

ROGERS MEMORIAL HOSPITAL

CORPORATE
COMPLIANCE
HANDBOOK



August 2012

Introduction

Rogers Memorial Hospital is dedicated to conducting business honestly and ethically. In order to live up to this commitment, Rogers Memorial Hospital has set forth below the principles and rules to be followed by all staff members and other individuals who work with Rogers Memorial Hospital. This Handbook will serve to familiarize new staff with the ethical standards that guide our business and patient relationships. For existing staff, it will reaffirm our commitment to ethical standards that guide our business and patient relationships. For existing staff, it will reaffirm our commitment to ethical behavior in all that we do. Conduct in violation of these principles and rules are beyond the scope of any of our jobs and may lead to serious sanctions, including terminations.

What is included here cannot, nor was it intended to, cover every situation you may encounter. When the best course of action is unclear, we urge you to seek the guidance of your supervisors or a member of the Corporate Compliance Committee. We have designated Rogers Memorial Hospital Corporate Compliance Officer to administer the Compliance Program outlined in this Handbook.

Remember – no illegal or unethical conduct is in Rogers Memorial Hospital’s interest or yours.

Patrick T. Hammer
President & CEO

Our Mission

We exist to offer exemplary behavioral health care services including treatment, research, education and training, in continuation of our century tradition.

We are dedicated to a skilled, professional, team approach of individualized care within a treatment community, respecting the dignity of each person.

Our success is demonstrated in premier quality care, successful outcome, financial integrity, personal and organizational growth, and community well being.

Our Values & Vision

- ◆ We will be recognized by our customers, patients, clients, and staff as the industry model – one that is continually striving to be the standard for excellence.
- ◆ We are dedicated to educating the public to the value of identifying and treating behavioral illnesses and their impact on people's lives.
- ◆ We are dedicated to investing our resources in innovative solutions so that our customized health care and support services remain accessible, compassionate, cost-effective, and high quality.
- ◆ We strive to provide our staff with a nurturing environment to empower them to achieve their highest quality.
- ◆ We approach all aspects of our business with a high level of integrity and responsiveness.
- ◆ We are community-minded supporting our local businesses with resources, and our communities with care.

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GETTING ANSWERS TO ETHICS AND COMPLIANCE QUESTIONS

Open discussion of ethical and legal issues without fear of retribution is the cornerstone of Rogers Memorial Hospital's Compliance Program. Rogers Memorial Hospital will not tolerate retaliation against any staff member who, in good faith, reports an ethical or legal concern. If you have a questions about a legal or ethical issue related to your job, you should take advantage of the following Rogers Memorial Hospital resources:

List of Phone Numbers

Compliance Helpline	(262) 646-1301
VP of Nursing	(262) 646-1397
Marketing Department	(262) 646-1310

If you have any question about legal or ethical issues that arise in the everyday performance of your job:

- ◆ Discuss the issue with your Supervisor; or
 - ◆ Speak to your Department Manager; or
 - ◆ Speak to a member of the Ethics Committee
 - ◆ Speak to the local Human Resources representative or COO; or
 - ◆ Contact the Compliance Helpline at (262) 646-1301 or
- Use any combination of the resources outlined above.

ETHICAL RESPONSIBILITIES OF ALL ROGERS MEMORIAL HOSPITAL STAFF

Every Staff Member's Responsibility: ETHICAL PERFORMANCE

The Governing Board of *Rogers Memorial Hospital* has established this statement of organizational ethics in recognition of the hospital's responsibility to its patients, staff, physicians, and the community to act in a manner that is consistent with the following principles:

We will encourage a spirit of service to the community at large by seeking and supporting ways that patients who do not have resources for care can be offered options for care either here or in the community

We will assure competent care and competent staff in order to seek a climate of quality care. We will provide services to meet the identified needs of our patients and will strive to avoid those which are unnecessary.

We will communicate truthful and accurate information in the patient care setting, in the medical record, and in our billing practices as well as continually maintain patient and staff confidentiality.

