

Regional Enterprises, Inc.
2019 Code of Conduct

- **Memorial Medical Center, Inc.**
- **Hayward Area Memorial Hospital/Water's Edge**
- **REI Medical Clinics, Inc.**



REGIONAL ENTERPRISES, INC.

1615 Maple Lane * Ashland, Wisconsin 54806 * Phone (715) 685-5510

January 2019

Dear Staff and Colleagues of MMC, HAMH, Water's Edge, REI and Tamarack;

From Board members to frontline staff, we have a long history of demonstrating sound and ethical practices both in the quality medical care we provide and the business we conduct on a daily basis.

In 2000, the Board sought to formalize this standard of practice through the adoption of a corporate compliance program. The attached document outlines the many aspects of this program.

It is important to note, this program is founded on integrity. It seeks to delineate the ethical business practices we expect from staff and ourselves. Finally, it seeks to clearly outline the processes you can use to identify and report any breach of this commitment.

The Board and Administration are dedicated to insuring that all business deadlines occur in an appropriate and ethical manner. By doing so, we can insure we will always comply with the myriad of rules and regulations that regulate all healthcare organizations.

The continued success of this program relies on you. However, I have confidence you will have no problem achieving these standards and that these sound business practices will undoubtedly serve you well throughout your career and life.

Jason T. Douglas
President

REGIONAL ENTERPRISES INCORPORATED

To include: Memorial Medical Center, Hayward Area Memorial Hospital/Water's Edge Care Centers

CODE OF CONDUCT

Regional Enterprises Incorporated (REI) is the parent corporation of Memorial Medical Center Incorporated, Medical Services Incorporated d/b/a Hayward Area Memorial Hospital and Waters Edge. Currently REI provides services to these facilities in several different areas.

The missions for these facilities are similar in that we strive to improve the health and wellness for people of our south shore region of Lake Superior and that of the Hayward area.

Our visions are that we want to be vital partners for healthy lives and we envision ourselves as coordinators of care for the residents of the area and visitors to the area along with being a premier provider of residential and healthcare services for the senior members of our community.

Regional Enterprises Incorporated is committed to complying with all laws and regulations that govern our activities.

The standards discussed in this Code of Conduct apply to all of the facilities' workforce members, including Board members, hospital leaders, employees, medical staff members, credentialed practitioners, contracted services, students, volunteers and other agents who work at or for our facilities.

This document provides a brief overview of certain behavioral and policy matters for REI and its affiliated entities. It is not intended to serve as a source of official company policy, nor is it to replace any company manuals. Employees are expected to review such administrative or policy manuals for detailed information regarding company policies and procedures.

We provide training to supplement employee's knowledge of laws and regulations applicable to their duties to avoid violations, including those that may be inadvertent. In addition, we investigate and remedy any breach of law or regulations as promptly as possible. It is your duty as an employee to report instances of possible violation with the assurance that confidentiality will be protected within the full limits of the law.

It is important to understand that any violation of these standards, or any laws or regulations, by action or inaction, is beyond the scope of employment. Such violations may subject an employee to disciplinary action.

Mechanisms for Addressing Issues and Concerns:

Within the organization there are complex, ever-changing rules and regulations that govern each particular type of service. We recognize that this can create areas of uncertainty for employees who carry out daily operations. Questions and concerns about the correct way to handle different situations may, and often do, arise. We encourage employees to use the following steps to find the answers they need.

1. If you have a question about an issue or have a concern, ask, and keep asking until you receive an answer you are satisfied with, and makes sense. Think about, is the action legal and is it consistent with policies and procedures, and values and principles? Always remember, if it is wrong or appears wrong, question it.
2. Follow the reporting process. It is better to raise a question than to take action that is improper. It is the organization's policy to ensure that no employee is penalized for reporting an issue or concern in good faith. Please refer to the non-retaliation policy. Discuss issue with your immediate supervisor. If you are uncomfortable or not satisfied, discuss with a higher level manager. If you are uncomfortable or not satisfied with this, discuss with another company resource, such as but not limited to, the compliance officer, human resources, or administration.
3. Call REI's confidential compliance hotline number. The hotline number is **1-866-680-7960**.

STANDARDS

Fair Treatment of Employees-

It is the responsibility of staff of REI and affiliated hospitals to create and maintain a work environment in which employees are treated with respect, dignity, fairness, and equal opportunity. Harassment or abuse of any kind is prohibited in the workplace. Discrimination on the basis of race, religion, color, sex, gender identity, age, disability status, national origin, veteran status, marital status, sexual orientation, arrest or conviction record or any other illegal basis is strictly prohibited in any work-related decision.

