

DOING THE RIGHT THING

(TUOMEY CODE OF CONDUCT)

Mission Statement

The mission of Tuomey Healthcare System is to promote good health and well-being and to provide excellent healthcare for everyone in Sumter and surrounding counties.

Vision Statement

To make it not only unnecessary, but unreasonable, for anyone to go elsewhere for a healthcare service that we can provide in a safe, high-quality and cost-effective manner.

Values

Tuomey Healthcare System employees will treat patients, other customers, and one another, as they would like to be treated. This is a continuous and challenging road we willingly and eagerly travel. One of the maps we use to guide us on this journey is the acronym "ICARE." It reminds us of the unending nature of our efforts and the values that define our thinking and behavior.

Integrity

Compassion

Accountability

Respect

Excellence

A Message from the President

To All Tuomey Staff and Affiliates

We have a comprehensive, values-based Corporate Integrity program, which is a vital part of the way we conduct ourselves at Tuomey Healthcare System. Because the program rests on our Mission, Vision, and Values, it has easily become incorporated into our daily activities and supports our tradition of caring – for our patients, our community, and our colleagues. We strive to deliver healthcare compassionately and to act with absolute integrity in the way we do our work and the way we live our lives.

This Code of Conduct, which reflects our tradition of caring, provides guidance to ensure our work is done in an ethical and legal manner. It emphasizes the shared common values and culture, which guide our actions. It also contains resources to help resolve any questions about appropriate conduct in the work place. Please review it thoroughly. Your adherence to its spirit, as well as its specific provisions, is absolutely critical to our future.

If you have questions regarding this Code, you should immediately consult your supervisor, another member of management, Human Resources, Administration, the Corporate Integrity Officer, or the Corporate Integrity Hotline (1-888-398-2633). You have an affirmative duty to report suspected violations of rules and regulations, federal and state laws, the Code, and Tuomey Healthcare System policies. You have my personal assurance there will be no retaliation for asking questions or raising concerns about the Code or for reporting possible improper conduct.

No Code of Conduct can substitute for each person's own internal sense of fairness, honesty, and integrity. Thus, in your daily life and work, if you encounter a situation or are considering a course of action that does not feel right, please discuss the situation with any of the individuals mentioned above.

We have a rich heritage, which is reflected in our Mission, Vision, and Values statements and in this Code of Conduct. We are equally committed to assuring our actions consistently reflect our words. In this spirit, we want this organization to be a community of shared values, and we expect all of our colleagues' actions to reflect the high standards set forth in this Code of Conduct. We ask you to assist us and all of our colleagues in this organization in supporting the values and principles that are critical to continuing our tradition of caring.

Jay Cox
President/CEO
Tuomey Healthcare System

Corporate Integrity Program

It is Tuomey Healthcare System's expectation that all affiliates including its Board, employees, physicians, consultants, contractors, vendors, and other agents adhere to standards set forth in the Code of Conduct. Tuomey's Corporate Integrity Program is intended to demonstrate in the clearest possible terms the absolute commitment of the organization to the highest standards of ethics and compliance. The elements of the program include setting standards (the Code of Conduct and Policies and Procedures), communicating the standards, providing a mechanism for reporting concerns, monitoring and auditing, and maintaining an organizational structure that supports the furtherance of the program.

The Corporate Integrity/Privacy Officer is responsible for coordinating the efforts of the Corporate Integrity program to include:

- Helping to resolve ethical issues within Tuomey Healthcare System.
- Helping individuals better understand policies and regulations
- Investigating reports or concerns related to ethics or policies

The Corporate Integrity/Privacy Office extension is 9500.

How to Report a Violation or Concern – you may express any concerns by contacting:

- Supervisor
- Manager
- Administrative Director
- Human Resources
- Administration
- Corporate Integrity Officer

Tuomey supports an environment in which employees feel free to report concerns without fear of retaliation or retribution. Any incident where retaliation or reprisal can be related to staff raising/reporting a problem will not be tolerated. Staff who commits or condones any form of retaliation will be subject to discipline.

Corporate Integrity Hotline

If you feel you cannot talk to your supervisor or anyone else in the healthcare system about your concerns, you may call the Corporate Integrity Hotline.

- The number to call is 1-888-398-2633.
- All calls are confidential and anonymous.
- Tuomey Healthcare System's policies prohibit retaliation against any caller who, in good faith, reports information to the Tuomey Corporate Integrity Hotline.
- Calls will not be recorded or traced. All information will be thoroughly investigated.
- Callers can receive information regarding the status of the investigation of their concerns.

Investigations of Reports

The Corporate Integrity Officer conducts a thorough investigation of every reported violation or concern. These investigations are handled in a confidential manner. The Corporate Integrity Officer coordinates any findings from these investigations and immediately recommends corrective action or changes that need to be made. Where an investigation substantiates a reported violation, it is the policy of the Tuomey Healthcare System to initiate corrective action, notifying the appropriate governmental agency if required, instituting whatever disciplinary action is necessary, and implementing systemic changes to prevent a similar violation from recurring in the future.

Leadership Responsibilities

While all Tuomey Healthcare System employees are obligated to follow our Code of Conduct, we expect our leaders to set the example. We expect everyone in the organization with supervisory responsibility to exercise that responsibility in a manner that is kind, sensitive, thoughtful, and respectful. We expect each leader to create an environment where all team members feel free to raise concerns and propose ideas. We also expect that they will ensure those on their team have sufficient information to comply with laws, regulations, and policies, as well as the resources to resolve ethical dilemmas. They must help to create a culture within THS, which promotes the highest standards of ethics and compliance. This culture must encourage everyone in the organization to share concerns when they arise. We must never sacrifice ethical and compliant behavior in the pursuit of business objectives.