We will be mindful that we are charged with dual obligations to work for the best interest of our patients while being prudent stewards in regard to the resources of the hospital. We shall, through accurate and cost-effective health care practices, seek to work toward the interests of our patients, our organization, and the health care community.

As a Hospital we shall provide care which is directed toward meeting the patients welfare first while striving to do no harm.

We will provide a forum for the multidisciplinary staff, patients, family and referents through the ethics referral process to consider ethical issues.

All patients, employees, medical staff and visitors shall be treated with dignity, respect, and courtesy. Reasonable accommodation shall be given for physical, emotional, social, spiritual, cultural, and intellectual needs of patients, employees and guests

As a member of the staff of Rogers Memorial Hospital, you have an obligation to be honest in all your dealings with clients, patients, vendors and third parties. You must know and comply with applicable laws and all Hospital policies and procedures. Claims of ignorance, good intentions, or using poor judgement will not be accepted as an excuse for noncompliance. Maintaining ethical standards is everyone's responsibility. If you know of a problem, you cannot remain silent. You must step forward to solve it!

Rogers Memorial Hospital Manager's Responsibility: ETHICAL LEADERSHIP

Leadership requires setting a personal example for high ethical standards in the performance of your job. It is up to you, as management, to set the tone for the Hospital. You must take responsibility for the actions of your staff. You will be accountable for making sure that your staff understand and apply the ethical standards set forth in this booklet. This is accomplished through adequate training, supervision, and vigilance. You must also listen to your staff's questions and diligently act on their concerns.

If you are confronted with an "ethical" situation, judge your response or actions by the following:

- ◆ Does it comply with the law and/or Rogers Memorial Hospital policies and procedures?
- ◆ How would it look to your family and friends, our clients, patients, and the general public?
- ◆ If you know its wrong, do not do it!
- ◆ If you are not sure, ask. Keep asking until you get an answer that makes sense. Please use the resources available to you with the Hospital to solve ethics questions before they become problems!

ROGERS MEMORIAL HOSPITAL COMMITMENT TO AN ETHICAL WORKPLACE...

All Rogers Memorial Hospital Staff will...

- ◆ Treat patients with dignity and respect, always focusing on the best interest of the patient.
- ◆ Never pay (in cash or in kind) anyone for referrals.
- ◆ Ensure that billing and coding for services rendered is accurate and complete and all accounting records accurately reflect the services provided.
- ◆ Avoid any situations resulting in conflicts of interest with Hospital business.
- ◆ Market services in compliance with state and federal requirements and forego any business which can only be obtained by improper or illegal means.
- ◆ Create a workplace, which is free from harassment, drugs, narcotics, alcohol, and discriminatory practices.
- ◆ Comply with all laws and policies designed to protect safety, health and the workplace.
- ◆ Comply with the law and cooperate with any reasonable government investigation.
- ◆ Be familiar with the Hospital's policies and document retention, and agree to abide by all laws, regulations, and contractual requirements regarding the retention of records.

Admission and Treatment

Assessments. The purpose of an assessment is to determine whether an individual has a clinical need for treatment and to recommend the most appropriate level of care to meet that need. Rogers Memorial Hospital may provide or arrange for face-to-face assessments by qualified providers for individuals requesting such services. In responding to telephone inquiries, Rogers Memorial Hospital staff will carefully assess the clinical needs of the patient. These procedures allow Rogers Memorial Hospital to continue to serve those who need our services.

Patients deserve to be treated at all times with dignity and respect. Rogers Memorial Hospital gives each patient a Bill of Rights upon admission and maintains those rights throughout treatment. Rogers Memorial Hospital keeps patients' records strictly confidential as required by law.

