant by fraud?

A: Fraud includes:

- Crimes of guilt and deceit
- Material false statements or representations uttered or made to obtain some benefit to which one is not entitled
- Violations that occur when committed for self or on behalf of another party
- Acts performed knowingly, willfully, and intentionally
- Violations that warrant criminal, civil, or administrative Action
- Civil fraud, which has a lower standard of proof and penalties than criminal fraud

Q: What is meant by abuse?

A: Abuse includes:

- Practices resulting, directly or indirectly, in unnecessarily increased costs
- Overuse of medical services, products, or both
- Medically unnecessary services or products
- Failure to conform to professionally recognized code
- Unfair and unreasonable pricing
- Restrictions of patient choice
- Restrictions on competition

Q: I have heard of something called the False Claims Act. What is this?

A: The federal False Claims Act imposes civil liability on organizations (and individuals) that make or cause false or fraudulent claims to the government for payment. A False Claims Act violation can result in penalties of up to \$11,000 per false claim, plus three times the amount of damages that the government sustains. In addition, the government can exclude violators from participating in the Medicare, Medicaid, and other government programs.

Twenty-three states, including North Carolina have adopted State False Claims Acts. The State False Claims Acts are state level extensions to the Federal False Claims Act established to further enforce false claims law and add state penalties. Several states including North Carolina has also

enacted False Claims Act Whistleblower Protection Laws as part of protecting reporters of alleged fraud.

Q: Could you please explain what the federal anti-kickback statute is?

A: The Social Security Act prohibits the offer, payment, solicitation, or receipt of any form of remuneration in return for the referral of Medicare or Medicaid patients. Violation of the anti-kickback statute is considered a felony, punishable by fines up to \$25,000 per violation, plus imprisonment for up to five years. Also, the Department of Health and Human Services may impose civil penalties and exclude violators from government health programs. It is important to note that there are exemptions and safe harbors to the statute (listed on the DHHS OIG website at www.oig.hhs.gov).

Q: Our department has a great basketball tournament pool. It involves money and some people say it's gambling. Should I participate in the pool?

A: Win or lose, gambling at work is wrong. Let co-workers know that gambling is not allowed before the next sports tournament.

Q: What is the Physician Self-Referral Law?

A: The Physician Self-Referral Law, commonly called Stark II, prohibits physicians from making certain Medicare referrals to entities with which the physician (or her/his family members) has a financial relationship. Similar to the anti-kickback statute, this law has exceptions. This is perhaps the most complex law regulating the healthcare industry. Stark II provides a variety of sanctions, including denial of payment, refund of payment, civil monetary penalties, and exclusion from Medicare and Medicaid. If you need additional information regarding this law, please contact the Legal Department.

Q: We keep hearing about abusive billing practices in healthcare. Can you please give us some examples of this?

A: Government agencies, along with the fiscal intermediaries, are on the lookout for billing practices that could indicate fraud or abuse. Below is a short list of just some billing practices that might result in government scrutiny:

- Billing for noncovered services, supplies, or both
- Altering claim forms to receive increased reimbursement without necessary documentation
- Duplicate billing for a single service
- Misrepresentation of facts on the claim, such as services rendered and dates of services or charges
- Failing to return overpayments in a timely manner to the appropriate fiscal intermediary
- Using default billing codes to justify diagnostic billing

codes when proper billing codes would be for noncovered services

- Unbundled laboratory services from a panel to be billed individually at a higher rate
- Billing for medically unnecessary services

Q: What is the Deficit Reduction Act?

A: The Deficit Reduction Act (DRA) is new legislation which impacts many domestic entitlement programs, including Medicare and Medicaid. Effective January 1, 2007, the Deficit Reduction Act dramatically strengthens federal action to fight Medicaid fraud by providing additional funding and resources to the effort. The legislation creates a new Medicaid Integrity Program, funded with \$5 million dollars in 2007, for Medicaid fraud enforcement. By fiscal 2009, the Medicaid Integrity Program will become a \$75 million dollar per year operation. The DRA also requires healthcare entities receiving \$5 million dollars or more in Medicaid payments per year to educate their employees about the federal False Claims Act and the entity's internal policies and procedures for detecting and preventing fraud, waste, and abuse.

