

CHILDREN'S HEALTHCARE OF ATLANTA

MISSION, VISION, & VALUES

MISSION

To enhance the lives of children through excellence in patient care, research and education.

VISION

To transform pediatric healthcare and be the leading voice for the health of Georgia's children.

VALUES

- Integrity: Being honest, ethical and committed to all we do
- Respect: Appreciating all people, work and ideas
- Nurturing: Fostering the care, growth and development of the individual
- Excellence: Delivering the highest level of care and service
- Teamwork: Working together to achieve our goals

STANDARDS OF CONDUCT

QUALITY OF CARE

Children's Healthcare of Atlanta's first responsibility is to provide quality care and services to our patients, their families, legal guardians and communities we serve.

- We will assess and address patient needs and strive to exceed their expectations.
- We will treat our patients, employees, physicians and visitors with dignity, respect, compassion and courtesy.
- We seek to inform all patients and their parents (or legal guardians) regarding treatment recommendations and alternatives and the risks associated with the care they are seeking.
- We will seek to ensure that admissions, intra and inter facility transfers, and discharges are medically appropriate and in compliance with applicable laws, regulations, requirements and policies.
- We will treat patients without regard to the race, color, national origin, religion, gender or disability of such person or any other classification prohibited by law, and in accordance with applicable policies.
- Clinical decisions will reflect consideration of the best interest of the patient and will be based on the patient's health care needs, with input and consultation from the organizations' Bioethics Committee(s), when appropriate.
- We will employ and/or contract with appropriately licensed and/or credentialed providers with relevant training and experience to care for our patients.
- We will respect the human dignity of each patient and parent or legal guardian by sensitively responding to questions, concerns and needs in a timely manner.
- We will seek to protect the rights, health and safety of patients participating in clinical research investigations by supporting and monitoring valid and appropriate research.

COMPLIANCE WITH LAWS & REGULATIONS

Children's Healthcare of Atlanta will conduct its business and patient care operations in accordance with applicable laws, regulations and professional standards in order to maintain the integrity of our system.

- We will maintain complete and accurate patient medical records, which will be kept confidential; such information will be available only to those persons providing direct patient care or others having a "need to know" and authorized to review patient information. We have a written Privacy Notice that describes our privacy practices. It applies to all patient information and to employee information that may reside in the Occupational Health Department. We will be familiar with our privacy practices and will honor this commitment to handle all protected health information appropriately.
- We will refrain from conduct, which may violate the fraud and abuse laws. These laws prohibit (i) direct, indirect or disguised payments in exchange for referral of patients; (ii) submission of false or misleading claims for services; and (iii) making false representations to gain or retain participation in a program or to obtain payment for any service.
- We shall not hire or contract with individuals who have been sanctioned by the OIG or barred from federal or state procurement programs.
- We will require that all drugs and other controlled substances used in treatment are maintained, dispensed and transported in compliance with all applicable laws and regulations. We will comply with all requirements of the Emergency Medical Treatment and Active Labor Act (EMTALA).
- Business practices will be conducted ethically, responsibly and with truth and accuracy. We will strive to communicate our business ethics as reflected in our Standards of Conduct to vendors with whom we conduct significant business.
- As a nonprofit, tax-exempt organization, we have a legal and ethical obligation to act in compliance with applicable laws, engage in activities in furtherance of our charitable purpose, and use our resources to further the public good rather than private or personal interests of any individual. Consequently, we will avoid compensation arrangements in excess of fair market value.
- We will comply with applicable antitrust and similar laws that regulate competition. Such laws prohibit conduct such as price fixing, sharing pricing information with competitors, boycotts and unfair trade practices.
- It is our policy to recruit, train, promote, assign, transfer, lay off, recall and terminate employees without regard to race, color, sex, religion, national origin, age or disability, or any other classification prohibited by law.

- We provide information regarding security procedures to all members of the organization and uniformly apply and enforce our security procedures.
- It is our policy to manage and operate our business in a manner that respects our environment, conserves natural resources and disposes of waste in accordance with applicable laws and regulations.

BILLING & CODING

Children's Healthcare of Atlanta will maintain a commitment to fair and accurate billing that satisfies applicable governmental or third-party payor requirements.