If an employee perceives that inequitable or unfair conduct is occurring in the workplace, the employee should utilize his or her company's grievance or problem resolution processes available within the organization. If the employee is uncomfortable or not satisfied with this process he/she may contact Human Resources or use REI's confidential compliance hotline. **(1-866-680-7960)**

Patient Care-

Patient care must be appropriate and designed to meet the intended outcomes of the patient's treatment plan. Patients must be treated with sensitivity, respect, and professionalism, free from harassment, abuse and neglect.

We will continue to seek new approaches to increase the quality of care delivered to our patients while ensuring that care is delivered in a cost-effective manner.

We will observe all applicable standards of professional practice in our facilities and programs.

Ethical Business Practices-

We will display good judgment and high ethical standards in business decision making. We will conduct business with honesty, fairness, and integrity. These qualities are demonstrated through truthfulness, the

absence of fraud and abuse, and respect for the laws applicable to our business. It is the responsibility of every employee to act with integrity.

Billing Practices-

We will ensure that bills are accurate and honest at all times. We will bill only for services actually rendered. Services rendered must be accurately and completely coded to ensure proper billing. Billing must comply with the requirements of State and Federal payors and conform to all payor contracts and agreements.

Substantiating medical documentation must be provided for all services rendered. Periodic internal audits will be conducted to support documentation and billing. Medical records may be amended to correct an error or complete documentation only in accordance with established medical record procedures, not for the purpose of covering up errors or obtaining any payment to which we are not entitled. Medical records may not be erased or altered.

Billing data must be retained for periods described by law and by policies that may require a longer period of retention in some cases. Billing policies and procedures must be written, approved by management, and appropriately updated. These policies and procedures must be available to all employees involved in the creation of charge or billing data.

We provide financial assistance to qualifying patients consistent with federal regulations.

When payor agreements require the collection of co-payments and/or deductible amounts, these amounts will be collected to the full extent of the agreement. Decisions to waive any co-payment or deductible must be disclosed and implemented in accordance with written organizational policy. Employees who suspect that improper billing or documentation is occurring should immediately bring to the attention of their supervisor or a higher level manager. If the issue remains a concern the employee may call the confidential compliance hotline. **(1-866-680-7960)**

Additionally, anyone who suspects or would like to report potential fraud and abuse, can call or write to the local Medicare contractor, or contact the Office of Inspector General (OIG) National Hotline directly at: 1-800-HHS-TIPS. Reports may be used during an investigation, but they are held in the strictest confidence. Reports can also be made anonymously.

Accuracy of Records-

We will prepare and maintain all patient and company records accurately and retain such records for periods prescribed by law and organizational policy. We will destroy or dispose of records and confidential information according to government regulations and company policies.

Ensure that all patient and business records for which you are responsible are accurate and complete.

Patient records must conform to acceptable standards for the maintenance of such records and shall not contain any false or misleading information.

Organization's financial records and other records shall not contain any false or misleading information. Financial transactions will be recorded according to generally accepted accounting principles.

Confidentiality of Information-

Staff and affiliates will adhere to all Health Insurance Portability and Accountability Act (HIPAA) standards and regulations. Violations of the facility's HIPAA policies and procedures may result in disciplinary action up to and including termination. Violations of HIPAA law could also result in civil and/or criminal penalties.

Protect confidential and proprietary information, including patient information.

Never disclose confidential information to any unauthorized person or organization.

Information obtained, developed, or produced by the organization and its employees, information supplied by outside consultants or vendors for the benefit of the organization, and information about employees is confidential. This information should not be disclosed to anyone outside the organization, including family, friends, relatives, business or social acquaintances, customers, suppliers, or others, unless you have specific authorization. Do not disclose this information to other employees except on a “need to know” basis and with the agreement of the recipient to treat the information as confidential. Employees may refer to confidentiality policies maintained at each facility.

Marketing-

We will advertise to inform the community of the availability and value of our services, to provide educational information about personal health, and to inform the public of our views on public policy issues related to health care.

Advertising should be honest and accurate and, when presenting views on issues, clearly distinguish opinion from factual data.

Conflicts of Interest-

Avoid conflicts of interest and the appearance of conflicts of interest. Employees involved in decision making where a conflict of interest exists, should excuse themselves from the decision making process.