Q: Whose responsibility is it to understand the laws and regulations in my work area?

A: It is everyone's responsibility at Mission Hospital to become familiar with the policies, procedures, laws,

rules and regulations that relate to our work and protect our workplace. Find out where your department's policy manual is kept. If you are unclear on a matter, check with your supervisor. If he or she cannot satisfy your questions, check further. If need be, you may call the Corporate Compliance Officer at 213-3523.

Q: My supervisor informed our shift that information sent on e-mail is public information. Is this true since we have passwords to protect from unauthorized access?

A: Yes, e-mail information is considered public information even though you have a password. Court cases have ruled that electronic mail messages can be reviewed and used without infringing on employee rights. This presents a problem when confidential information is being sent using electronic mail. Messages using inappropriate language or comments can lead to corrective action.

Q: My friend told me something in confidence that I think might relate to unethical behavior. If I tell someone, will I betray her confidence?

A: These situations are difficult. Tell your friend that there is something that you must discuss with her and that the two of you may need to report. In the future, before someone confides in you, you may want to tell them that you are interested in listening but that you might have a responsibility to report it.

Q: How can I learn about the laws that relate to my specific department?

A: There are a variety of resources such as policy manuals that spell out exactly what is expected in the workplace. Ask your supervisor where they are kept and review them. If you have questions about anything you read, ask your supervisor for further explanation. Your supervisor has been instructed to be certain that everyone understands the policies, rules and regulations under which we work.

Q: An employee who is well known in the hospital was admitted as a patient. I came onto the unit and found the staff, including a non-attending physician, reviewing his information on the computer system. This seems like it breaks confidentiality. What should I do?

A: You are right that this is a breach of confidentiality and is an invasion of privacy. You should speak to the staff members and physicians and remind them of our rules. If this does not stop them, you should report this to your supervisor. If it still does not stop, you should report it to the Information Security Officer at 213-0330.

Q: I am a nurse. A new resident came on my unit to perform a lumbar puncture on a patient. I had never seen this resident before and she did not appear to have done this procedure before. What should I have done?

A: First, speak to the resident and find out if she is allowed to perform this procedure. If she says "yes", contact the attending physician to show your concern. If she says "no", or "not sure", advise her to obtain direct supervision by the attending physician.

Q: I'm a nurse in charge of a patient in ICU who is unresponsive. I came into the room and found the patient's son reading the chart. What should I do?

A: First find out why the chart was left in the room. Charts are to be left at the nursing station. Inform the son that only the patient or the patient's representative can read the chart. Let him know you would be happy to help him contact the attending physician regarding his mother's condition.

Q: As a manager, I was planning on signing a contract with a certain vendor. Subsequently, I found out I could get a free computer and software from them. Since I was already going to give them the business, is it alright to accept their gift?

A: No, accepting such a substantial gift could give the appearance of a bribe or kickback. We never want such behavior associated with Mission Hospital. For a better understanding, check the Conflict of Interest and Acceptance of Business Courtesies policies.

Q: A local physician has asked Mission Hospital to sell him

supplies for his practice at our cost. Can we provide this service?

A: No, we cannot provide this service unless it is a product that we normally sell at our cost to anyone who requests it. Such a practice can be interpreted as a bribe. It could also be a violation of supply contracts and there might be sales taxes involved that wouldn't be properly paid.

Q: I am aware of inaccurate billings for my areas, but have been told to process the accounts anyway because we're behind in our daily work. I was told we will make adjustments later. How should I handle this?

A: You are right to question this. Federal and state regulations specifically prohibit intentional billings that are incorrect. We cannot do this even if we intend to go back and make adjustments at a later date. If this is going on, it puts the Hospital at risk. Report this to your supervisor. Or if your supervisor is aware of it and has not stopped the practice, report it using the options on page 13.

Q: I am active in political campaigns and have given donations in support of various candidates. Is this a conflict of interest with my position at Mission Hospital?

