

POLICY: CODE OF CONDUCT

PURPOSE:

To ensure the organization fulfills its ethical responsibility to patients, staff, physicians, third party payers, subcontractors, independent contractors, vendors, consultants, one another and the community. This Code of Conduct was developed to ensure we meet our ethical standards and comply with applicable laws and regulations.

DEFINITION:

TRMC: For the purposes of this Code of Conduct, TRMC refers to Tillamook Regional Medical Center, which includes all medical center departments, services, and clinics maintained and supported under the Department of Public Health hospital license.

TRMC Staff: For the purposes of this Code of Conduct, TRMC Staff refers to TRMC executives; employees; Graduate Medical Education physician residents; students; volunteers; contractors and subcontractors who provide patient care; contractors and subcontractors who provide billing and coding services; and contractors and subcontractors who develop, manage, and review TRMC Arrangements.

TRMC Medical Staff: For the purposes of this Code of Conduct, TRMC Medical Staff refers to members of the TRMC Medical Staff and TRMC credentialed allied health practitioners.

Board: For the purposes of this Code of Conduct, the Board refers to both the Adventist Health Legal Board and the TRMC Governing Board.

POLICY:

It is the responsibility of every TRMC Staff member, and Board member to act in a manner that is consistent with the TRMC's Guiding Principles and this Code of Conduct. Additionally, TRMC Medical Staff are governed by specific conduct rules outlined in their Bylaws.

Introduction:

Tillamook Regional Medical Center is committed to upholding the highest standards of ethical behavior in improving the quality of life and health of our community. We are driven by our Mission, Vision and Guiding Principles.

Our Mission:

To share God's love by providing physical, mental and spiritual healing

Our Vision:

Adventist Health will be a recognized leader in mission focus, quality care and fiscal strength

Our Guiding Principles: I will:

1. Take personal responsibility to ensure the safety of patients, co-workers, and all others I come into contact with while at work.
2. Reach for the highest standards in my work.
3. Be honest in all things.
4. Provide services that my customers say are excellent.
5. Use all resources responsibly and efficiently.
6. Treat others with the same compassion and respect I would want my family to experience.

Our Responsibilities as the Chief Executive Officer, Chief Financial Officer and Senior Leaders:

TRMC Senior Leadership is responsible for maintaining a culture that supports this Code of Conduct. Additionally, all provisions of this Code of Conduct and particularly those provisions relating to ethical conduct, conflicts of interest, compliance with law, and internal reporting of violations of the Code, bind the CEO and Senior Financial Officer. The CEO and Senior Financial Officer also have the responsibility for full, fair, accurate, timely and understandable disclosure in the periodic reports and submissions filed by TRMC with the designated Medicare Administrative Contractor for California, Centers for Medicare & Medicaid Services (CMS), various Federal and State agencies, the Internal Revenue Service, the Office of Statewide Planning Health and Development (OSHPD), and the Joint Commission as well as in other public communications made by the organization. Accordingly, it is the responsibility of the CEO and each senior leader to promptly bring to the attention of the Local Compliance Committee any information that materially affects the disclosures made by TRMC in its public communications. The CEO and Senior Financial Officer also shall bring promptly to the attention of the Local Compliance Committee any information he/she may have concerning significant deficiencies in the design or operation of internal controls which could adversely affect TRMC's ability to record, process, summarize and report financial data; or any fraud, whether or not material, that involves management or other TRMC Staff who have a significant role in TRMC's financial reporting, disclosures or internal controls.

Our Responsibilities as Leaders:

While all TRMC Staff is obligated to follow our Code of Conduct, we expect our leaders to set an example and be role models. We expect everyone in the organization with supervisory responsibility to exercise that responsibility in a kind, sensitive, thoughtful, and respectful manner. We also expect that leaders will ensure their teams have sufficient information to comply with laws, regulations, and policies, as well as the resources to resolve ethical dilemmas. Leaders must help to support a culture within TRMC that promotes the highest standards of conduct, ethics and compliance. This culture must encourage everyone in the organization to share concerns immediately. We must never sacrifice ethical and compliant behavior in the pursuit of business objectives.

Our Responsibility to Our Patients

Quality of Care and Patient Safety

We are committed to the delivery of safe, effective, efficient, compassionate and satisfying patient care. We treat all patients with warmth, respect and dignity and provide care that is both necessary and appropriate. We ensure that the TRMC Staff provide appropriate, quality patient care by:

- Individualizing care for each patient with care plans that document the reason(s) for the level of care, goals and objectives, interventions and participation by appropriate professionals, and which are reviewed and revised according to each patient's needs. Clinical decision making is never based on financial class of patients, ability to pay, or referrals.
- Ensuring we never discontinue necessary patient treatment, or provide unnecessary patient care for financial reasons.
- Using adequate numbers of appropriately trained staff to implement each patient's care plan.
- Establishing a system that incorporates the use of best practices or established standards. TRMC uses generally accepted indicators that help us to measure the quality of care provided. Agencies that have developed these indicators include, for example, the Conditions of Participation of the Centers for Medicare & Medicaid Services (CMS), and the standards and surveys of The Joint Commission.
- Supporting our Medical Staff in monitoring quality, utilization of resources and the appropriateness of care plans.
- Providing TRMC Staff with adequate resources to do their work.
- Evaluating technological advancements occurring in the marketplace and allocating resources for the purchase of appropriate medical and other related equipment to ensure quality and patient safety and to create an overall culture that makes patient safety paramount.
- Sustaining a culture that encourages questions about whether the quality or patient safety commitments set forth in this Code of Conduct are being fully met and that requires individuals to raise concerns through appropriate channels until a concern or question has been addressed and resolved. Additionally, patients, TRMC Staff and physicians with a concern about the safety and quality of care provided at TRMC may report these concerns to The Joint Commission or the TRMC Patient Safety Hotline as follows:

Tillamook Regional Medical Center (TRMC)

1. Telephone at (503) 842-4444
2. By letter, addressed to:

Organizational Excellence Risk
Management Department
Tillamook Regional Medical Center
1000 Third Street
Tillamook, OR 97141

07/22/2013

The Joint Commission

1. Telephone: 800-994-6610
2. In writing:

Office of Quality Monitoring
The Joint Commission
One Renaissance Blvd.
Oakbrook Terrace, IL 60181

3. Email: complaint@jointcommission.org

3. TRMC's Patient Safety Hotline:
(503) 815-2463

4. AH Corporate Compliance Hotline:
(888) 366-3833

This commitment to quality and patient safety is an obligation of every TRMC Staff member.