- We will submit claims for payment and cost reports to Medicare, Medicaid and other federal health programs in accordance with current reimbursement rules, policies and procedures promulgated by the Centers for Medicare and Medicaid Services (CMS), the state Medicaid agency, any applicable fiscal intermediary or carrier of other agency with responsibility for the program in question.
- We will comply with the terms of our agreements with managed care organizations and other private payors.
- It is our policy to bill only for services that are medically necessary, actually provided and documented in the patient's medical records.
- It is our policy to maintain medical records that will accurately document the care and treatment rendered to the patient and that will support the diagnosis and procedures reported on the claim.
- We will not knowingly submit for payment or reimbursement a claim, invoice, bid proposal or other document that is false, fraudulent or fictitious.
- It is our policy to assign billing codes that accurately reflect the services and products that were provided.
- Compensation for billing department personnel (including coders) and billing consultants shall not contain any financial incentive to submit improper claims or codes.
- We will randomly examine previously submitted claims for accuracy and compliance with applicable rules and regulations and shall advise governmental and/or non-governmental payors of incorrectly submitted claims, if any, and reimburse such payors for overpayments, if any.
- We will not routinely waive insurance copayments or deductibles.
- We will provide information and assistance to patients or legal guardians seeking to understand the charges for services provided.
- We will respond to patient or patient's family concerns voiced with regards to billing issues and we will send an itemized bill upon request.
- We will store all records in a secure location for a period of time required by law. The premature destruction or alteration of any document in response to, or in

anticipation of, a request for those documents by any government agency or court is strictly prohibited.

PROTECTION OF PROPERTY

Children's Healthcare of Atlanta is committed to protecting its property, and the property entrusted to us, against loss, theft or misuse. Property includes physical assets, funds and confidential/proprietary information.

- We will correctly use and care for property and equipment entrusted to us.
- We will respect the property of patients, families, legal guardians, employees, physicians and visitors.
- We will protect confidential patient and proprietary system information and will not use or reveal such information except in the proper performance of duties.
- We will not communicate or transfer any confidential or proprietary information or documents to any unauthorized persons.
- We will appropriately inventory and maintain supplies in a secure manner.
- We will dispose of all surplus or obsolete property and equipment according to established procedures.
- We will not permit the making of unauthorized copies of computer software or using personal software on computer equipment.

CONFLICTS OF INTEREST

Children's Healthcare of Atlanta (**Children's**) Board members, physicians and employees are expected to avoid conflicts or even the appearance of conflicts between their private interests and those of the organization.

Employees

- We will avoid any activity that might conflict, or appear to conflict, with the interests of the Organization. A conflict exists whenever an employee or a related party (e.g., family member, friend, or business associate) may receive a benefit from any decision or action taken by the employee.
- Employees should avoid doing personal business with vendors that provide services for which the employee has direct or indirect responsibility.
- We will report or disclose any potential conflict related to our workplace responsibilities.
- We will exercise good faith and fair dealing in all transactions that involve our responsibilities to the organization.
- We will not misuse our position for personal gain.
- We will not accept money or gifts other than those of a nominal or token nature from patients, volunteers, vendors, or their families. (This limitation does not apply to employees who, on behalf of **Children's**, accept money or gifts for **Children's** and the children we serve.)
- **Children's** does not object to employees holding other jobs as long as they can effectively meet the performance standards for their job at **Children's** and no conflict is caused by the arrangement. If an employee has any question as to whether or not there is a conflict, the employee should clear the concern with his/her supervisor.
- It is our policy that employees will not be supervised by a family member, in-law or partner in romantic or personal relationships.

Board Members, Key Employees and Physicians with Administrative Responsibilities ("Covered Persons")

- Covered persons owe a duty of undivided and unqualified loyalty to the organization(s) they serve. Persons holding such positions may not use their positions to profit personally or to assist others in profiting in any way at the expense of the organization.
- Covered persons will disclose potential conflicts of interest to the organization(s) pursuant to applicable policies.

