



## **Code of Conduct**

IPC Healthcare, Inc. has adopted the following Code of Conduct. This Code applies to all employees and Directors. It is the foundation of our company Compliance Program.

- IPC Healthcare is committed to ethical and legal behavior in every aspect of our business. We comply with laws, regulations and policies. We conduct our business in an ethical manner, using sound business and compliance principles. We do not engage in activities that are fraudulent or abusive.
- We provide a company culture that is committed to providing all employees with sufficient information to comply with laws, regulations, and policies, as well as the resources to resolve ethical dilemmas. We encourage every one in the organization to share concerns or questions when they arise.
- While all IPC employees are obligated to follow our code, we expect our leaders to set the example and to be a model in every respect.
- All IPC employees must sign an acknowledgement that they have received the Code of Conduct, understand that it represents mandatory policies of IPC and agree to abide by it. New employees will be required to sign this acknowledgement as a condition of employment.
- We follow the Compliance Program recommended by the federal Office of the Inspector General. We comply with laws and guidelines related to billing coding, documentation, claims processing, collections, record retention, confidentiality of patient information, anti-kick back statutes, and other similar laws and requirements.
- All employees must participate in the company's compliance training programs as required for their job and role. All employees must participate in the company's internal and external compliance auditing programs as appropriate.
- Participation in and implementation of Compliance policies and procedures will be considered when employee performance is evaluated.

## **Physician and Mid-Level Providers**

We employ individuals (physician/provider and non-physician) who are permitted to participate in federal Medicare/Medicaid Programs. We check the Medicare/Medicaid sanction listing regularly to ensure that all employees are able to participate. We expect employees to notify us immediately if they become sanctioned and unable to participate.

Only properly licensed physicians and mid-level providers are employed to provide care to our patients. These individuals perform within their licensed scope of practice, and in accordance with federal and state guidelines as well as the credentialing policies/bylaws of the hospital or facility where they are privileged to provide patient care. It is the responsibility of the licensed professional to maintain current licensure and to notify IPC promptly if there is any encumbrance placed upon their license (probation, suspension, or revocation).

Our providers are required to document clearly and appropriately in the medical record, ensuring that such documentation properly reflects the patient's condition and supports the diagnosis and billing code selected. Our providers are responsible for selecting the correct billing code, and for seeking assistance from the Compliance Department when there is a question or concern.

## **Billing, Coding, and Claims Correctness**

We prohibit any employee (physician and non-physician) from knowingly presenting or causing to be presented claims for payment or approval that are false, fictitious, or fraudulent. Any employee who knowingly presents or causes to be presented claims for payment or approval that are false, fictitious or fraudulent will be subject to disciplinary action, which may include termination of employment. Additionally, such action may be subject to civil or criminal penalties.

## **Maintaining Confidentiality of Business and Clinical Information:**

Confidential information about our organization's strategy and operations is a valuable asset. Although you may use confidential information to perform your job, it must not be shared with others unless the individuals have a legitimate need to know and have agreed to maintain the confidentiality of the information.

Confidential information includes, but is not limited to: personnel data, patient lists and clinical information, patient financial information, passwords, pricing and cost data, information pertaining to acquisitions, divestitures, affiliations and mergers, financial

data, details regarding federal, state and local tax examinations of the organization or its partners, research data, strategic plans, marketing strategies and techniques, supplier and subcontractor information, and proprietary computer software. If your relationship with IPC-The Hospitalist Company ends for any reason, you are still bound to maintain the confidentiality of information viewed during your employment.

Additionally, we maintain the confidentiality of patient health information in accordance with applicable state and federal guidelines, including the HIPAA Privacy Regulations, effective April 14, 2003.

## **Use of Communication Systems**

All communications systems, including electronic mail, Internet access, and voice mail, are the property of the organization and are to be primarily used for business purposes. Highly limited reasonable personal use of IPC communications systems is permitted. However, you should assume these communications are not private. Employees may not use internal communication channels or access to the Internet at work to post, store, transmit, download, or distribute any threatening materials; knowingly, recklessly or maliciously false materials, or obscene materials including anything constituting or encouraging a criminal offense, giving rise to civil liability, or otherwise violating any laws.

Employees who abuse our communications systems or use them excessively for non-business purposes may lose these privileges and be subject to disciplinary action, up to and including termination of employment.

