COMPLIANCE PROGRAM & CODE OF CONDUCT

A System of Employee Empowerment & Accountability

CENTRA

CENTRA ALLIANCE

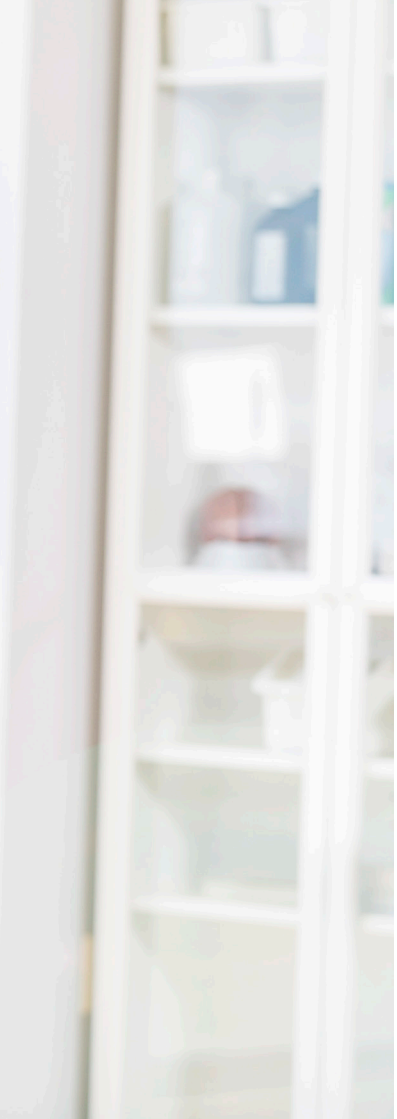
Archetype HEALTH

CENTRA

Centra Specialty Hospital

HealthWorks

PIEDMONT COMMUNITY HEALTH PLAN



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Message from the Centra Board of Directors and President/CEO

Message from the Centra Board of Directors and President/CEO

Dear Caregiver,

We have proudly served this community for more than three decades. As an organization, we are committed to honest and ethical behavior, conducting our business with integrity, and behaving in ways that embody our values. Our Code of Conduct is the keystone of our corporate integrity and communicates our business standards. Our Code of Conduct serves as a cultural compass for anyone who interacts with Centra and is an essential element of our Compliance program.

We believe each Caregiver that comprises the Centra team contributes to value, and each member's support helps to assure that our system provides quality services and a safe environment for our colleagues. It is our sincere hope you use this booklet as a valuable resource in how each of us are to carry out our organizational mission and guides the work we do each day.

Here at Centra, we are committed to being a great place to work and a great place to receive care. Working together on compliance is the key to that success.

Richard Tugman
Interim President and CEO

Thomas Nygaard, MD
Board Chair

Compliance Program

Compliance Program

Centra is bound to the highest standards and ethics in all of its efforts. The Code of Conduct and Business Ethics ("Code") tells us what we must do (compliance) and what we should do (ethics). It provides values that govern how we conduct business. It provides a clear sense of the business, professional and personal ethics that are required of us all. **We must all:**

- Read the Code and know how it applies to us
- Ask questions and report issues
- Complete yearly training
- Certify our duty to the Code

The Compliance Office is here to help us meet those standards and ethics in all that we do.

Keys to Compliance and Ethics

Keys to Compliance and Ethics

- Respect for others—treat with fairness, respect and worth
- Quality of care—provide the right medical services that are safe and in compliance with laws, rules and standards without asking for or taking anything of value for referrals
- Safeguarding Centra's assets—assets should only be used for valid business reasons as planned and approved and may not be used for our own benefit or gain
- Safeguarding Centra-owned and private info—all info having to do with the dealings and business affairs of Centra, our patients and business partners must be kept private to the greatest extent we can
- Conflicts of interest—report any likely conflicts of interest

Our Workplace

Respect for Others

We are a team. Our success depends on our ability to inspire trust with each other and patients. We ensure a work setting that supports our just cause, values and policies. We do not excuse rude conduct by or toward anyone. That includes each other, patients, visitors and vendors.

WE RESPECT ONE ANOTHER

We do not allow bullying, threatening, or harassing conduct, such as:

- Hurtful jokes or slurs
- Sexual harassment
- Workplace violence or threat of violence
- Having firearms or other weapons (except as allowed for security reasons or in the lawful control of police) on Centra grounds

Workplace Health & Safety

Centra protects the workplace and the health and safety of everyone through compliance with health and safety laws and rules. We must practice safety awareness. Think in a way that protects against harm and anticipates unsafe conditions.