A: As long as you are contributing your personal time and money to public campaigns, there is no problem. That it is a personal contribution should be clear and it should in no

way appear to be a contribution or representation of Mission Hospital. Unless you are representing the Hospital, you should volunteer time only during your non-business hours.

Q: In an attempt to price fairly, it has been a common practice in my department to have someone call other hospitals providing our same service to see what they are charging for the service. Is this all right?

A: This is very sensitive because there is the possibility of seeming to participate in price fixing which is seen as an unfair trade practice. If the information you use is published for everyone's use, it is likely public information and alright for us to use. However, if the information is not public, it is not appropriate to call and obtain market information from our competitors. If you have doubts about this, call the Legal Department or the Corporate Compliance Officer.

Q: What is meant by kickbacks or incentives for patient referrals?

A: This is another sensitive area of the law. Basically it includes anything of value given to a person who is in the position to influence the referral of patients. It can be excessive discounts, supplies or equipment, gifts, write-offs of account receivables, professional courtesies, or leases at less than fair market value, to name a few examples. If you have any question about what might be seen as a kickback,

ask your supervisor about it. Your supervisor may refer you to the Legal Department or the Corporate Compliance Officer.

Q: We are struggling to further reduce our costs and I am tempted to not reveal all the cost information in negotiating a particular contract. I would not be lying, I just wouldn't be giving all the information. Is this OK?

A: It is our duty to disclose all current, accurate, and complete cost information when negotiating contracts.

Q: Sometimes patients and their families and friends make donations to programs here at Mission Hospital. Should I accept these contributions and how should I handle the records and the funds?

A: We are grateful for the contributions made to Mission Hospital and are pleased to honor the request. We would prefer that such donations be delivered to our Foundation. There are procedures that should be carefully followed. These include not accepting cash. Ask your supervisor or call the Foundation about any questions you may have regarding donations.

Q: Is it against the rules for members of my family to provide services or products to Mission Hospital?

A: Not necessarily, but this could be a conflict of interest. Please refer to our Administrative policy "Conflict of Interest" on the Hospital Intranet. That will tell you the standards that have been developed for immediate family members to provide services to the Hospital. If you have questions, ask the Corporate Compliance Officer.

Q: I have friends that work for competing health care systems. When we are socializing, sometimes the topic of work arises. Are there topics that should not be discussed?

A: The information that comes to you through your employment at Mission is always to be considered confidential wherever you are. This applies to all information but is especially true of employee, patient, or proprietary information.

Q: I have seen reports thrown in the trash that have printed financial and business information on them. Is this considered confidential?

A: Printed financial and business information is confidential and confidential information should be placed in confidential materials containers. Each department needs to evaluate the types of information thrown in the trash each day. Your supervisor is probably in the best position to make those decisions.

Q: I am a new employee at Mission Hospital. Until I receive my own userid and password, is it OK to use someone else's?

A: No. Your password is your computer signature and you are responsible for anything that is done using your password. Passwords will need to be reissued if someone else has used it. Please call the Computer Services (CS) Help desk at 213-0350 to have your password reissued.

Q: Is personal use of e-mail OK?

A: Very limited personal use is acceptable as long as it does not interfere with your job duties. However, chain letters, offensive material or personal business matters are strictly forbidden. Please see the administrative policy, "Electronic Mail Usage".

Q: I have been asked to speak at various monthly professional meetings on health care topics. Is this permitted?

A: Yes, we encourage employees to participate in community and professional meetings. Bear two things in mind. You want to make it known to the group you are addressing that your speech does not necessarily represent the views of Mission Hospital. And if you are speaking on Hospital topics, it may be helpful to review your material with Marketing and Communications so that we can be assured of delivering a consistent message to the community.

Q: I received a notice from Medicare several weeks ago about some alleged billing errors and have not forwarded it to legal or compliance departments or to patient accounting because I only now realized what it was. What should I do at this point?