A conflict of interest occurs if an outside interest or activity may influence or appear to influence your ability to exercise objectivity or meet your job responsibilities. Participation in activities that conflict with your employment responsibilities is not acceptable.

Improper Use of Funds-

Any payment that may be viewed as a bribe, kickback, or inducement is strictly prohibited. A “bribe” or “kickback” is any payment or consideration of value offered with intent to influence a decision on the grounds not directly related to business merits. Payments or considerations of value given to physicians or other parties to influence

the flow of referrals are inducements and are strictly prohibited. We will conduct all business and financial relationships in a manner consistent with the law.

Employees who have knowledge of improper use of funds should report it to their supervisor, administration or the confidential compliance hotline. **(1-866-680-7960)**

Health, Safety and Environmental Concerns-

It is our policy to comply with all applicable workplace health, safety, and environmental laws and regulations. Employees come in contact with or handle hazardous chemicals, infectious agents, medical waste, and low-level radioactive materials at various locations. All employees are expected to handle these materials according to established control, storage, and disposal policies and procedures. If you do not know the correct procedure for handling or disposal of a material, promptly ask your supervisor or another resource, such as the health, safety, and risk officer.

Protecting Company Assets-

Company property is made available to employees for authorized business purposes and should not be used for personal reasons. This applies to physical assets such as office equipment, computers, software and supplies, as well as other types of property such as company records and patient information. Company property must not be removed from company facilities unless it is necessary to do so to perform your job. If removed from company facilities, you must return the property to the facility when it is no longer needed off-site for company related purposes.

All employees are expected to maintain and properly care for company property.

Condition of Employment-

Adherence to the provisions of REI's compliance program and standards of the code of conduct is very important. Accordingly,

adherence to the standards in the code of conduct is considered a condition of continued employment.

Department Heads, Directors, and Supervisors-

Because of their level of responsibility and involvement with operations, department heads, directors, and supervisors serve as the front line for ensuring corporate compliance. Accordingly each department head, director, and supervisor is expected to be familiar with the code of conduct, help ensure that new employees in compliance-sensitive positions receive appropriate training on compliance issues, and include in each employee annual evaluation a discussion of compliance matters.

Independent Contractors-

Independent contractors providing services to REI and affiliates, particularly in areas where failure to adhere to pertinent laws and regulations could create legal exposure for REI, will be expected to adhere to these standards in the code of conduct.

Discipline/Response to Offenses-

Disciplinary action may be taken in the event that an intentional violation of law, regulation, or REI standard of code of conduct is identified. The Human Resource department will determine the specific discipline, based on the seriousness of the issue, which may include a warning, suspension without pay, or dismissal. Disciplinary policies and procedures are maintained at each facility and will be adhered too accordingly. If the action involves violation of law, the compliance officer may consult with legal counsel as to whether the matters must be reported to government authorities.

Government Investigations-

REI and its representatives will cooperate fully in any audits or investigations by government agencies and authorities.

In the event of a contact by a government auditor or investigator, you are requested to contact the corporate compliance officer immediately at

(715) 685-5185, internally at extension 5185, or to the facility's Administration office and to:

- Treat the investigator with respect
- Ask for identification or credentials
- If the investigator has requested documents, ask for a copy of the legal document authorizing such request and provide the requested information
- Do not interfere with a search
- Request permission to monitor the search and take notes regarding areas searched, documents seized, and questions asked by the investigators
- Obtain a receipt for any items seized
- Do not remove, destroy, or modify any documents
- Do not make any false statements
- Employees have the right not to be interviewed by government authorities. It is the employee's choice whether or not he or she agrees to be interviewed. If you do agree to be interviewed, you may also wait to answer questions until an attorney is present.

Conclusion

This Code of Conduct is a tool designed to communicate standards that apply to patient care and business activities at our facilities. The Code is intended to assure that workforce members understand the standards and help our facilities meet our compliance obligations. It is intended to help create and support a culture where, when problems do arise, they are identified quickly and resolved. Every workforce member has an important role to play in order for our compliance program to be effective and successful.

Signature Page

I have received and read the 2019 REI Code of Conduct. I understand the contents of the information contained in this booklet and understand that if I have questions that I may contact the REI Compliance Officer or Administration for any questions I might have:

REI Compliance Officer:
Phone Number: (715) 685-5185

Administration:
MMC (715) 685-5510
HAMH/WE (715) 934-4247

Printed Name

Signature

Title

Date

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