This means we:

- Complete required safety training
- Comply with all laws, rules, accreditation standards and Occupational Safety and Health Act requirements
- Report accidents, injuries, unsafe equipment and conditions right away so that action can be taken quickly
- Know our job fully and follow safety policies that apply to our job duties
- If unsure of the safe way to do things, do not guess. Ask a manager

Alcohol and Drug Use

Centra maintains a smoke-free, drug-free workplace

- We report for work free of the effect of alcohol or illegal drugs
- Notify our manager if we believe an over-the-counter and/or a prescribed drug may impair our judgment or ability to do our job
- Talk to our manager at once if we notice someone who appears to be impaired
- **Smoking on Centra grounds is not allowed**
- **Sale or use of alcohol or other drugs in the workplace is not allowed**

Background Checks

We hire and do business with qualified people and businesses. Centra screens all caregivers and vendors to make sure that they are not barred from doing business with government funded health care programs (i.e., Medicare). At the time of hire, and from time to time after that, Centra runs certain background checks to make sure that we follow state and federal laws.

This means we do not hire, keep employed, contract with or bill for work done by a person or business that:

- Has been convicted of a crime related to health care
- Has been convicted of a crime that bars the person from working at Centra
- Is barred from doing business with government funded health care programs

We all must Alert Human Resources (HR) of all criminal convictions and pending charges
Failure to tell HR of all such info may result in firing from Centra

Reporting

You may ask questions about filing a report or raise concerns with:

- A manager
- The Compliance office
- The Medical Staff office
- The HR office
- The CEO/President

- If you wish to report a suspected violation of this Code you may call the Compliance Hotline at 800.713.4703, visit Centrahealth.ethicspoint.com or scan this QR code with your mobile device. You may provide your name or remain anonymous.

The Hotline is staffed by an independent third party and calls are not traced or taped. We do our best to protect your identity within the limits of the law.

When we report a concern in good faith we are safe from retaliation. “Good faith” does not mean that we have to be correct about what we report, but it does mean that we must be telling the truth as we know it.

Our Health System

Quality of Care

Centra provides quality care to all patients. We make sure that patients get the right services to meet their needs.

- Treat our patients with dignity. Respect their right to privacy. Respond to their needs promptly and politely
- Accept patients without regard of their age, physical or mental disability, ethnicity, culture, language, socioeconomic status, race, color, creed, religion, national origin, sex, sexual orinentation, or gender identity or expression
- Provide emergency care without regard for patients' ability to pay or source of payment
- Only refer a patient to another facility when we believe that they will provide the care that meets the patient's needs
- Make sure that those who have proper credentials and who have proven competency provide care for our patients
- Maintain patient records that are complete and true accounts of all care rendered
- Respect a patient's right to make his or her own health care decisions after being informed
- Provide services that are right, safe and comply with all laws, regulations and standards

We help patients know and exert their rights:

- Right to privacy and confidentiality
- Right to be free from discrimination
- Right to equal access to health care (i.e., use of interpreter services, auxiliary aids and services, use of service animals)
- Right to make informed health care decisions and advance directives
- Right to file a grievance

Protecting patient rights is not only the law, it is the right thing to do because it:

- Improves access to care
- Improves quality of care, health results and health status
- Improves patient satisfaction
- Improves use of health care resources
- Prevents health gaps among groups with special needs

Equal Access to Healthcare

We comply with the Emergency Medical Treatment and Active Labor Act (EMTALA) to ensure equal access to healthcare:

- We provide a medical screening exam and (if needed) treatment to stabilize all patients who come to the hospital for emergency care, whether they can pay or not
- In an emergency or if the patient is in labor, we do not delay medical screening and stabilizing treatment to seek financial and demographic info
- We do not admit or discharge patients with emergency medical conditions based on whether or not they can pay or any other discriminatory factor
- We only transfer patients with emergency medical conditions to another facility, in compliance with state and federal requirements, and Centra policies

We provide qualified interpreters and other auxiliary aids and services to patients and their companions.

We ensure compliance with patient rights to use service animals. A service animal is defined as a dog that is trained to do work or perform tasks for the benefit of a person with a disability. That includes people with physical, sensory, psychiatric, intellectual or other mental disability.

Examples of types of tasks that service animals do:

- Help during seizure
- Get medicine or other items
- Assist with balance and support
- Provide passive safety or rescue work

There are only two questions that CAN be asked about a service dog or miniature horse:

- Is this a service dog or miniature horse required because of a disability?
- What work or tasks is the dog or miniature horse trained to perform?