Patient Rights

We ensure appropriate care for all patients. We make no distinction in the availability of services; the admission, transfer or discharge of a patient; or in the care we provide based on age, gender, disability, sexual orientation, race, color, religion, national origin, and ability to pay or type of insurance. We recognize and respect the diverse backgrounds and cultures of our patients and make every effort to equip our caregivers with the knowledge and resources to respect each patient's cultural heritage and needs. We are mindful that our community is becoming more diverse. Accordingly, we educate our staff to ensure they are equipped to meet our patient's needs in a culturally sensitive manner. We develop and implement policies and procedures to protect patient rights in the delivery of patient care. These policies and procedures are located in administrative or patient care manuals which include patient rights, informed consent, advance directives, grievance management, withholding and withdrawing of life support and pastoral counseling. We support and facilitate patients' rights to access guardianship, advocacy, conservatorship, child and/or adult protective services by providing information as requested and referrals. (See: Abuse/Neglect: Reporting and Identification of Suspected Child Abuse, Elder and/or Dependent Adult Abuse, Domestic Violence and Sexual Assault Policy). The Social Work Services Department is responsible for ensuring that the proper protective agencies are notified as required by county, state and federal laws (See: Attachments). Each patient is provided with a written statement of patient rights and a notice of privacy practices. These statements conform to all applicable state and federal laws, including but not limited to the Health Insurance Portability and Accountability act of 1996 (hereinafter referred to as HIPAA). These policies are available through TRMC intranet.

Patient Information

We are committed to ensuring confidentiality of records and related information for all patients. Consistent with HIPAA, we do not use, disclose or discuss patient-specific information, including patient financial information, with others unless it is necessary to serve the patient or required by law.

TRMC Staff must never use or disclose confidential information that violates the privacy rights of our patients. In accordance with our privacy and security policies and procedures, which reflect HIPAA requirements, no TRMC Staff has a right to any patient information other than that necessary to perform his or her job or responsibilities. Any breach of confidentiality represents a failure to meet the professional and ethical standards expected, and constitutes a violation of this Code of Conduct. A full confidentiality statement is received and accepted by each employee as part of the Employee Handbook. We also expect our vendors involved in patient care to perform and provide services

consistent with the applicable HIPAA laws. We include HIPAA Business Associate language in our agreements with these vendors.

Emergency Treatment

We follow the Emergency Medical Treatment and Active Labor Act (EMTALA) in providing an emergency medical screening examination and necessary stabilization to all patients, regardless of ability to pay. Provided we have the capacity and capability, anyone with an emergency medical condition is treated. In an emergency situation or if the patient is in labor, we will not delay the medical screening and necessary stabilization treatment in order to seek financial and demographic information. We do not admit, discharge, or transfer a patient with an emergency medical condition simply based on their ability or inability to pay or any other discriminatory factor.

A patient with an emergency medical condition is only transferred to another facility at the patient's request or if the patient's medical needs cannot be met at TRMC and appropriate care is knowingly available at another facility. Patients are only transferred in strict compliance with state and federal EMTALA regulatory and statutory requirements.

Our Responsibilities to and with our Physicians

Healthcare services like those owned and operated by TRMC are a collaboration between TRMC Staff and TRMC Medical Staff members. As in any collaboration, each party has important roles and responsibilities. TRMC is committed to providing an excellent work environment for TRMC Medical Staff. TRMC Staff interacts with TRMC Medical Staff members in a respectful and supporting way. We require TRMC Medical Staff members to be familiar with this Code of Conduct. TRMC Medical Staff are governed by Medical Staff Rules and Regulations.

a. Interactions with Physicians:

Federal and state laws and regulations govern the relationship between hospitals and physicians who may refer patients to TRMC. The applicable federal laws include the Anti-Kickback Law and the Stark Law. It is important that TRMC Staff who interact with physicians (particularly those TRMC Staff who make payments to physicians for services rendered, provide space or services to physicians, recruit physicians to the community, and/or arrange for physicians to serve in leadership positions in the organization) are aware of the requirements of the laws, regulations, and policies that address relationships between TRMC and physicians. If relationships with physicians are properly structured, but not diligently administered, such failure to administer the arrangements as agreed results in a violation of the law. Any arrangement with a physician must be structured to ensure compliance with legal requirements. Most arrangements must be in writing and approved by the Compliance Department. Failure to meet all requirements of these laws and regulations can result in serious consequences for TRMC.

b. We do not pay for referrals.

We accept patient referral and admissions based solely on the patient's medical needs and our ability to render the needed services. We do not pay or offer to pay anyone - staff, physicians, or other persons or entities - for the referral of patients.

c. We do not accept payments for referrals we make.

No TRMC Staff member or any other person acting on behalf of TRMC, is permitted to solicit or receive anything of value, directly or indirectly, in exchange for the referral of patients. Similarly, when making patient referrals to another healthcare provider, we do not take into account the volume or value of referrals that the provider has made to AH.

d. We do not Extend Business Courtesies and/or Tokens of Appreciation to Potential Referral Sources, Outside of the TRMC Policies.

Any entertainment, gift or token of appreciation involving physicians or other persons who are in a position to refer patients to TRMC must be undertaken in accordance with TRMC policies. These policies were developed to be in compliance with federal laws, regulations, and rules regarding these practices. TRMC Staff must consult TRMC policies or our Compliance Department prior to extending any business courtesy or token of appreciation to a potential referral source.

