

COVENANT HEALTHCARE CORPORATE COMPLIANCE PROGRAM

Covenant HealthCare's Corporate Compliance Program has been implemented to assist in maintaining and promoting the integrity and ethics of our organization, providing guidance for:

- Creating a culture that promotes the highest standards of ethics and compliance.
- Complying with federal, state, and insurance regulations.
- Completing our work according to written policies.

Our “**Code of Conduct**” and supporting compliance policies serve as a guide on maintaining an effective compliance program. Expectations identified in the Code of Conduct that would be beneficial for colleagues to understand include:

- **Obligation to Report**
 - Employees have an obligation to report possible compliance violations or unethical situations.
- **Acceptance of gifts**
 - Gifts to or from vendors, physicians, or patients, that may suggest/create an obligation to do business with them or that may potentially influence a decision are not allowed.
 - Gifts of cash or cash equivalents (gift certificates) from vendors, patients, physicians, or anyone we do business with, are not allowed.
 - Gifts that generally are acceptable would include those that are perishable (food or flowers) that are shared within the department.
- **Confidentiality**
 - Information regarding patients may only be shared with colleagues who have a legitimate business need for such information.
- **Taxation issues**
 - Purchasing a product through Covenant to avoid paying taxes or getting a better price is prohibited.
 - Using products or equipment that belong to Covenant for our own personal benefit is not allowed.
- **Federal Laws & Regulations that Apply to Health Care**
 - **Anti-Kickback Statute** - Offering or receiving anything of value that may influence a patient's decision to use services from Covenant is a violation of this regulation.
 - **Deficit Reduction Act** – Requires hospitals to provide policies and education related to fraud, abuse or waste of Medicare/Medicaid benefits and the Federal and State whistleblower protections.
 - **EMTALA** – Patients presenting with an emergency medical condition will be provided stabilizing treatment or an appropriate transfer regardless of ability to pay.
 - **False Claims Act** - Knowingly submitting a claim for a more complicated and costly service than the service that was actually provided is a violation of this regulation.
 - **HIPAA** - Information regarding patients may only be shared with colleagues who have a legitimate business need for such information.
 - **Stark** – Impacts business relationships between physicians and the hospital.

Resources for Compliance Information:

- As a colleague of Covenant HealthCare, we would like to offer our assistance if you would like compliance education for you or your staff. For more information, contact:
 - Jim Foresman, Corporate Compliance Officer 989.583.4580
 - Michele McDonald, Compliance Administrator 989.583.4582