Questions that CANNOT be asked about service dogs or miniature horses:

- Cannot ask about the disability
- Cannot request proof of formal training or certification
- Cannot ask for more payment
- Cannot keep service dogs or miniature horses from most healthcare settings, except for secured areas (operating rooms, labor and delivery rooms, hemodialysis, coronary care, and intensive care units and areas named as infectious care or isolation areas).

Accurate Books and Records

Centra's books, business and medical records, reports and accounts must truly reflect the business dealings and assets of Centra. You must not create or join in making records that mislead or hide bad conduct. **No one may:**

- Make a false or misleading report
- Be dishonest in recording business transactions or maintaining records

Centra's records must be complete and true in all respects. They must be kept in compliance with health care practice standards and requirements of any authority that governs Centra.

All billing policies, medical records, protocols and instructions comply with payment requirements under Medicare, Medicaid and other applicable payment programs. We store records in a safe and secure place and manage them so that we can retrieve them quickly.

Accurate Books and Records

Centra's records retention policies govern how long records should be kept. A record is any info that has been made or received as part of Centra's business.

- We must comply with all records retention policies and preservation notices
- Records must be kept for the proper duration
- Records that pertain to litigation or a governmental or internal investigation may not be destroyed until the matter has been resolved and the Compliance Office has approved

Destroying or changing documents with the intent to block a pending or expected official government proceeding is a criminal act. Doing so could result in large fines and jail time.

Centra Assets

All Centra assets should be used only for business reasons. They may not be used for our own benefit. We must protect Centra assets against theft and misuse.

- We follow approved procedures in handling, recording and disposing of all Centra assets
- No assets may be used and no info may be disclosed for a non-Centra purpose without the ok of leadership or unless required or ordered by law

Computer and Information Systems

We must properly use all computer and info systems.

- Equipment may be used only for business reasons. Minimal personal use is allowed
- We should not expect a right to privacy in our email or internet use. Centra may monitor all equipment and network use

- **We should follow Centra's security policies by:**
    - Using password guidelines and keeping passwords private
    - Encrypting and securing mobile devices that contain confidential or patient info
    - Logging off or locking computers when not in use
    - Securely emailing confidential or patient info
    - Reporting any concerns right away to Centra's Security and/or Privacy Officers

- We are not allowed to access websites that contain sexually explicit, illegal or discriminatory content
- Personal use of equipment and systems may be subject to access and usage limits
- No one may access or try to access someone else's or Centra's electronic communications (such as email) without proper approval
- We do not violate copyright laws or licensing agreements

Safeguarding Physical and Intellectual Property

Centra respects intellectual property and resources of Caregivers, patients, vendors, business partners, and competitors.

We keep confidential any info about strategy and operations that includes:

- Personnel files
- Patient lists and clinical info
- Passwords
- Pricing and cost data (except as required to disclose by law)
- Info that belongs to acquisitions, sales, affiliations and mergers
- Financial data
- Research data
- Strategic plans
- Marketing strategies
- Supplier and subcontractor info
- Centra owned computer software

The Marketplace

Conflicts of Interest

- We make all job related choices based on what is best for Centra
- We owe a duty of loyalty to Centra in all activities that affect Centra
- We must disclose any real or perceived conflicts of interest so that they can be managed

A "conflict of interest" exists, for instance, when:

- We use our role at Centra for our own gain
- We help others profit to the loss of Centra
- Our outside interests skew our objectivity
- Outside activities interfere with our duties to Centra

While it is not possible to describe every case, here are types of likely conflicts of interest:

1. Financial Interests

- Deals that involve a personal or family financial interest that may affect Centra
- Financial interest in any business with which Centra conducts business

2. Employment, Memberships and Business Relationships

- Working with a company that has or is seeking business with Centra
- Serving on the board of directors of a competing company without prior consent from leadership
- Having a Caregiver report to a family member

Corporate Opportunities

We all have a duty to advance Centra's lawful business rights. We are not allowed to use Centra assets, info or roles for our own gain. We are not allowed to compete with Centra.

You may speak on a topic linked to your role at Centra or Centra's business, so long as you get consent from your manager:

- We may accept modest travel, lodging and meals, or repayment for such costs
- We may not accept a speaking fee when doing Centra business

Procurement Integrity

Centra conducts business fairly and free from conflicts of interest. **This means we:**

- Hold ourselves to the highest ethical standards in all purchasing activities, to include, selection, negotiation, and contract awards
- Comply with contracts
- Require vendors to comply with our Vendor Compliance Addendum and Business Associate Agreement

Centra Owned and Confidential Info

All info about business affairs at Centra, our patients and partners must be kept private to the greatest extent that we can.