Our Responsibilities to Ensure Legal and Regulatory Compliance

TRMC provides many types of healthcare services. These services are provided pursuant to appropriate federal, state, and local laws and regulations, and federal conditions of participation. Such laws, regulations, and conditions of participation may include, but are not limited to, subjects such as certificates of need, licenses, permits, accreditations, access to treatment, consent to treatment, medical record-keeping, access to medical records and confidentiality, patients' rights, clinical research, end of life care decision making, and Medicare and Medicaid program requirements. The organization is subject to other numerous laws in addition to these healthcare laws, regulations, and the conditions of participation.

TRMC has developed policies and procedures to address many legal, accreditation, certification and regulatory requirements. However, it is impractical to develop policies and procedures that encompass the full body of applicable law, standards, conditions and regulations. Such laws, standards, conditions and regulations not covered in organizational policies and procedures must still be followed. There is a range of expertise within TRMC, including operations counsel and numerous functional experts, who should be consulted for advice concerning human resources, legal regulations and statutes, established standards and applicable conditions of participation.

Anyone aware of violations or suspected violations of laws, regulations, standards and the conditions of participation, or TRMC policies and procedures must report them immediately. There are many individuals to whom TRMC Staff may voice such concerns including supervisors, any member of the TRMC Leadership Team, the Vice President of Human Resources, the Compliance Officer, the Compliance Department, the Adventist Health Compliance Officer or Compliance hotline.

Accreditation and Surveys

From time to time, government agencies and other entities conduct surveys at TRMC. Accreditation or external agency surveys are extremely significant and broader than the scope of this Code of Conduct. In preparation for, during and after surveys, TRMC Staff must comply with all accrediting and external agency surveyors in a direct, open and honest manner and with accurate information.

In preparation for, or during a survey or inspection, TRMC Staff must never conceal, destroy, or alter any documents, lie; or make misleading statements to the agency representative. Also, TRMC Staff must never attempt to cause another staff member to fail to provide accurate information or obstruct, mislead, or delay the communication of information or records relating to a possible violation of law. No action should ever be taken, directly or indirectly, to mislead the accrediting or external agency survey teams.

Federal and State False Claims Acts

Federal and State False Claims Acts prohibit any person or entity from, among other things, knowingly presenting, or causing to be presented, a false or fraudulent claim for payment or approval, or knowingly making or using, or causing to be made or used, a false record or statement to get a false or fraudulent claim paid or approved.

The penalties for violating the Federal or State False Claims Act include:

- Civil monetary penalties of up to \$10,000 for each false claim submitted;
- Up to three times the amount of damages the government sustains because of the false claim; and,
- The costs of the legal action brought to recover for the false claim.

A private citizen may file suit under the Federal and State False Claims Acts on behalf of the government if the citizen has direct and independent knowledge of the submission of a false claim. The government will then decide whether to intervene and take over the case, dismiss or settle the case, or let the private individual pursue the case on his or her own. In either case, the person who initially filed the case may receive a portion of the amount recovered in either litigation or settlement of the claim.

Whistleblower Protections

Both the Federal and State False Claims Acts prohibit employers from retaliating or discriminating against an employee who, acting in good faith, investigates, reports or assists in uncovering a false claim or statement.

An employee who suffers discrimination or retaliation based on protected activities has the right to sue under the both the Federal and State False Claims Act. If the employee can prove that his or her employer retaliated against him or her for engaging in protected activity, the employee is entitled to be "made whole." The remedies may include:

- Reinstatement of the employee to his or her position;
- Two times the amount of back pay;
- Interest on the back pay; and,

- Compensation for any special damages (including litigation costs and reasonable attorneys' fees).

As noted above, it is the policy of Adventist Health and its Affiliates that no employee shall be punished solely on the basis that he or she reported what he or she reasonably believed to be an act of wrongdoing or a violation of the Adventist Health Corporate Compliance Program.

Your local compliance officer can provide more detailed information regarding the protections afforded employees under the Federal and State False Claims Acts.

Our Responsibilities in Safeguarding Business and Financial Information

Accuracy, Retention, and Disposal of Documents and Records

Each TRMC Staff member is responsible for the integrity and accuracy of our organization's documents and records, not only to comply with regulatory and legal requirements, but also to ensure that records are available to support our business practices and actions. No one may alter or falsify information on any record or document. Records must never be destroyed in an effort to deny governmental authorities information that may be relevant to a government investigation.

Medical and business documents and records are retained in accordance with the law and our record retention policy. Medical and business documents include paper documents such as letters and memos, computer-based information such as e-mail or computer files on disk or tape, and any other medium that contains information about the organization or its business activities. It is important to retain and destroy records only according with our policy. TRMC Staff must not tamper with records. No one may remove or destroy records prior to the specified date without first obtaining permission as outlined in the TRMC records management policy.

Coding and Billing for Services

We communicate our billing policies to all our patients prior to, or, at the time of service or admission. We bill our patients for services rendered and provide itemized bills free of charge upon request. Our patient financial services office responds to patient questions in a timely and courteous manner. We perform annual audits to ensure the accuracy of our bills. We make adjustments to correct any over or under billings.

We have implemented policies, procedures and systems to facilitate accurate billing to our government payers, commercial insurance payers, and patients. These policies, procedures, and systems conform to pertinent federal and state laws and regulations. We prohibit any TRMC Staff member from knowingly presenting or causing to be presented claims for payment or approval that are false, fictitious, or fraudulent.

In support of accurate billing, medical records must provide reliable documentation of the services we provided. It is important that all individuals who contribute to the medical record provide accurate information and do not destroy any information considered part of the official medical record. Accurate and timely documentation also depends on the

diligence and attention of physicians who treat patients in our facilities. We expect physicians to provide us with complete and accurate information in a timely manner.

