

INTRODUCTION AND PURPOSE

Each practitioner and allied health professional at a USPI facility and in their practice is committed to acting in accordance with the highest standards of ethics in business, complying with law and operating in an environment that promotes a culture of safety for patients, practitioners, allied health professionals, employees and others. This Code of Conduct defines the conduct that is expected of all practitioners and allied health professionals and helps to ensure that they and the facility remain in full compliance with all applicable laws and standards of propriety.

LEGAL OBLIGATIONS AND BILLING

All practitioners and allied health professionals will conduct their actions in compliance with applicable laws, regulations, Medical Staff Bylaws/Rules and Regulations and facility policies. In particular, no one will solicit or receive, or offer to pay or pay, anything of value in return for referring or recommending the referral of an individual for medical services or unnecessary procedures. This includes, among other matters, arrangements with surgical device manufactures and other vendors that encourage the overutilization of surgical hardware or certain types of procedures. Furthermore, no one will provide inducements for patients to access services payable by government health care programs, including providing free transportation to such patients or waiving their copayments or other financial responsibilities.

All practitioners, allied health professionals and the facility are committed to billing accurately for services. It is imperative that billing statements to patients and payors accurately reflect the services actually provided, who performed the services and the precise charge for those services, as well as other relevant data relating to the patient. Practitioners and allied health professionals will provide complete and accurate documentation to the best of their abilities in order to submit claims for payment and reimbursement according to applicable laws and regulations. No practitioner or allied health professional will knowingly submit a claim they know to be false, fraudulent or fictitious or request reimbursement for services that are not medically necessary.

BUSINESS CONDUCT AND APPROPRIATE TREATMENT

Each practitioner, allied health professional and the facility is committed to ensuring the safety of their patients, practitioners, allied health professionals and others. Each individual should always conduct themselves in a manner that promotes safety and, if at the facility, immediately notify the Administrator/CEO of any activity that endangers a patient, practitioner, allied health professional or other individual. Practitioners and allied health professionals will promptly report any accidents or "near misses" involving injury to a patient, visitor or employee at the facility. Individuals will also report all accidents involving medical waste or hazardous materials at the facility and take immediate action to help prevent harm.

Practitioners, allied health professionals and the facility intend to provide a work environment that is pleasant, healthful and free from discrimination, harassment, intimidation and other disruptive or inappropriate behavior. Appropriate conduct expected of each individual includes, but is not limited to, complying with law, this Code of Conduct and the policies and procedures of the facility and their practices, treating others with respect and dignity and addressing concerns with others privately and in an appropriate manner. Appropriate conduct fosters a culture of safety and the delivery of quality patient care.

Disruptive or inappropriate conduct, including discrimination, harassment or intimidation, contributes to poor patient satisfaction and potential adverse outcomes, increases the cost of delivering care and creates an unproductive work environment. Disruptive and inappropriate conduct includes any manner of interaction with others that interferes with patient care or has a negative effect on workplace morale. Such conduct includes, but is not limited to, overt actions such as verbal outbursts and physical threats and passive behaviors such as refusing to perform assigned tasks or answer questions or using condescending language. Prohibited conduct also includes harassment, intimidation or discrimination based on age, race, gender, color, religion, national origin, disability, marital status, sexual orientation, status with respect to public assistance and other characteristics protected under state, federal or local law (each, an "illicit reason"). Without limiting the foregoing, all personnel decisions at the facility, such as initial hire, training, promotion, compensation, benefits, transfers, layoffs, returns from layoff, education, tuition assistance, social and recreation programs, service to the facility's patients and visitors and dealings with vendors will be administered without regard to any illicit reason.

Sexual harassment, one type of prohibited harassment, is defined as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when (a) submission to such conduct is made a term or condition, either explicitly or implicitly, of an individual's employment, (b) submission to or rejection of such conduct by an individual is used as a factor in decisions affecting that individual's employment and (c) such conduct has the purpose or effect of substantially interfering with an individual's work performance or creates an intimidating, hostile or offensive work environment. Sexual harassment is prohibited at the facility and in each practitioner's and allied health professional's practice.