Rogers Memorial Hospital only admits patients into the treatment continuum who need and will benefit from the treatment Rogers Memorial Hospital provides. Rogers Memorial Hospital uses standardized clinical admission criteria to determine whether to admit an individual into its patient care continuum. Only a physician or mental health professional makes that determination as required by State law. Rogers Memorial Hospital does not pay bonuses of any type to staff or other individuals working with Rogers Memorial Hospital in the intake/admission process based on the number of patients admitted or the length of the patients' stay. Rogers Memorial Hospital expects its System CEOs, Managers, and Officers, to ensure that Rogers Memorial Hospital personnel and medical staff never feel pressured to recommend an admission or to admit patients on any basis other than medical need.

Each individual patient deserves to be treated as an individual. Rogers Memorial Hospital professionals develop treatment plans in concert with the attending physician to meet the specific needs of every patient, utilizing a multi-disciplinary approach. Treatment is provided in the least restrictive environment appropriate to individual patient needs. Rogers Memorial Hospital is committed to creating a safe, compassionate treatment environment where patients and their families begin to understand their individual illnesses and start the recovery process.

Treatment Planning. At the time of assessment, information is provided on the anticipated treatment plan as well as financial information. Discharge planning begins at the time of admission and continues throughout the treatment process. The patient, patient's family, loved ones, and the clinical teams are all involved in the discharge planning process. The attending physician discharges a patient with an aftercare or follow up plan, including interaction with community organizations and support groups whenever possible. Rogers Memorial Hospital does not influence attending physicians or other professionals to admit or discharge patients, solely on the basis of financial resources.

Length of Stay. Length of stay is to be based primarily on clinical considerations. Rogers Memorial Hospital also necessarily takes into consideration other factors such as family/community support, rehabilitation requirements, geographic location, and financial resources in determining the most appropriate treatment and plan for continuing care. It is Rogers Memorial Hospital's policy that patients only be discharged or transferred by the physicians when it is clinically appropriate to do so.

Quality of Care. Rogers Memorial Hospital provides to its patients treatment which is consistent with sound medical practices and professionally recognized standards in behavioral health care industry. Rogers Memorial Hospital also provides to its patients treatment that is consistent with applicable laws, regulations, policies, requirements, and/or standards established by its payers.

Medical Records Documentation. Medical Records documentation must meet the requirements of the Medical Staff By-laws, Hospital policies, applicable law, regulations and standards (e.g., Joint Commission, Medicare, Medicaid, CHAMPUS). Where appropriate, medical records documentation should also attempt to reflect the standards or requirements of third party payers or their outside review agents. Late entries must be clearly labeled as such in the medical records.

Credentialing: The purpose of the credentialing process is to assure that only fully qualified professional staff are permitted to practice in a Rogers Memorial Hospital facility. Identification of individuals requiring credentialing will be subject to primary source verification and checking references in compliance with Medical Staff By-laws.

REFERRALS

Rogers Memorial Hospital does not pay for referrals. Rogers Memorial Hospital does not pay anyone—staff, physicians, or mental health professionals—for referrals. Rogers Memorial Hospital only pays for services provided to the system or its patients.

Rogers Memorial Hospital does not make payments or provide non-cash benefits (e.g. office space) to any non-employed mental health professional physician providing services to the hospital without a written contract. Rogers Memorial Hospital requires mental health professionals and physicians to submit invoices outlining specific dates, hours, and type of services performed prior to any payment being issued.

Physicians and mental health professionals who are not staff to Rogers Memorial Hospital are free to refer patients to any person or entity they deem appropriate. Where Rogers Memorial Hospital staff are in a position to make referrals, they shall make such referrals solely based on what is best for the individual seeking treatment, and without regard to the number of referrals any physician or mental health professional has made to Rogers Memorial Hospital.

Rogers Memorial Hospital does not pay patients. Rogers Memorial Hospital does not waive deductible, co-payments or otherwise provide financial benefits to patients in return for admissions. Under certain circumstances, Rogers Memorial Hospital may provide appropriate financial accommodation (such as allowing monthly payments over time or charity care) to patients based purely on the financial need of the patient.