Confidential Information:

The term “confidential information” refers to proprietary information about our organization’s strategies and operations as well as patient information and third party information. Improper use or disclosure of confidential information could violate legal and ethical obligations. TRMC Staff may use confidential information only to perform their job responsibilities. We do not share this information with others unless the individuals, entities, and/or contractual business relationships have a legitimate need to know. Consistent with HIPAA, we do not use, disclose or discuss patient specific information, including patient financial information, with others unless it is necessary to serve the patient or required by law. Any breach of confidentiality represents a failure to meet the professional and ethical standards expected, and constitutes a violation of this Code of Conduct. A full confidentiality statement is received and accepted by each employee as part of the TRMC Employee Handbook.

Cost Reports

We are required by federal and state laws and regulations to submit certain reports outlining our operating costs and statistics. We comply with federal and state laws, regulations, and guidelines relating to all cost reports. These laws, regulations, and guidelines define what costs are allowable and outline the appropriate methodologies we may use to claim reimbursement for the cost of services provided.

All issues related to the preparation, submission and settlement of cost reports must be performed in accordance with the Adventist Health Cost Reporting Program Policies and Procedures.

Electronic Medical and Security Requirements

All communication systems, including but not limited to computers, electronic mail, Intranet, Internet access, telephones, and voice mail, are the property of the organization and are to be used primarily for business purposes in accordance with electronic communication policies and procedures. Limited reasonable personal use of TRMC communication systems is permitted; however, users should assume these communications are not private. Users of computer and telephone systems should presume no expectation of privacy in anything they create, store, send, or receive on TRMC computer and telephone systems, and TRMC reserves the right to monitor and/or access communication usage and content consistent with our policies and procedures.

TRMC Staff who abuse our communication systems or use them excessively for non-business purposes may lose these privileges and be subject to disciplinary action.

TRMC Staff must comply with TRMC’s information security policies and standards governing the use of our information systems. User IDs and passwords are assigned to an individual. TRMC Staff are not permitted to share or disclose any password that is used to access TRMC’s systems or information.

Financial Reporting and Records

TRMC maintains a high standard of accuracy and completeness in documenting, managing, and reporting financial information. This information serves as a basis for managing our business and is important in meeting our obligations to patients, staff, suppliers, and others. It is also necessary for compliance with tax and financial reporting requirements.

All financial information must reflect actual transactions and conform to generally-accepted accounting principles. All funds or assets must be properly recorded. TRMC maintains a system of internal controls to provide reasonable assurance that all transactions are executed in accordance with management's authorization and are recorded in a proper manner to maintain accountability of the assets.

Intellectual Property Rights and Obligations

Any work of authorship, inventions, or other creation created by a staff member during the scope of his or her employment with TRMC shall be considered the property of TRMC, including any patent, trademark, copyright, trade secret or other intellectual property right.

Our Responsibilities to Our TRMC Staff

Conflict of Interest

A conflict of interest may occur if a TRMC Staff's outside activities, personal financial interest, or other private interest interfere or appear to interfere with his or her ability to make objective decisions in the course of his or her job responsibilities. Conflicts of interest also arise when a TRMC Staff member or a member of his or her family receives improper benefits as a result of his or her position in TRMC. TRMC Staff are obligated to ensure they remain free of conflicts of interest in the performance of their responsibilities at TRMC. Clinical decisions are made without regard to compensation or personal financial benefit to TRMC leaders, managers, clinical staff, or licensed independent practitioners. You are encouraged to raise any questions involving this policy with the Vice President for Human Resources or the Compliance Department before becoming engaged in outside activities or relationships that may give rise to an actual or perceived conflict.

If TRMC Staff do become involved in a transaction where personal interests conflict with TRMC's interests, they are required to disclose that conflict to a supervisor, the Human Resources Department or the Compliance Department. TRMC Board members, executives, and directors are required to sign a Conflict of Interest Statement in accordance with the TRMC Conflict of Interest Policy.

No waiver of this conflict of interest provision may be granted unless approved in advance by the Compliance Committee.

Controlled Substances/ Drug and Alcohol Free Workplace

The dangers of drug and/or alcohol abuse are numerous, including the risks of loss of life, physical damage to people and property, a decline in morale and productivity, and deterioration in the quality of goods and services produced. Our policy is to maintain a

drug/alcohol-free workplace. Thus, the unlawful manufacture, distribution, dispensing, possession or use of a controlled substance or alcohol is prohibited in our workplace. All TRMC Staff must report for work free of the influence of alcohol and illegal drugs. Any TRMC Staff member who reports to work under the influence of any illegal drug or alcohol, has an illegal drug in his or her system, or who uses, possesses, or sells illegal drugs while on TRMC work time or property may be terminated immediately. We may use drug testing as a means of enforcing this policy.

Some of our staff routinely have access to prescription drugs, controlled substances, and other medical supplies. Many of these substances are governed and monitored by specific regulatory organizations and must be administered by physician order only. Prescription and controlled medications and supplies must be handled properly and only by authorized individuals to minimize risks to TRMC and to patients. Any TRMC Staff member who becomes aware of inadequate security of drugs or controlled substances or the diversion of drugs from the organization must report it immediately.

As a condition of continued employment, TRMC Staff are expected and required to abide by this policy and to notify their department manager of any criminal drug/alcohol statute conviction against them no later than 5 calendar days after such conviction. A conviction means a finding of guilt, including a plea of nolo contendere or imposition of a sentence or both by any judicial body charged with the responsibility to determine violations of the federal or state criminal drug/ alcohol statutes.

Diversity and Equal Employment Opportunity

TRMC actively promotes diversity in its workforce at all levels of the organization. We are committed to providing an inclusive work environment where everyone is treated with fairness, dignity, and respect. We are accountable to each other for the manner in which we treat one another and for the manner in which people around us are treated. We are committed to recruiting and retaining a diverse staff that is reflective of the patients and community we serve. We regard laws, regulations and policies relating to diversity as a minimum standard. We strive to create and maintain a setting in which we celebrate cultural and other differences and consider them strengths.