EMPLOYEE RESPONSIBILITY

Employees are expected to follow the Children's Healthcare of Atlanta (**Children's**) values, Standards of Conduct, policies and procedures, federal and state laws and regulations. Anyone with knowledge of a violation of the values, Standards of Conduct, policies and procedures, or laws or regulations must report this information as promptly as possible. Violations of policy including failure to report a known violation shall result in appropriate disciplinary action.

- Employees will not directly or indirectly pay any form of remuneration, overt or covert, in cash or in kind, with the intent of obtaining any service that is paid for in whole or part by Medicare, Medicaid or any other federal health program.
- Employees or agents will not improperly influence the award of any contract.
- Employees or agents shall neither submit nor concur in the submission of any claims, invoices, bids, proposals or other documents of any kind that are false, fictitious or fraudulent.
- Employees reporting costs to the federal or state government or to a private third-party payer for purposes of reimbursement are required to report such cost accurately and in a manner that satisfies applicable governmental or third party payer requirements.
- Employees may receive and/or extend business courtesies that are reasonable and appropriate in accordance with our applicable policy.
- Employees may accept and/or provide nominal gifts in accordance with our applicable policy. (This limitation does not apply to employees who, on behalf of **Children's**, accept money or gifts for **Children's** and the children we serve.)
- We expect that each of our employees will refrain from engaging in activities that may jeopardize the tax-exempt status of the organization, including a variety of lobbying and political activities.
- Employees in supervisory positions should not place or seem to place pressure on subordinates that could cause them to deviate from acceptable Standards of Conduct.
- Employees who wish to report a concern, issue, problem or violation should communicate such concerns to (i) his or her supervisor or other member of the management team; (ii) Human Resources department personnel; (iii) the Compliance Office; (iv) the Chief Compliance Officer; (v) the Compliance Connection Line or (vi) online at <http://choa.silentwhistle.com>.
- Employees are never required to perform an act requested by a supervisor that he/she believes to be unethical or illegal.

HEALTH AND SAFETY

Children's Healthcare of Atlanta is committed to providing our patients, employees, staff members, visitors and community with a safe environment in which to heal, work and visit.

- We will establish a comprehensive safety program, take reasonable precautions and follow our established safety rules and regulations to maintain a safe environment for our patients, employees and visitors.
- We will strive to provide an environment that is free from violence. Unauthorized weapons of any kind are strictly prohibited in the workplace.
- Possession or consumption of alcohol or illegal drugs or legal drugs that were illegally obtained, or reporting to work in an intoxicated condition, is strictly prohibited. This prohibition does not apply to employees taking over-the-counter and physician prescribed medication according to direction.
- It is our policy to dispose of hazardous waste material in accordance with applicable laws, regulations, policies and procedures.
- We will promptly report any injuries to a patient, employee staff member or visitor in accordance with applicable policies and any applicable laws and regulations.

HUMAN RESOURCES

Children's Healthcare of Atlanta (**Children's**) is committed to the fair and equitable treatment of employees and encourages employees to develop their potential. **Children's** values clearly state that we treat our fellow employees with consideration and respect for one another, regardless of status or position.

- It is our policy to provide a work environment where all employees are free from harassment and intimidation.
- No form of harassment or discrimination on the basis of race, color, sex, religion, national origin, age, disability, or any other classification prohibited by law will be permitted. Each allegation of harassment or discrimination will be promptly investigated in accordance with applicable Human Resources policies and laws.
- Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature is strictly prohibited.
- Fighting, using threatening words, displays of aggression, possession of any weapon or pranks in the workplace is strictly prohibited.
- We are committed to providing equal employment opportunities to all qualified applicants and employees, without regard to race, color, sex, religion, national origin, age, disability, or any other status protected by law.
- Salary, benefit and other personal information relating to employees shall be treated as confidential. Personnel files, payroll information, disciplinary matters and similar sensitive information shall be maintained in a manner designed to ensure confidentiality in accordance with applicable laws.
- We will strive to keep open lines of communication and welcome input from our employees.

NON-RETALIATION POLICY

No disciplinary action or other form of retaliation shall be taken against any employee for reporting an issue, problem, concern or violation to management, Human Resources, the Compliance Office, the Chief Compliance Officer, the Compliance Connection Line, or online at <http://choa.silentwhistle.com>.