BILLING AND ACCOUNTING

Billing. Rogers Memorial Hospital bills only for services rendered—nothing less and nothing more. Rogers Memorial Hospital must comply with special billing requirements for government-sponsored programs and other payers. All Rogers Memorial Hospital staff must exercise care in any written or oral statement made to any government agency or other payor. Rogers Memorial Hospital facilities must bill for services using billing codes that accurately describe the services that were provided. Rogers Memorial Hospital will not tolerate false statements by Rogers Memorial Hospital staff to a government agency or other payor. Deliberate or negligent misstatements to government agencies or other payors may expose the staff member involved to criminal penalties.

Accounting. Federal and State Laws require companies to maintain accurate books and records. No code of conduct can review the extensive accounting requirements which Rogers Memorial Hospital must fulfill. To meet these obligations, therefore, Rogers Memorial Hospital must rely on staff truthfulness in accounting practices. Rogers Memorial Hospital financial reporting system must contain accurate entries which reflect all Rogers Memorial Hospital financial transactions. Rogers Memorial Hospital staff must not engage in any conduct that results in misleading entries made in any record.

CONFLICT OF INTEREST

Each Rogers Memorial Hospital staff member has a duty of loyalty to Rogers Memorial Hospital. Rogers Memorial Hospital staff must avoid any actions that may involve, or may appear to involve, a conflict of interest with their obligations to Rogers Memorial Hospital.

Competitors. Rogers Memorial Hospital staff should not serve as a director or officer or receive compensation from, or provide counseling or other services to hospitals or firms in competition with Rogers Memorial Hospital in the health care industry without written consent of their supervisor.

Suppliers. Rogers Memorial Hospital staff who deal with suppliers must do so in a reputable, professional, and legal manner. To avoid even the appearance of impropriety, Rogers Memorial Hospital staff should decline any personal gifts, including discounts, the acceptance of which would raise even the slightest doubt of improper influence. Discounts that are available to all Rogers Memorial Hospital staff and staff of other companies may be accepted. Rogers Memorial Hospital staff shall decline any personal gifts worth more than \$100 from present or prospective suppliers. When a gift in excess of \$100 is offered, Rogers Memorial Hospital should request that either (1) the supplier reduce Rogers Memorial Hospital's bill by that amount; (2) the supplier provide a

comparable amount of free services to Rogers Memorial Hospital or (3) the supplier allow Rogers Memorial Hospital to raffle off the gift to Rogers Memorial Hospital staff member. Management staff at the facility are not eligible for the raffle.

A practice utilized by some in the past is making charitable donations in the name of the gift recipient to a local charity. This practice would be appropriate, but again, should follow the above stated guidelines.

Business Information. Rogers Memorial Hospital staff may not use for their personal benefit any information acquired as a result of the staff member's relationship with Rogers Memorial Hospital. Staff should disclose business information only as required in the performance of their job or as expressly authorized by Rogers Memorial Hospital. Violation of this policy may result in personal liability to the staff member for the benefit gained from improper use of such information or any damages sustained by Rogers Memorial Hospital as a result of improper disclosure of such information.

Disclosure of Possible Conflicts of Interest: Staff should disclose possible conflicts of interest involving themselves or their immediate families (spouse, parents, brothers, sisters, and children). This reporting may be done in a number of ways, including contacting your immediate supervisor, department head or Corporate Compliance Officer.

SOFTWARE COPYRIGHT INFRINGEMENT

Rogers Memorial Hospital licenses the use of the computer software from a variety of outside vendors. Unauthorized copying of software programs could expose you individually and Rogers Memorial Hospital to litigation and result in damage claims from software vendors. No Rogers Memorial Hospital staff shall make a copy of copyrighted software for personal or company use if such reproduction is not permitted by written license agreement. All Rogers Memorial Hospital software programs are for the company purposes only.

ELECTRONIC MAIL

Any communications on E-mail by Rogers Memorial Hospital shall be deemed company property and will be accessible to the staff member's supervisor and the hospital officers. Patient information will be sent via external email using the hospital secure access. And only with patient signed authorization.