TRMC maintains an equal opportunity workforce and no one shall unlawfully discriminate against any individual with regard to race, color, religion, gender, national origin, age, disability, sexual orientation, gender identity or veteran status with respect to any offer, or term or condition, of employment. We make reasonable accommodations to the known physical and mental limitation of qualified individuals with disabilities.

Harassment and Disruptive Behavior

TRMC seeks to provide a work environment that is free of all forms of discriminatory harassment, including sexual harassment and disruptive behavior. Prohibited forms of discriminatory harassment include, but are not limited to, oral, physical or visual harassment.

TRMC considers unwelcomed sexual advances, requests for sexual favors, remarks or jokes of a sexual nature, and other verbal or physical conduct of a sexual nature to constitute sexual harassment when:

- I. submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment;
- II. employment decisions concerning an individual are based on whether the person submitted to or rejected the harassing action; and/or
- III. such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment—even where it leads to no tangible or economic job consequences.

We strongly disapprove of discriminatory harassment in any form. We do not tolerate harassment by anyone based on the cultural backgrounds of those who work with us. Degrading or humiliating jokes, slurs, intimidations, or other harassing conduct is not acceptable in our workplace. Sexual harassment is considered to be sex discrimination in violation of applicable state and federal law subjecting the harassing employee to legal liability.

TRMC Staff who observe or experience any form of alleged discrimination, discriminatory harassment or violence should be reported to either a department head or the Human Resources department. The law protects TRMC Staff from any retaliation for reporting or participating in the investigation of discrimination or discriminatory harassment. A prompt and thorough investigation of the alleged incident will be conducted. To the extent possible, the investigation and any subsequent action will proceed in an atmosphere of confidentiality. We will take all appropriate steps to enforce this policy, including termination or other disciplinary action, against persons who have violated this policy. TRMC Staff who have submitted a complaint of discrimination or discriminatory harassment addressed under this policy should immediately make a further complaint if the discrimination or discriminatory harassment resumes.

Health and Safety

TRMC complies with all workplace health and safety rules and regulations. Our policies and practices are designed to protect our staff from potential workplace hazards. TRMC Staff need to be familiar with these policies and how they apply to their specific job responsibilities. Each staff member should seek advice from his or her supervisor, or the hospital's Safety Officer, whenever he/she has a question or concern. It is important that each staff member immediately advise a supervisor or the Safety Officer of any serious workplace injury or any situation presenting a danger of injury. Immediate notification allows for timely corrective actions.

Environmental Compliance

It is TRMC policy to comply with all environmental laws and regulations as they relate to TRMC's operations. We act to preserve our natural resources to the full extent reasonably possible. TRMC complies with all environmental laws and operates its facilities with the necessary permits, approvals, and controls. We diligently employ the proper procedures to provide a good environment of care and to prevent pollution.

In helping TRMC comply with these laws and regulations, all TRMC Staff must understand how job duties may impact the environment. Staff must adhere to all requirements for the proper handling of hazardous material, and immediately alert supervisors to any situation regarding the discharge of a hazardous substance, improper disposal of hazardous and medical waste, or any situation that may be potential damaging to the environment.

Hiring of Former and Current Government and Medicare Administrative Contractor Employees

The recruitment and employment of former or current U.S. government employees may be impacted by regulations concerning conflicts of interest. Hiring employees directly from a Medicare Administrative Contractor requires certain regulatory notifications. Staff should consult with the Human Resources Department or the Compliance Department regarding such recruitment and hiring.

Ineligible Persons

We do not contract with, employ, or bill for services rendered by any individual or entity: (1) that is excluded or ineligible to participate in federal healthcare programs; (2) that was suspended or debarred from federal government contracts and not reinstated in a federal healthcare program after a period of exclusion, suspension, debarment, or ineligibility; or (3) has been convicted of a criminal offense that falls within the scope of 42 U.S.C. 1320a-7(a), but has not yet been excluded, debarred, suspended or otherwise declared ineligible (each, an "Ineligible Person"). Upon hire we search the Department of Health and Human Services' Office of Inspector General, Exclusive Parties List System (EPLS) and General Services Administration's lists for such Ineligible Persons.

All TRMC Staff must disclose to TRMC any debarment, exclusion, suspension or other event that makes that person an Ineligible Person within twenty-four (24) hours of becoming aware of such event. TRMC will remove known Ineligible Persons from responsibility for, or involvement with, TRMC's business operations related to Federal health care programs and will remove them from any position for which their compensation or the items or services furnished, ordered, or prescribed by such individual are paid by a Federal health care program or with Federal funds at least until such time as such individual is reinstated into participation in the Federal health care programs.

If TRMC has actual notice that a TRMC Staff is charged with a criminal offense that falls within the scope of 42 USC § 1320a-7(a), (b)(1)-(3), or if proposed for exclusion during such individual's employment or contract term TRMC will take all appropriate actions to ensure that the responsibilities of such individual have not and shall not adversely affect the quality of care rendered to any patient or any claims submitted to a Federal health care program.

Insider Information/Confidential Information

In the course of employment with Tillamook Regional Medical Center, TRMC Staff may become aware of non-public information about TRMC that is material to the TRMC's business strategy and operations. Non-public, material information may include, among other things, plans for mergers, marketing strategy, financial results, or other business dealings. TRMC Staff may not discuss this type of information with anyone outside the organization. Within the organization, TRMC Staff should discuss this information on a strictly "need-to-know" basis and only with other TRMC Staff who require this information to perform their jobs.

License and Certification Renewals

TRMC Staff, individuals retained as independent contractors, and privileged practitioners in positions which require professional licenses, certifications, or other credentials are responsible for maintaining current credentials and shall comply at all times with federal and state requirements applicable to their respective disciplines.