Belongs to Centra and Others

Confidential info includes all non-public info that might be of use to competitors or that may be harmful to Centra or its patients if disclosed.

- We should get prior consent before sharing such info with others
- We should check with a manager to make sure contracts are in place prior to sharing

Patient Information

We must respect and keep private all patient info. We are all required to follow the rules of the Health Insurance Portability and Accountability Act (HIPAA) and any state laws about the privacy of patient info. We only use, disclose or discuss patient info if we have a real business purpose. We also make sure that the person getting the info is approved to do so.

It is proper to disclose the minimum necessary portions of a patient's record for treatment, payment or healthcare operations.

- Ok to disclose to an individual who is providing treatment to the patient
- Ok to disclose to the patient's insurance in order to receive payment
- Ok to disclose to a peer review committee for actions that benefit healthcare operations
- **We do not post patient information on social media sites**

Gifts and Entertainment

We are not allowed to ask for or take anything of value that is or could be seen as a bribe. That includes money, gifts, loans, rewards or favors.

Acceptance of Gifts

We are allowed to accept gifts from patients/families (no cash or items that are the same as cash such as gift cards) so long as:"

- They are of "nominal" value (less than $75)
- Shared within the office (i.e., food or flowers)

We should politely decline gifts that are greater than nominal value. We should tell the person that they are welcome to make donations through the Centra Foundation. If you receive a gift that is meant to sway a business decision, you should politely decline. You should report it to a manager or Compliance.

Per Centra's Vendor policy we are not allowed to accept gifts from vendors: food, meals, promotional products, or entertainment.

Offering of Gifts

Centra's business involves working with federal, state and local officials and employees. They have strict rules about business gifts.

- We do not offer or give anything of value except for modest food/drink or business-related meals during business activities
- We do not offer or provide entertainment

Bribes, Kickbacks, Antitrust Laws and Billing/False Claims Act

Centra complies with all federal and state anti-kickback laws and regulations.

- We do not offer, give, ask for or receive money, gifts, loans, rewards, favors, business opportunities or anything of value that creates or could be seen as creating a bribe or kickback
- We do not ask for or take anything of value in exchange for the referral of patients
- We do not provide "professional courtesy" discounts

Centra complies with all antitrust laws and regulations. We do not enter into any talks or contracts with a competitor about:

- Which providers Centra will contract with and any terms of those contracts
- Which health plan offerings or other products or services Centra will accept
- Pricing, to include info on wages and benefits
- Dividing or trying to divide territories or customer lists

Centra prevents health care fraud and abuse by complying with the False Claims Act and making sure that we do not:

- Bill for work performed that we know was not done
- Fake records
- Double bill for items or work performed
- Submit bills for work that was never performed or items that were never given
- Make a claim for work or products at an inflated price
- Bill for work that was not ordered by a physician
- Fail to report overpayments or credit balances within 60 days after finding out
- Bill for poor quality work that the government would not pay for

We fully assist with government inquiries.

- We assist with and are polite to all inspectors. We provide all info that they are entitled to during an inspection

Upon learning of a government inquiry, we:

- Notify our manager at once. That report is then promptly disclosed to the proper leaders, Legal and Compliance
- Are always truthful in response to questions and do not conceal, destroy or alter any records

Tax (Nonprofit activities)

Centra is a nonprofit tax exempt business. As such, we may only pursue activities that further our charitable purpose.

- Failure to do so could risk our tax exempt status

Political contributions and activities

Centra supports involvement in civic affairs and the political process as long as you are not speaking or acting on Centra's behalf. You may join in such activities on your own time and at your own expense.

- We may not use Centra's resources (e.g., money, work time, supplies) to benefit campaigns
- We may not seek refunds from Centra for any personal donations to campaigns

Questions

Questions

Please contact Compliance at **Compliance@centrahealth.com**
or by calling **434.200.4605.**

Hotline Reports: **800.713.4703, Centrahealth.ethicspont.com, or QR Code**
Can contact **24 hours a day, 7 days a week**

Acknowledgement

We are all required to certify that we have:

- Read this Code
- Agree to follow its standards
- Agree to follow Centra policies and procedures

Updates to the Code

From time to time, Centra may amend this Code. Waivers of this Code may be granted only by the Compliance Office.