BUSINESS DEVELOPMENT

Rogers Memorial Hospital will forego any business which can only be obtained by improper and illegal means. Rogers Memorial Hospital will not make any unethical or illegal payments to anyone to induce the use of our services. Further, no Rogers Memorial Hospital staff member should ever enter into any business arrangement which is either unethical or illegal with any potential referral source, payor, competitor, or patient or any other parties. If you are not certain as to the ethical or legal nature of a given business arrangement, you should immediately consult with your supervisor, or the Corporate Compliance Office.

All Rogers Memorial Hospital advertising must be truthful and not misleading. Rogers Memorial Hospital staff must submit all advertising and marketing materials to Rogers Memorial Hospital Marketing Department for approval before use. Specific claims about the quality of the Company's services must be supported by evidence to substantiate the claims made. All price advertising must accurately reflect the true charge for services provided to our patients.

Rogers Memorial Hospital's best advertisement is Rogers Memorial Hospital itself. Rogers Memorial Hospital does not use advertisements or marketing programs which might cause confusion between our services and those of our competitors. Rogers Memorial Hospital does not disparage the service or business of a competitor through the use of false or misleading representations.

Rogers Memorial Hospital does not compensate staff based on patient admissions. Rogers Memorial Hospital does not pay incentives to staff based upon the number of persons admitted for treatment. The decision to admit individuals referred for assessment is made by physicians.

HUMAN RESOURCES

D **rugs, Narcotics, and Alcohol.** Rogers Memorial Hospital prohibits the use, sale, dispensing, or possession of illegal drugs and narcotics by its staff, whether on or off Rogers Memorial Hospital premises. Rogers Memorial Hospital also prohibits the consumption of alcoholic beverages on Rogers Memorial Hospital premises without CEO authorization. Rogers Memorial Hospital may immediately discipline or discharge staff who violate this policy.

Any staff member reporting to work or discovered at work in a condition that suggests that he or she is under the influence of narcotics, drugs, or alcohol will not be permitted to report to or remain on his job. The supervisor will escort the staff member to the Human Resources Department for consultation and possible testing, outside regular business hours staff will be escorted to local med/surg facility for required testing.

In order to ensure the safety of all Rogers Memorial Hospital staff and patients, any staff member who has been directed by a physician to take a prescription drug that may adversely affect or impair performance on the job must report that circumstance to his immediate supervisor and Employee Health, along with acceptable medical documentation. The Human Resources Department will then determine whether the effects of the medication pose a potential safety risk and/or may impair the staff member's efficiency and effectiveness. Reasonable accommodation will be made for staff suffering from any disability so long as the accommodation does not create an undue risk of harm to the staff, patients, or others.

Consistent with Rogers Memorial Hospital's overall mission as a company, Rogers Memorial Hospital's Human Resources Department can facilitate, via employee assistance program, confidential counseling for drug or alcohol dependence problems.

The Departments may also assist with medical/psychological treatment and arrangements for leaves of absence.

Equal Employment Opportunities.

In determining suitability for employment, promotions, transfers, demotions, and wages, Rogers Memorial Hospital looks only at the individual's ability to perform the essential functions of the job. Rogers Memorial Hospital extends equal employment opportunities and freedom from harassment to all individuals, regardless of sex, race, age, color, religious beliefs, marital status, citizenship status, national origin, sexual orientation or physical/mental disabilities.

Rogers Memorial Hospital expects everyone associated with Rogers Memorial Hospital to treat co-workers and patients with respect and courtesy. Rogers Memorial Hospital will not tolerate having its staff subject to discrimination or harassment based on any of the above factors, and will discipline or discharge those who violate this policy. Freedom from harassment specifically includes freedom from intimidating, hostile or offensive activities unwelcome sexual advances, requests for sexual favors, or other verbal, graphic, or physical conduct of a sexual nature.

SAFETY, HEALTH AND THE WORKPLACE

The Hospital is committed to providing a safe and healthy work place for our patients, staff and for visitors to our premises. It is Rogers Memorial Hospital's policy that all staff report any condition that could create a hazard in their workplace or patient care area. In keeping with this policy, staff should report to his/her manager or House Supervisor, any conditions which are perceived to be unsafe, unhealthy or hazardous to the workplace.