TRMC does not allow any TRMC Staff member, independent contractor or privileged practitioner to work without a valid, current license or credential. Each TRMC Staff member must have evidence of current and valid license, certification, registration, accreditation or credential as required by their position description.

Copyright and Intellectual Property

TRMC respects the ownership rights of those creating physical, digital, and intellectual property. Copyright infringement is using copyrighted property without the owner's permission. This unauthorized use is also called piracy. Examples could include using unlicensed software, distributing many copies of non-public books or articles, and using business models (intellectual property) without consent or credit. TRMC Staff will not utilize copyrighted physical, digital, and intellectual property without the prior written permission of the owner.

Personal Use of TRMC Resources

Credit cards, desks, and other items provided by TRMC continue to remain organizational property, must be maintained in accordance with TRMC's policies, and used only for business purposes. TRMC reserves the right to monitor and inspect all organizational property, without notice, and without the TRMC Staff member present. TRMC may monitor and inspect organizational property even if a password or personal code has been assigned. Prior authorization must be obtained before the removal of any organizational property from the premises. All organizational property must be returned immediately upon request or termination in the same condition as when originally provided. Personal items brought onto the organization's property also are subject to inspection, without notice, and without the TRMC Staff member present.

Relationships among TRMC Staff

In the normal day-to-day functions of an organization like TRMC, there are issues that arise from how people in the organization relate to one another. It is impossible to foresee all of these issues, and many do not require explicit treatment in this Code of Conduct. While we wish to avoid any strict rules, no one should ever feel compelled to give a gift to anyone for a birthday, holiday or other celebration, and any gifts offered or received should be appropriate to the circumstances. A lavish gift to anyone in a supervisory role would clearly violate organization policy. Similarly, If TRMC agrees to support a charitable organization, no TRMC Staff member should feel compelled to contribute to the charitable organization, nor should there be any workplace consequences of such non-participation.

For reasons of supervision, safety, security and morale, family members will not be employed under the direct supervision of one another nor will they be placed in the same department, division or facility if the work involves potential conflicts of interest. For these reasons, as well to avoid misunderstandings, complaints of favoritism or possible claims of

sex discrimination or sexual harassment, managers and supervisors are prohibited from establishing, maintaining, or attempting to establish or maintain a romantic or sexual relationship with any subordinate employee within their chain of command. The term “family members” includes a TRMC Staff member’s parents, children (natural, adopted or under legal guardianship), spouse, brothers, sisters, grandparents, grandchildren, cousins, aunts, uncles, in-laws and step-relationships with all the preceding relationships. An exception to this policy is allowed only with the approval of the Vice President of Human Resources.

If co-employees become related, or if a supervisor and a subordinate attempt to or establish or maintain a romantic or sexual relationship, it should be reported promptly to the immediate supervisor of the manager or supervisor who is related or involved in the relationship. If co-employees become related, we will make reasonable efforts to assign job duties so as to minimize problems of supervision, safety, security or morale.

Relationships with Subcontractors and Suppliers

TRMC has a Code of Conduct and Business Relationship Statement that outlines its commitment to ethical and compliant behavior and its expectations of the same by its contractors. We treat our vendors fairly and maintain impartiality in our relationships. We do not allow our friendships with our vendors or others with whom we may do business in the future to affect our business decisions.

Charitable gifts or contributions from vendors are not required, and have no bearing upon their actual or potential business relationship with us. To the extent permitted under applicable laws, subsidies to underwrite the costs of medical education or professional meetings are permitted, in that they benefit patient care and community health.

TRMC Staff must manage consulting, subcontractor, and supplier relationships in a fair and reasonable manner, free from conflicts of interest and consistent with all applicable laws. TRMC promotes competitive procurement to the maximum extent practicable. TRMC’s selection of consultants, subcontractors, suppliers, and vendors will be made on the basis of objective criteria including quality, technical excellence, price, delivery, adherence to schedules, service, and maintenance of adequate sources of supply. Our purchasing decisions will be made on the supplier’s ability to meet our needs, and not on personal relationships and friendships. TRMC employs the highest ethical standards in business practices in source selection, negotiation, determination of contract awards, and the administration of all purchasing activities. TRMC complies with contractual obligations not to disclose vendor confidential information unless permitted under the contract or otherwise authorized by the vendor.

It is critical to avoid the appearance of impropriety when giving gifts to individuals who do business or are seeking to do business with TRMC. TRMC will never use gifts or other incentives to improperly influence relationships or business outcomes.

Our Responsibilities while Developing Business and Marketing Services

TRMC operates in a highly competitive environment. TRMC’s business development and marketing activities must conform to the highest standards of integrity and fairness reflected in this Code of Conduct. TRMC requires compliance with antitrust and other laws governing competitive activities.

Antitrust and Unfair Competition

TRMC restricts communication with competitors. Generally, TRMC Staff are not to discuss with competitors non-public “competitively sensitive topics.” Because the antitrust laws are so complex and their application can depend upon the conditions in local markets, it is not practical to adopt written policies to govern all situations. TRMC Staff should consult with their supervisors or the Compliance Department for guidance concerning competitive activities, laws and policies relating to their areas of responsibility.

Marketing and Advertising

Consistent with laws and regulations that governs such activities, TRMC uses marketing and advertising to educate the public, provide information to the community, increase awareness of services provided by TRMC, and for recruitment purposes. TRMC strives to present only truthful, fully informative, and non-deceptive information in these materials and announcements. TRMC will not distort the truth about services or products provided by the hospital, nor will we attack or disparage another provider, whether by name or implication, in any marketing or advertising efforts. We may feature our outstanding services or offer factual evidence of quality of care, but will not claim superiority where it cannot be substantiated.

Our Responsibilities in our Relationships with other Companies

This part of the Code of Conduct should not be considered in any way as an encouragement to make, solicit, or receive any type of entrapment or gift.

