

Pioneer Health Services

Code of Conduct

Introduction

It is the policy of Pioneer Health Services that all employees and affiliated professional staff will comply fully with all state and federal laws and will conduct themselves in accord with company policies and the highest ethical standards.

To help achieve that end, Pioneer has created a Code of Conduct that describes Pioneer policies concerning certain laws and regulations affecting many of our business operations. Pioneer has established this Code of Conduct to help its employees understand some of the specific laws and policies they are bound to obey.

Pioneer policy is to provide quality services to patients, their families and all business partners at the highest professional, ethical and legal standards. Employees that fail to do so will be subject to discipline up to and including termination of employment. Any person who learns of or suspects that someone has violated a state or federal law, this Code of Conduct, or has acted unethically or improperly, must report that information to their supervisor, an HR representative or the Corporate Compliance Office. Supervisors are required to ensure compliance by their staff.

If you are uncomfortable discussing your concerns with a supervisor or feel those concerns are being ignored, you are encouraged to call your Human Resource representative or Corporate Compliance Office to report your concern and seek resolutions. You may also call the Pioneer Compliance Hotline to report information about unethical or illegal conduct, violations of Pioneer Code of Conduct or the Corporate Compliance Program. The Pioneer Compliance Hotline allows anonymous reporting of actual or perceived violations. You do not have to leave your name, although you may if you wish. The Pioneer Compliance Hot Line number is 877-874-8416. Your telephone number will not be identified in any message. You may also contact the Compliance Hotline online at www.pioneer.silentwhistle.com.

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Confidentiality

All patient information (including medical records) must be kept strictly confidential and not released to anyone outside the provider without written patient consent or lawful court order. Consistent with HIPAA Privacy Rule, employees are prohibited from disclosing patient health information to anyone other than the patient, or for treatment, payment or healthcare operations, or with authorization from the patient. Internal access by Pioneer employees to patient medical records or other protected information is not permitted unless there is a legitimate, work-related need to see the information.

Discrimination

It is against the law to discriminate against an employee or patient on the basis of race, color, sex, age, national origin or other protected status. Patients also cannot be discriminated against because of their ability to pay for care. Any person with information that a provider or individual is improperly discriminating or being discriminated against must report that information.

Financial and Business Reporting

Pioneer provides various financial and business reporting processes to ensure accurate and timely recordkeeping for internal transactions, government and client reports. These can include but are not limited to employee time and expense reports, internal financial and activity reports, audits, insurance claims reports and performance reports for clients. All reporting processes must be complete and accurate. Employees who intentionally misrepresent or falsify required information on company documents will be subject to disciplinary action up to and including termination of employment. Employees who suspect misrepresentation or false reporting are required to notify their manager, the Human Resource Manager or the Compliance Manager immediately. Failure to do so may result in disciplinary action up to and including termination of employment.

Conflicts of Interest

All Pioneer employees must avoid conflicts of interest and situations that even look like a conflict of interest. This means that employees will not personally benefit from doing business with Pioneer nor have independent formal or informal business relationships with those who deal with Pioneer. They can not use company property for personal benefit without the expressed approval of their supervisor. Pioneer employees can not compete with Pioneer. Any potential for conflict of interest should be disclosed to your supervisor. You must also inform your supervisor if, within a year of your employment, you worked for a Medicare intermediary or carrier.

Record Retention

State and federal laws require that providers and others within Pioneer keep certain records for specified periods of time. It is our policy to keep records for as long as the law requires. The legal requirements are many and varied, so before you discard any documentation, it is wise to check with your supervisor, medical records or the Corporate Compliance Office regarding any requirements that might exist. All employees should learn and follow existing record retention policies.

Cooperation with Law Enforcement

Federal and State agencies, as well as Medicare carriers and intermediaries, have broad rights to investigate matters involving patient care and billing. Pioneer policy is to cooperate with enforcement investigations and activities within the bounds permitted by law. Anyone who is contacted, orally or in writing, at home or at work, by a person stating that he or she is investigating on behalf of the government or an insurer, must refer that person to the Corporate Compliance Office. If you are presented with a subpoena, warrant, or court order you have the

right to an attorney when speaking with the government agent. The Corporate Compliance Office will coordinate the disclosure of documentation. Any person who elects to speak with a law enforcement officer must tell the complete truth.

Payments, Discounts, Gifts and Kickbacks

It is generally illegal to pay for patient referrals or to pay for a recommendation that someone lease or buy something (like equipment, drugs or services) from you, if a government health program (like Medicare) is paying for the patient services or item. It is Pioneer policy not to pay for referrals or recommendations or to accept payment for referrals we make. "Payment" does not have to be cash; it can be anything of value, like a discount or a free service or piece of equipment. Employees must avoid entertaining or giving gifts or gratuities of more than nominal value to those who can refer patients or business to a Pioneer healthcare facility, provider or other business unit. Additionally, employees are prohibited from accepting or soliciting gifts or gratuities of any kind as an incentive or reward for conducting business at any Pioneer facility or business unit.