Commitment to Our Customers

All employees, patients, guests, vendors, and members of the medical community are considered our customers. They are treated with respect, compassion, and dignity.

- We are committed to maintaining a high quality of care for our patients, as their comfort and wellbeing is our primary concern.
- We treat all people equally regardless of race, color, religion, sex, national origin, age, or handicap.
- We do not tolerate harassment, whether verbal or physical. Our goal is to provide a workplace free of tensions created by racial, ethnic, sexist, religious, or age-based remarks or animosity.
- We provide employees with a safe and healthy work environment.
- We do not work while under the influence of illegal substances, alcohol, controlled substances, or any substance that impairs job performance.
- We respect and understand a staff member's right to not participate in a procedure because of cultural values, ethics, or religious beliefs.
- We market and advertise our services in a truthful manner.
- We conduct ourselves in a professional manner at all times.

Patient Care Partnership

We treat all patients with warmth, respect, and dignity and provide care that is both necessary and appropriate.

- Patients have the right to high quality healthcare.
- Patients have the right to care that is delivered according to the highest safety standards.
- Patients have the right to a clean and safe environment.
- Patients have the right to be involved in their care.
- Patients have the right to privacy and can expect that their healthcare information will be used in a confidential manner.
- Patients have the right to be prepared for leaving the hospital, including information about followup care and additional resources as appropriate.
- Patients have the right to help with their bills and insurance claims.

Business Practices

- We conduct business in an honest and ethical manner and in full compliance with the law and our regulatory agencies.
- We do not ask for personal gifts and we decline gifts or benefits meant to, or which may appear to, influence us in the performance of our jobs.
- Hospital systems, facilities, equipment and other resources should not be used for personal benefit.

Business Relationships

- Federal and state laws and regulations govern the relationship between hospitals and physicians, who may refer patients to hospitals. The applicable federal laws include the Anti-Kickback Law, the Stark Law and the laws that govern tax-exempt organizations.
- We do not pay for referrals. We accept patient referrals and admissions based solely on the patient's medical needs and our ability to render the needed services.
- We do not accept payments for referrals we make. No Tuomey colleague or any other person acting on behalf of the organization is permitted to solicit or receive anything of value, directly or indirectly, in exchange for the referral of patients.
- Our arrangements and contracts with physicians or other healthcare professionals comply with applicable federal and state laws.

Financial Services

- We prepare and maintain accurate and complete billing records.
- We only bill for care and services provided and documented in the medical record as authorized and medically necessary.
- We answer billing questions honestly and courteously.
- Patients are responsible for co-payments and deductibles.
- We maintain billing records in a safe and secure place for the time required by law.

Accounting Practices

- We prepare and maintain accurate accounting records.
- We protect Tuomey Healthcare System's assets through effective internal controls.
- We prepare cost reports along with other state and federally mandated reports in compliance with all regulations.
- We maintain accounting records in a safe and secure place for the time required by law.

Conflict of Interest

- A conflict of interest exists any time a Board member or a member of our Administrative or Management team has a personal financial interest in a transaction with Tuomey.
- We require our Board members and each member of our Administrative and Management teams to disclose any potential conflicts.
- We strive to avoid even the appearance that our actions are not in the best interest of Tuomey.

Legal and Regulatory Compliance

Tuomey Healthcare System is subject to oversight by government and other agencies (e.g., DHEC, JCAHO, OSHA, OIG, CMS).

- We follow the guidelines set forth by these agencies and conduct business in a legal, ethical, and moral manner.
- When surveyed by regulatory agencies, we respond with openness and accurate information.

Emergency Treatment

We follow the Emergency Medical Treatment and Active Labor Act ("EMTALA") in providing an emergency medical screening examination and necessary stabilization to all patients, regardless of ability to pay.

Provided we have the capacity and capability, anyone with an emergency medical condition is treated.

- In an emergency situation or if the patient is in labor, we will not delay the medical screening and necessary stabilizing treatment in order to seek financial and demographic information.
- We do not admit, discharge, or transfer patients with emergency medical conditions based on their ability or inability to pay or any other discriminatory factor.
- Patients with emergency medical conditions are only transferred to another facility at the patient's request or if the patient's medical needs cannot be met at Tuomey Healthcare System and appropriate care is knowingly available at another facility. Patients are only transferred in strict compliance with state and federal EMTALA regulatory and statutory requirements.

Privacy Practices

Under federal law, health information is protected and confidential. Protected health information includes information about symptoms, test results, diagnosis, treatment, and related medical information. Health information also includes payment, billing, and insurance information.

- Health information is used for treatment, to obtain payment, and for health care operations, including administrative purposes and evaluation of the quality of care.
- All records are the property of Tuomey Healthcare System.
- Health information is discussed in an appropriate setting and not in public areas.
- Employees access the minimum health information necessary to perform their job duties.
- While all patients have the right to review their medical record, it will not be placed in their (or their family's) hands during the hospital stay unless the physician, physician's designee, or other qualified healthcare professional is present.

Safe Environment

Safety is the willful mental and physical process of preventing hazards that cause injuries to people and property.

- We provide a safe and healthy environment for all of our customers.
- We make sure equipment is in proper working condition.
- We report careless actions.
- We know the disaster codes and how to respond.
- We comply with OSHA, The Centers for Disease Control, Environmental Protection Agency, and other safe environment agency regulations.
- We dispose of all infectious and hazardous waste in accordance with federal and state laws and regulations.

Staff Acknowledgement

By electronically submitting that I have read this Code of Conduct for Tuomey Healthcare System, I acknowledge that I have had the opportunity to review it and understand what it means. I realize that any violation of this policy could result in disciplinary action, up to and including termination. Finally, I understand that I am an "employee-at-will" at Tuomey and this code shall not be considered to be an employment contract of any type.