Receiving Business Courtesies

We do not expect any gifts from our vendors beyond good service. However, TRMC recognizes that there will be times when a current or potential business associate, including a potential referral source, extends an invitation to a TRMC Staff member to attend a social event, in order to further develop or provide appreciation of a current business relationship. All gifts, entertainment and business meals provided or received must be reasonable and small enough that they do not influence our decisions. We never offer or accept anything of value in exchange for referrals or other business. We let our vendors, physicians, customers and others know that our core values limit what we can receive or give. We want our services and business relationships to stand on their own.

What is a gift? It is anything of value – including traditional marketing items like t-shirts or logoed items - if the recipient receives it for free. We should recognize there is a difference between a simple pen and an expensive electronic device from a vendor.

What constitutes entertainment? This includes an invitation to events, sports activities or games or concerts where the recipient is not expected to pay for a ticket or participation fee. We should recognize there is a difference between attending a community-supported or non-profit gala and front-row seats at an expensive event.

What constitutes a business meal? This is any meal where the primary purpose of the meeting is to discuss TRMC business or quality initiatives.

If you question a gift or participation in an entertainment event, contact the Compliance Department.

Extending Business Courtesies to Non-Referral Sources

1. Meals and Entertainment. – There may be times when a TRMC Staff member wishes to extend to a current or potential business associate (other than someone who may be in a position to make a patient referral) an invitation to attend a social event (e.g., reception, meal, sporting event) to further or develop a business relationship. The purpose of the entertainment must never be to induce any favorable business action. During these events, topics of a business nature must be discussed and the host must be present.
2. Sponsoring Business Events - TRMC sponsors events for legitimate business purposes (e.g., hospital board meetings or retreats). These events may include TRMC paid meals, entertainment, transportation and lodging. However, all elements of these events, including these courtesy elements, must be consistent with the corporate policy on business events.
3. Gifts - It is critical to avoid the appearance of impropriety when giving gifts to individuals who do business or are seeking to do business with TRMC. We will never use gifts or other incentives to improperly influence relationships or business outcomes. In order to avoid embarrassment, an effort should be made to ensure that any gift we extend meets the business conduct standards of the recipient's organization. U.S. federal and state governments have strict rules and laws regarding gifts, meals and other business courtesies for their employees. TRMC does not provide any gifts, entertainment or anything else of value to any employee of the Executive Branch of the Federal Government or its fiscal intermediaries, except for minor refreshments in connection with business discussion.

Our Responsibilities in our Relationships with Government Agencies and Officials

TRMC and its representatives comply with all federal, state, and local laws governing participation in government relations and political activities. As a general policy, TRMC funds or resources will not contribute directly to individual political campaigns, political parties or other organizations that intend to use the funds primarily for political campaign objectives.

At times, TRMC may ask TRMC Staff to make personal contact with government officials or to write letters to present our positions on specific issues. In addition, it is part of the role of some TRMC management to interface on a regular basis with government officials. If a TRMC Staff member is making these communications on behalf of the organization, he/she must be certain to be familiar with any regulatory constraints and observe them. At no time may TRMC Staff speak on behalf of TRMC without first being given consent by the CEO or his/her designee. Avenues of communication may include traditional ways such as telephone and letters along with newer ways such as social media. Guidance is always available from the Compliance Department as necessary.

How We Ensure Compliance with our Code of Conduct

Program Structure

The Compliance Program is intended to demonstrate in the clearest possible terms our absolute commitment to the highest standards of conduct, ethics, and compliance. The elements of the program include setting standards, communicating those standards, providing mechanisms for reporting concerns, monitoring and auditing, program effectiveness, and maintaining an organizational structure that continues to support the Compliance Program. These elements are supported at all levels of TRMC. The Corporate Compliance Committee is responsible for providing direction, guidance and oversight to senior leadership and the Local Compliance Committee.

The TRMC Compliance Officer and the Compliance Department are responsible for the day-to-day direction, coordination and any applicable revisions or updates of the Code of Conduct and the Compliance Program. This includes developing resources (including policies and procedures, training programs, and communication tools), distributing standards, providing support (including operating the Compliance hotline, conducting program assessment, and providing advice), ensuring compliance with training requirements and otherwise administering the program.

In support of the TRMC Compliance Officer, TRMC Senior Leaders have expertise in various areas of compliance and are called upon to lead policy and training development efforts, conduct monitoring and auditing as appropriate, and provide advice. Additionally, the Vice President of Human Resources, the hospital Risk Manager, and the Accreditation Coordinator are all important resources that may be accessed to address issues arising out of this Code of Conduct.

TRMC's Compliance Officer is responsible for ensuring the functioning of the Local Compliance Committee.

Setting Standards

TRMC sets standards through this Code of Conduct, along with our associated policies and procedures and the annual or periodic (for applicable positions) compliance program training. It is the responsibility of each individual to be aware of these policies and procedures, how they pertain to his or her work, and to follow these policies and procedures.

Training and Communication

Comprehensive training and education has been developed to ensure that TRMC Staff are aware of the standards that apply to them. Code of Conduct training is conducted at the time an individual joins TRMC and annually for all TRMC Staff. Compliance training in areas of compliance risk (e.g., billing, coding, cost reports) is required of certain individuals. TRMC and Adventist Health policies outline the training requirements.

For TRMC employees, all training is recorded within our compliance education system. System administrators and the Compliance Officer can track employee compliance with their training requirements and report such information as necessary. Non-employees will receive training as required by applicable requirements or regulations.

Personal Obligation to Report

TRMC is committed to ethical and legal conduct that is compliant with all relevant laws and regulations, and to correct wrongdoing wherever it may occur at TRMC. Each TRMC Staff has an individual responsibility to report any activity by any staff, physician, subcontractor, or vendor that appears to violate applicable law, rules, regulations, accreditation standards, standards of medical practice, federal healthcare conditions of participation, or this Code of Conduct.