MISCONDUCT

It is the policy of Rogers Memorial Hospital to investigate allegations of misconduct by employees, medical staff, vendors, volunteers, contracted service personnel or any other individual with access to Rogers patients, and to take appropriate action based on the result of the investigation. Misconduct includes abuse or neglect of hospital patients or misappropriation of hospital patients' property as defined under HFS 13, of the Wisconsin Administrative Code.

Examples include but are not limited to:

- ◆ Physical abuse: hitting, slapping, pinching or kicking, to intentionally cause harm; Sexual abuse: harassment, inappropriate touching or assault;
- ◆ Verbal abuse: threats of harm, saying things to intentionally frighten a client;
- ◆ Mental abuse: humiliation, harassment, intimidation with threats of punishment, of depriving a client of care or of the client's possessions;
- ◆ Neglect: intentionally withholding care, failure to carry out a plan of care that could reasonably be expected to cause pain, injury or death of a client
- ◆ Misappropriation of property: theft of money, identity, credit cards or jewelry, misuse of property, such as using a client's phone without consent.

Allegations of patient mistreatment will be investigated and reported as defined by hospital policy.

GOVERNMENT INVESTIGATIONS

It is Rogers Memorial Hospital's policy to comply with the law and to cooperate completely with any reasonable government investigation. In so doing, however, it is important that the legal rights of Rogers Memorial Hospital and of the personnel involved be protected. If any staff member receives any inquiry, subpoena, or other legal document regarding Rogers Memorial Hospital business, whether at home or in the workplace, from any government agency, Rogers Memorial Hospital requests that the staff member notify his or her supervisor immediately. The law guarantees all of us a right to be represented by legal counsel during any investigation or inquiry of any governmental agency. In view of the technical and legal nature of some of these investigations, we believe that Rogers Memorial Hospital itself should be so represented and that all staff should at least be made aware of the opportunity for such representation.

Sometimes, it is difficult to tell when a routine government inquiry, audit or review graduates into a more formal government investigation. Rogers Memorial Hospital relies on the common sense and alertness of its staff for making this important determination. In case of any doubt, staff should consult with their supervisor or the Risk Manager.

HEALTH INFORMATION AND CONFIDENTIALITY

It is the policy of Rogers Memorial Hospital to maintain patient and staff confidentiality. Any information oral or recorded in any medium (paper, electronic) that relates to an individual past, present or future physical or mental health conditions will not be released intentionally or unintentionally without a signed authorization or verbal consent of the patient or guardian. It is Rogers Memorial Hospital intent to fully maintain the privacy and security of patient information according to the Health Insurance Portability and Accountability Act (HIPAA). Staff are to access patient information on a Need to Know basis, only.

DOCUMENT RETENTION

Rogers Memorial Hospital retains records according to the Wisconsin Hospital Association Health Law Manual Record Retention Guide, current edition. Ask before you destroy.

HELPLINE

In order to provide staff with every avenue possible in which to raise their concerns, Rogers Memorial Hospital has a Corporate Compliance Helpline (262) 646-1301. A Corporate Compliance Administrator operates the Helpline and each call will be treated confidentially, and all calls will be investigated. Rogers Memorial Hospital absolutely prohibits any staff member from taking retribution against a helpline caller. Thank you for your ongoing compliance with the policies outlined in this Corporate Compliance Handbook.

**Rogers Memorial Hospital
Corporate Compliance Acknowledgement Statement**

I, _____ have received and reviewed a copy
(print name)
of the Rogers Memorial Hospital Corporate Compliance handbook and agree
to follow established rules and guidelines.

I understand that if I need clarification on the handbook I can consult with
my Supervisor or Administration.

I understand the information in this handbook is subject to change by
Administration at any time with or without notice.

I understand the change in the handbook may supersede, modify or eliminate
other existing editions.

Signature

Date