Employees who wish to report a concern, issue, problem or violation should communicate such concerns to (i) his or her supervisor or other member of the management team; (ii) Human Resources department personnel; (iii) the Compliance Office; (iv) the Chief Compliance Officer; (v) the Compliance Connection Line; (vi) online at <http://choa.silentwhistle.com>.

You have a responsibility to report wrong-doing. The government grants employees the right to report in good faith, concerns of fraud and abuse to the federal government. Employees who report directly to the federal or state government are also protected under this non-retaliation policy, provided that the employee's actions don't create a non-compliant situation or event.

COMPLIANCE REPORTING

Children's Healthcare of Atlanta (**Children's**) recognizes that there may be times when concerns cannot be properly addressed through the normal chain-of-command. When such situations arise, employees are encouraged to contact the Compliance Office, the Compliance Connection Line or report online at <http://choa.silentwhistle.com>.

Children's established the Compliance Connection Line operation with the toll-free number 1-877-373-0126. Hours of operation are 24 hours a day, 7 days per week.

PROFESSIONAL STAFF RESPONSIBILITY

Professional staff members are expected to comply with all provisions of Professional Staff Bylaws, Policy on Appointment, Reappointment and Clinical Privileges, Rules and Regulations, as well as Hospital bylaws, applicable Hospital policies and procedures, the standards of the Joint Commission on Accreditation of Healthcare Organizations and the Children's Healthcare of Atlanta's (**Children's**) Standards of Conduct.

- Any Professional Staff member with knowledge of a violation of the Standards of Conduct, **Children's** policies and procedures, or laws and regulations should report this information to his or her Service Chief/Medical Director, the Senior Vice President of Medical Affairs, the Compliance Office, the Chief Compliance Officer, the Compliance Connection Line or report online at <http://choa.silentwhistle.com>.

PHYSICIAN CONTRACTING

Children's Healthcare of Atlanta is committed to contracting with physicians in a manner that complies with applicable laws, regulations, policies and our business ethics. We will observe the following standards and procedures relative to any contract with physicians:

- The contract shall be in writing.
- The contract shall be executed by the Chief Executive Officer, Executive Vice President, Clinical Care or Senior Vice President, Chief Medical Officer.
- The term of the contract shall be for at least one year. Contracts that give an exclusive right to hospital-based physicians to perform services may not exceed three years and must follow the applicable procedural reviews process. Contracts may be terminable for good cause prior to their expiration, provided that no other contract dealing with the same subject matter is executed during the remainder of the contract term.
- Any compensation paid to or remuneration received by physicians must be set in advance, be reasonable and reflect fair market value.
- The compensation or remuneration available to the physician under the contract shall not vary based on the volume or value of services referred or other business generated by the physician, except that the physician may be paid a productivity bonus as permitted by law. If the physician is to be paid a productivity bonus, the total available compensation shall be limited to an amount consistent with reasonable compensation for the services rendered.
- The contract shall further the organization's charitable mission to serve the community.
- All physician compensation policies and compensation ranges must be approved by the Board or a committee appointed by the Board after reviewing appropriate data as to the reasonableness of compensation or remuneration, such as:
 - compensation paid by similarly situated organizations, both taxable and tax-exempt, for functionally comparable positions;
 - the availability of similar specialties in the geographic area;
 - independent compensation surveys by nationally recognized independent firms;
 - actual written offers from similar institutions competing for the services of the covered person;
 - verified historical data regarding prior compensation of the individual in question;
 - independent appraisals; or

- government data regarding reasonable compensation, such as the Medicare Reasonable Compensation Equivalents.
- A form for requesting approval of physician contracts is included in our contract review policy and such forms shall be used and appropriately maintained in all circumstances.
- Contracts pursuant to which physicians who will not be employees are given financial incentives to relocate to the community must also comply with the physician recruitment guidelines issued by the IRS.
- These standards apply not only to contracts with individual physicians, but also to contracts with physician groups, family members of physicians and any organization in which 35 percent or more of the voting power is controlled by physicians.
- These standards shall apply to leases as well as contracts.