A: Notify your supervisor and then contact the Legal Department or Corporate Compliance Officer immediately. Keep a copy for yourself. Usually, when we receive these notices, there is a time frame for responding and that is why it is important to get the information to the proper departments as quickly as possible. Naturally, you will pay close attention to any future notices so that we can respond in a timely fashion.

Q: Can we copy other organizations' documents for our own purposes?

A: You want to determine whether a document has been copyrighted. If it is copyrighted, we cannot reproduce it without the prior written permission of the license holder.

Q: I am aware that some people in our department have copied software that they did not purchase onto their computer hard drives at work. Is there anything that I should do?

A: Yes. Remind your co-workers that copying someone else's licensed software is illegal, may result in penalties, and it might also introduce a virus into our computer system. You

will want to report the matter to Computer Services (CS) Helpline at 213-0350. Each person who is issued a computer user ID is required to sign a Computer User Security and Confidentiality Agreement. Failure to live up to that agreement can lead to corrective action.

COMMUNICATING YOUR CONCERNS

*Integrity begins within each one of us.
It is a set of personal ethics, the way each of us behaves.*

Whose Responsibility Is Mission Integrity?

When we live with integrity, the work we do and the organizations we belong to become associated with our integrity. People come to trust us and our organizations. Out of trust comes cooperation and through cooperation great things are accomplished. The great things we can each do and that Mission Hospital can do begin with our taking personal responsibility for our own ethical behavior. In our work, this means adhering to our MERIT Standards of Behavior, including standing up against unethical behavior.

How to Communicate When You Suspect Unethical Behavior
What we expect to see every day from the people around us is integrity and ethical behavior. Sometimes we may see unethical behavior. We cannot let unethical behavior continue or it will harm the way we work together and the trust the community has placed in us. If you observe something that you think is unethical, first, speak directly with the individual

concerned. If that does not correct it, speak with your supervisor. If the problem continues, you may choose from the options on this page.

Report Options

Call:

- Call Jeri Williams, Compliance Officer at 213-3523
- Phone the toll free hotline at 1-877-ETHICS1

E-mail:

- jeri.williams@msj.org

InsideMission:

- Use the intranet reporting options from any Mission PC
- Go to Mission On Demand
- Click on Departments and enter Corporate Compliance
- Go to the link for Mission Integrity Page
- Select one of the reporting options

Integrity Report form:

- Complete the Integrity Report form

All reports should be made in good faith. There will be no retaliation for expressing your concerns or passing along information about situations that seem questionable to you as long as they are done in good faith. Confidentiality is maintained.

Using the Mission Integrity Toll Free Hotline 1-877-ETHICS-1
If for some reason, you are uncomfortable taking your concerns to your supervisor or others, use the Integrity Hotline. It is a non-traceable number and your confidentiality will be protected to the full extent of the law. The number is available 24 hours a day. You do not need to fear for your job if you use the Hotline. You will hear a recorded message that will guide you through a series of questions.

QUESTIONS AND ANSWERS

Q: What kinds of issues should I report through the Integrity Hotline?

A: We encourage calls to report suspected violations of federal or state laws and regulations related to improper coding or billing practices. The Hotline is not intended to handle human resources matters such as salaries, benefits and personnel issues. For these types of issues, contact your Human Resource Representative.

Q: What if I'm confronted with an ethical problem and I'm not sure what to think about it?

A: Ask yourself the following questions:

1. Does a specific action seem to be in compliance with the laws, rules, regulations, policies and procedures which guide our work?

2. How would the issue appear to your family, friends and the general public?
3. How would you feel explaining this matter to someone to justify the actions you've observed?
4. Do you feel it would be advisable to seek further clarification from someone with expertise in this area?

Q: What should I do if my supervisor is telling me to do something that is against the law or our MERIT Standards of Behavior?

A: First, speak with your supervisor and make sure you both understand the situation. Then try the next level of management. If your concerns are still not satisfied, see page 13 for options. You do not want to risk your job or the Hospital's future by doing anything that is illegal or unethical.

Q: I have reported my ethics questions to the Hotline and nothing has been done. What should I do?