If any TRMC Staff member or Board member has concerns, we encourage you to report it through one of our reporting compliance program options identified below so that we may investigate and resolve the issue. However, if you believe we have left an issue unresolved, the matter can be reported to other entities such as Adventist Health, the Medical Board of California, The Joint Commission, and the Department of Public Health. There will be no retaliatory disciplinary action taken against any individual who reports concerns to any of these entities.

Resources for Guidance and Reporting Concerns

To obtain guidance on an ethics or compliance issue or to report a concern, individuals may choose from several options. We encourage the resolution of your concerns, at a local level. You may report issues to your immediate supervisor or any member of the Leadership Team. Your other reporting options include:

- Corporate Compliance Hotline (888) 366-3833
- Local Compliance Officer ext. 2263
- Patient Safety Hotline ext. 2279
- Human Resources Department ext. 2290
- Patient Privacy and Security ext. 2414
- Patient Financial Services ext. 2306

Our policies and procedures can be accessed through our Intranet.

TRMC makes every effort to maintain, within the limits of the law, the confidentiality of the identity of any individuals who report concerns or possible misconduct. TRMC does not retaliate or discipline anyone for reporting a concern in good faith. Any staff member who deliberately makes a false accusation with the purpose of harming or retaliating against another staff member is subject to discipline.

Internal Investigations of Reports

We are committed to investigating all reported concerns promptly and confidentially to the extent possible. The Compliance Officer coordinates any findings from investigations and immediately recommends corrective actions or changes that need to be made. We expect all staff to cooperate with investigation efforts.

Corrective Action

Where an internal investigation substantiates a reported violation, it is TRMC's policy to initiate a 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 in the future.

Discipline

All violators of the Code of Conduct will be subject to disciplinary action in accordance with the TRMC Employee Handbook. Discipline of TRMC Staff may include:

- Counseling;
- Verbal warning;
- Written warning;
- Final written warning;
- Termination; or
- Other actions as determined by TRMC management.

TRMC contractors and sub-contractors are subject to possible contract termination.

Measuring Program Effectiveness

We are committed to assessing the effectiveness of our Compliance Program through various efforts. Much of this effort is provided by the Adventist Health Corporate Compliance Department, which routinely conducts audits of issues that have regulatory or compliance implications. Responsible executives routinely undertake monitoring efforts in support of policies and compliance in their areas of responsibility.

Review:

This Code of Conduct is reviewed at least every two years and revised as necessary in response to issues which arise in the health-care industry, changes in accreditation, legal and/or regulatory requirements, and recommendations, which may arise from resolution of ethical issues.

Acknowledgment Process:

TRMC requires all affected individuals to sign an acknowledgement confirming they have reviewed the Code of Conduct and understand that it represents the mandatory policies of TRMC. This acknowledgment is a condition of employment or contract relationship. Affected and appropriate TRMC Staff will be required to participate in their applicable, periodic training sessions.

Each TRMC Staff member is also required to participate in annual Code of Conduct training and records of such training must be retained by TRMC. Adherence to and support of TRMC's Code of Conduct and participation in related activities and training is considered in decisions regarding hiring, promotion, performance review and

compensation for all candidates and staff members. New TRMC Staff members must receive Compliance Program and Code of Conduct training within 90 days of employment.

Related Policies and Procedures:

The following related policies and procedures provide further and specific guidance for conduct at TRMC.

- Mission and Vision Statement
- Guiding Principles
- AH Compliance Program
- Strategic Plan or Core Quality Strategies
- Criteria for Admission to Patient Settings
- Discharge Planning
- Patient Rights and Responsibilities
- Informed Consent Policies
- Fair Billing Practices
- Harassment Policy
- Conflict of Interest Statement
- Admission Practices
- Do Not Resuscitate/Withholding and Withdrawal
- Dependent Adult/Elder Abuse Reporting
- Child Abuse Reporting
- Level of Care Policy
- Organ and Tissue Donation
- Research Studies on Patients
- Transfer of a Patient to Another Facility
- Statement on Ethics by Marketing
- Employee Handbook
- Translation Services
- Chain of Command
- Ethical Issues/Conflict Resolution
- Workplace Relationships
- Performance Issues
- Drug and Alcohol-Free Workplace
- Sexual Harassment
- Human Resource Records and Privacy
- Non Solicitation
- Non-Monetary Compensation
- Social Networking and Media
- Handling Patient Complaints
- Faculty/Hospital Responsibility for Student Clinical

ACKNOWLEDGEMENT

I, _____, hereby acknowledge the receipt of the "Code of Conduct." I realize that the Code of Conduct contains many of the policies, procedures, rules and regulations ("Policies") to which I am subject. I further acknowledge that this Code of Conduct supersedes and replaces any inconsistent Policies and all prior Codes of Conduct. I also understand that it is the intent of the Code of Conduct to inform me of the policies I am subject to and that it is not a complete manual. Except as provided in this Acknowledgement, I realize the Policies may change from time to time.

Failure to comply with this Code of Conduct may result in disciplinary action.

Date: _____

Signature: _____

Name (Please Print):

Relationship: (check all that apply)

- TRMC Employee
- Board Member
- Contractor / Subcontractor
- Other: _____

MEDICAL STAFF ACKNOWLEDGEMENT

I hereby acknowledge receipt of TRMC's Code of Conduct and agree that I have been given ample opportunity to read, review and understand the Code. With respect to my business dealings with Hospital and my performance of services as a medical staff member, I shall not act in any manner which conflicts with or violates the Code, and shall not cause another person to act in any manner which conflicts with or violates the Code. I will comply with the Code as it relates to my business relationships with Hospital or any Adventist Health affiliates, subsidiaries, employees, agents, servants, officers, directors, contractors and suppliers of every kind.

I am aware that as a member of the Medical Staff, I am governed by the Medical Staff Bylaws, Rules and Regulations which govern any potential discipline that may arise with respect to the AH Code of Conduct.

Date: _____

Signature: _____

Name (Please Print):