## **Kickbacks**

We do not pay for referrals. We do not accept pay for referrals. Violation of this policy may have grave consequences for the organization and the individuals involved, including civil and criminal penalties. We do not engage in business relationships that might otherwise violate the fraud and kickback statutes.

## **Conflicts of Interest**

Conflicts of interest may occur if outside activities or personal interests influence or appear to influence your ability to make objective decisions in the course of your job responsibilities. A conflict of interest may also exist if the demands of any outside activities hinder or distract you from the performance of your job or cause you to use IPC resources for other than IPC purposes. It is your obligation to ensure that you remain free of conflicts of interest in the performance of your responsibilities at IPC. If you have any question about whether an outside activity might constitute a conflict of interest, you must obtain the approval of your supervisor before pursuing the activity.

## **Marketing and Advertising**

We may use marketing and advertising activities to educate the public, provide information to the community, increase awareness of our services, and to recruit employees. We will present only truthful, fully informative, and non-deceptive information in these materials and announcements.

## **Accepting Business Gifts or Courtesies**

Examples of business relationships include (but are not limited to) physicians, IPA's, health plans, hospitals or facilities, home health or DME vendors, pharmaceutical companies, and others who may provide services to IPC and/or receive services from IPC.

We recognize there will be times when a current or potential business associate may extend an invitation to attend a social event in order to further develop your business relationship. You may accept such invitations provided the cost associated with such an event is reasonable. In general it should not exceed \$100.00 per person, and no expense should be incurred for any travel costs or overnight lodging. Also, such events must be infrequent.

You are able to attend business meetings at which food, including meals, is provided. Such events are not subject to the

\$100.00 per person cost. If you are invited to attend a business meeting or training that includes overnight accommodations or travel costs, you must first receive approval from your supervisor before accepting.

## **Extending Business Courtesies or Gifts to Possible Referral Sources**

Any entertainment or gift involving physicians, facilities, or other persons who are in a position to refer patients to our practice must be undertaken in accordance with corporate policies. We will comply with all Federal laws, regulations, and rules regarding these practices.

## **Reporting Suspected Violations or Compliance Concerns**

*Employees who have a concern about compliance or believe a compliance violation is occurring should report their concern promptly to the IPC Confidential Hotline , (800) 513-9198 or online at [www.ipc-confidential-hotline.com](http://www.ipc-confidential-hotline.com).*

*You may also call the IPC internal Compliance Hotline at (888) 654-0879 or contact the Compliance Officer [kloya@ipcm.com](mailto:kloya@ipcm.com).*

*Each employee has an individual responsibility for reporting any activity by any employee, physician, subcontractor, or vendor that appears to violate applicable laws, rules, regulations, or this Code of Conduct.*

*We have a strict anti-retaliation policy. We do not allow retaliation, retribution, or harassment in any form to be directed against an employee who has reported a compliance concern in good faith. Anyone who retaliates against an employee who has reported a good faith compliance concern will be subject to disciplinary action.*

Employees may also feel that they need to report their concern directly to the US Federal Government. The contact information is listed below.

### **Contacting the HHS OIG Hotline**

Phone: 1-800-HHS-TIPS (1-800-447-8477)

Fax: 1-800-223-8164

E-Mail: [HHSTips@oig.hhs.gov](mailto:HHSTips@oig.hhs.gov)

TTY: 1-800-377-4950

Mail: Office of Inspector General  
Department of Health and Human Services  
Attn: HOTLINE  
PO Box 23489  
Washington DC 20026

We will investigate all reported concerns promptly while maintaining confidentiality to the extent possible. The Compliance Officer will coordinate any findings from the investigations and immediately recommend corrective actions or changes that need to be made. We expect all employees to cooperate with investigation efforts.

Any physician or employee knowing or suspecting that he or she may have knowledge of any practices that violate the IPC Billing Compliance Program will not be discriminated against nor retaliated in any manner for reporting such information to the appropriate authorities.

## **Internal Investigations and Corrective Action**

When an internal investigation substantiates a reported violation, it is the policy of the organization to initiate corrective action, including, as appropriate, making prompt restitution of any overpayment amounts, notifying the appropriate governmental agency, instituting whatever disciplinary action is necessary and implementing systemic changes to prevent a similar violation from recurring.

## **Consequences for Violation of the Code of Conduct**

All violators of this Code of Conduct will be subject to disciplinary action. The precise discipline utilized will depend on the nature, severity, and frequency of the violation.