A: That's a situation we hope never happens. We intend to respond quickly to all reports. There are several reasons a response could be delayed. You may want to speak directly with the Corporate Compliance Officer at 213-3523.

Q: Will I be informed of the results of the investigation?

A: Not always. Mission Hospital has an obligation to protect the rights of all employees. This includes both the person

reporting and the person reported. Some answers to questions are posted on the Intranet.

Q: I've heard of employees reporting their employer to the government when the employer fails to investigate and correct inappropriate conduct. Is this what's meant by the term "whistleblower"?

A: Yes, an employee can report an employer to federal authorities and this action is what the term "whistleblower" refers to. The federal False Claims Act does offer protection from employer retaliation should the employee report instances of fraud and abuse to government authorities. The purpose of Mission's Corporate Compliance Program; however, is not only to give employees a mechanism for reporting concerns, but also to ensure that concerns are investigated and corrected. Concerns can be directly reported to the Corporate Compliance Officer, also without fear of retaliation, at 213-3523.

Q: What if a patient or patient's family wants to contact the Integrity Hotline?

A: You want to first discuss their concerns with them and attempt to work through them right then. In most instances, that will resolve the problem. You may also want to speak with your supervisor. All patient complaints should go to Performance Improvement (213-9186). In some cases, Risk Management will be involved.

Q: Will my calls be traced?

A: Calls are not traced and no attempt is made to identify the source of the call.

Q: Am I asked to identify myself when I call?

A: You are not asked to identify yourself on the Hotline. You have the option to remain anonymous if you use the Hotline or call the Corporate Compliance Officer. You will be asked to give enough information about an issue so that it can be investigated quickly. You are not obligated to give your name. However, if you are willing to give your name, it will make it easier for the Corporate Compliance Officer to get all the information needed to investigate your concerns. All calls are treated confidentially.

Q: What should I do if I think someone is retaliating against me for reporting a violation?

A: Mission Hospital will not tolerate retaliation regarding reported violations that are made in good faith. Call the Corporate Compliance Officer to report any efforts to retaliate against you.

Q: What if you begin investigating my issue and you don't have enough information to bring it to a close?

A: This is a possibility, especially if those looking into the matter cannot call on you for further information. However that might mean, without enough information, that we cannot pursue the issue. All reports to the Corporate Compliance Officer Integrity Website and the Hotline are confidential.

Q: What should I do if I suspect my supervisor is doing something illegal or unethical?

A: Sometimes we unknowingly do something unethical so you might want to speak with your supervisor to be certain that you understand the facts of the situation. If something has already been done that is illegal or wrong, after talking it over, you and your supervisor should call the Corporate Compliance Officer to see that it is corrected.

CONTACT BY OUTSIDE AGENCIES

We are bound, both ethically and legally, to respond to governmental agency requests and to do it in a timely fashion. As soon as a request is received, it should be given priority and handled as necessary.

Q: If a government agent comes to me do I have to talk to them?

A: You may talk with them but you do not have to talk with them. You are entitled to have someone with you during any

interview with a government representative. Please see Administrative Policy "Contacts with External Agencies" for more information.

Q: If government agents come with a search warrant, what should I do?

A: Call your supervisor immediately and contact the Legal Department.

Q: What if the news media hears that we have had a visit from a government agency? What should I do then?

A: Refer the reporter to Marketing and Communications. They will handle it.

List Of Departments That May Need To Be Contacted

Business Customer Service	213-1500
Coding Questions	213-0642
Corporate Compliance Officer	213-3523
Discharge Planning	213-7814
Foundation	213-1020
Human Resources	213-5600
JCAHO Resource	213-9426
Legal Services	213-1250
Marketing & Communications	213-4800
Medical Staff Issues	213-6104
Performance Improvement	213-9186
Information Security Officer	213-0330
Risk Management	213-1250
Safety	213-0794
Toll free Integrity Hotline	1-877-ETHICS1
Pastoral Care	213-1090 or Beeper 257-9622

*For more information
about Mission Integrity
and its program elements,
go to the Mission Integrity
webpage on the
InsideMission intranet.*