Billing

It is against federal law (False Claim Act) and Pioneer policy to knowingly submit or cause to submit false claims for payment. This requirement applies to all employees and affiliated professional staff at our healthcare facilities, employees in our billing and collections department, accounting department and any other employees who create and submit bills for payment. Submitting a false claim might include intentionally using the wrong billing codes, falsifying the medical record, or billing for services not provided or not medically necessary. According to the False Claim Act violations can be punished by fines (up to \$11,000 per claim), imprisonment and exclusion from the Medicare or Medicaid programs. Pioneer policy is to bill accurately and only for medically necessary services that are provided and documented, and for goods and services actually performed. Any subcontractors that perform billing services for Pioneer must ensure compliance with these billing requirements.

The False Claim Act includes a "whistleblower" provision which allows any person with actual knowledge of allegedly false claims to file a lawsuit on behalf of the U.S. Government. The whistleblower is protected under this law from retaliation.

It is the responsibility of every employee to prevent fraud, waste, and abuse. Fraud is the intentional and false statement or claim made to obtain some benefit to which one is not entitled. Abuse is a practice or incident that is inconsistent with sound medical practice and may result in failure to meet recognized standards of care or improper payment. Violating these policies or failing to report violations could subject an employee to disciplinary action, up to and including termination of employment.

Referrals & Physician Recruitment

It is generally against the law for a doctor to refer patients to providers (such as labs) in which he or she (or a family member) has a financial interest or relationship. An example might be a physician referring

patients to a lab that he or she owns. Violations can result in fines and exclusion from Medicare or Medicaid. The law is complex and applies only to certain services and has many exceptions. If you suspect that a physician is referring patients illegally, it is best to report to your supervisor or the Compliance Representative. Pioneer sometimes recruits physicians to become part of its rural healthcare systems. It is our policy to comply with the Stark Law, to pay fair market value compensation to recruit and retain physicians and not to offer physicians anything of value in exchange for referrals to Pioneer healthcare facilities.

Patient Transfers

Federal law requires that an emergency department not transfer a patient who needs emergency treatment (including psychiatric) unless the patient is stable. A Pioneer Hospital Emergency Department cannot refuse or delay treatment on the basis of the patient's insurance or ability to pay. Transfers can only be done with appropriate medical personnel approval if the medical benefits of transfer outweigh risk to the patient.

Discussions with Competitors

The antitrust laws prohibit competitors from agreeing on prices or rates. More specifically, it is illegal and against Pioneer policy to discuss services, rates, or proposals with competitors. Any questions about whether it is legal to share business information (prices, contract terms, salaries, etc.) with competitors should be raised with the Compliance Representative or your supervisor. Penalties for antitrust violations are substantial and can involve fines and imprisonment.

Waste Disposal

Pioneer facilities must comply with various environmental laws in the way they dispose of medical waste and other hazardous materials. Individuals must learn and follow their facilities' waste disposal policies. Spills or releases must be reported promptly.

Controlled Substances

Federal and state laws regulate the handling and dispensing of controlled substances, including narcotics. Pioneer will not tolerate unauthorized manufacture, distribution or possession of controlled substances. Anyone having information about a violation of this policy or the law must report it promptly, or they may be subject to discipline.

Nursing Homes

The nursing homes and senior care facilities within Pioneer must comply with all state and federal requirements relating to the operation of the facility and treatment of patients. Pioneer policy is to comply with such requirements. Anyone who suspects that a nursing home or Pioneer employee is violating governmental standards, abusing or neglecting patients or allowing that to happen, is required by law to report such concerns to a supervisor or their Compliance Representative.

Use of Company Assets

Pioneer provides employees with the assets, tools and other resources necessary to achieve company business goals and objectives. These may include, but are not limited to, office and cellular telephones, computers, pagers, email and internet systems, photocopiers, fax machines, postage meters, vehicles and other equipment specific to individual jobs or functions. Assets also include confidential and proprietary information, goodwill and company financial and business strategic information. Pioneer expects that all employees will use these assets solely for the benefit of the company and will not use them in any way that interferes with business processes, inconveniences others, harms the company in any way or creates waste.

Individual Responsibility

Each employee is personally responsible to act in accordance with the policies of Pioneer Health Services as set forth in this Code of Conduct and all other employment policies. Violating these policies or failing to report violations could subject an employee to disciplinary action, up to and including termination of employment. Pioneer uses a progressive disciplinary process to correct job performance and work habit problems in the work place. Our objective is to eliminate the unacceptable behaviors and provide guidance for improvement. Penalties may vary based on the frequency and severity of the policy violation or work place misconduct.

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