Code of Conduct

CORPORATE COMPLIANCE AND INTERNAL AUDIT

ORLANDO REGIONAL HEALTHCARE
Dear Orlando Regional Family:

Orlando Regional Healthcare is a regional healthcare delivery system offering a wide-range of sophisticated healthcare services to the residents of Central Florida. Our mission is a pledge to offer quality-oriented and cost efficient healthcare that will improve the health and quality of life for the people and communities we serve. Orlando Regional and its healthcare facilities and affiliates have a reputation, achieved and maintained through the integrity and ethical standards of our officers and team members. We live in a world of constantly changing regulations and requirements. We are committed to adhere to these laws, government regulations, third party payor agreements, and our own policies and procedures and have implemented a Corporate Compliance Program to assist us all in this process.

A key element of the Corporate Compliance Program is our Code of Conduct. Our Code of Conduct is rooted in our mission and values, and re-affirms the values and professional standards that already exist among all who are associated with Orlando Regional. Quality, honesty, and integrity in everything we do are important values to all of us.

Many of the topics included in the Code of Conduct are common sense. We are committed to doing things the right way, every time. It is about treating each other and the patients we serve with dignity and respect.

Please take time to read the Code of Conduct and become familiar with its contents and keep a copy handy for quick reference. If you ever have a question that is unclear or not answered within the Code of Conduct, be sure to ask your supervisor or the Corporate Compliance Officer.

The Board of Directors and management team of Orlando Regional join me in pledging our full commitment to upholding our Code of Conduct and our Corporate Compliance Program as we fulfill our mission of healthcare excellence. Thank you for your continued dedication to making Orlando Regional an organization of which we can all be proud.

Sincerely,

John Hillenmeyer
President and Chief Executive Officer
OUR MISSION
To improve the health and quality of life of the individuals and communities we serve.

OUR VALUES

People
We are committed to excellence in serving and supporting our patients our physicians, our guests and fellow team members.

We not only care for people, we care about them.

We will do everything in our power to ensure that all people are treated with respect, dignity, kindness and compassion.

We will listen intently to our customers and each other with open minds and with open hearts.

We will make a positive difference in the lives of the people we serve.

Quality
We will never compromise on quality.

Our team will provide the highest quality of care and service in everything we do.

We will take responsibility for conserving time, money and resources.

We will be creative and versatile as a team in our solutions.

Community
We are proud to serve the people of this community.

We will never lose sight of the fact that we are a community-owned organization.

We will demonstrate, in our words and actions, the highest level of commitment to each community we serve.
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As one of Central Florida’s premier medical providers, Orlando Regional Healthcare recognizes that fostering an atmosphere of integrity, honesty and morality is of utmost importance. Achieving our mission to improve the health and quality of life of the individuals and communities we serve, and our vision of everyone working together as a team to provide the best quality, comfort and service to our patients and guests in a genuine, caring environment depend on it.

We also recognize that we must act in accordance with our Code of Conduct, policies, procedures, laws, and regulations. We are aware that failure to do so can result in serious consequences for individual team members, medical staff members, as well as Orlando Regional. Each employee has an affirmative duty to report a compliance issue and failure to do so could result in discharge. Our Code of Conduct and our Corporate Compliance Program apply to all Orlando Regional team members, as well as board members, providers, volunteers, students, and other individuals authorized to act as representatives of Orlando Regional. Further, all applicable sections of this Code of Conduct shall apply to vendor representatives and independent contractors while carrying out their duties at or for Orlando Regional.

The purpose of the Code of Conduct is to assist our team members in maintaining high ethical standards of the corporation in all its business dealings. It will help guide you in making decisions that conform to the ethical and legal standards expected of you. While our Code of Conduct is designed to provide overall guidance, it does not address every situation. More specific guidance is provided in Orlando Regional’s Policies and Procedures and the Team Member Handbook.

If there is no specific policy, our Code of Conduct becomes the policy. If a policy and our Code of Conduct conflict, the Code of Conduct becomes the policy. The Code of Conduct is a “living document” that will be updated periodically to respond to changing conditions. Questions regarding our Code of Conduct, or any issue, should first be raised by the team member to his or her immediate supervisor, then through the chain of authority up to and including the Corporate Compliance Officer. Issues can also be reported confidentially and anonymously to the Compliance Hotline.

The Code of Conduct is not an employment contract, nor is it intended to give any expressed or implied rights of continued employment. Conduct contrary to the Code of Conduct will result in an investigation and possible disciplinary action up to and including discharge.

The term “we,” as used in this document, is meant to refer collectively to Orlando Regional’s team members, board members, providers, volunteers, students, and other individuals that are authorized to act as representatives of Orlando Regional, both inside and outside Orlando Regional facilities.
CORPORATE COMPLIANCE PROGRAM

The Corporate Compliance Program at Orlando Regional exists to assist us with complying with federal and state statutes, regulations and guidelines that affect this organization. The program is designed to support team members and others by educating the organization on these requirements as well as being a resource to consult and interpret corporate policy and legal matters. Our department stays abreast of current healthcare trends and information to better forecast the evolving compliance needs of Orlando Regional.

The Corporate Compliance Team includes professionals who are well-trained and certified in healthcare compliance. These individuals are professionals who have many years of experience in a broad range of disciplines that include: accounting, auditing, compliance, education, healthcare, information technology, law, management, nursing, training and development, and a mixture of hospital corporate areas. The Corporate Compliance Team ensures that we are providing excellent patient care to the communities we serve in accordance with the laws and regulations that guide our standards of practice.

THE THREE STEP COMMUNICATION PROCESS

Maintaining the ethical standards of Orlando Regional is the responsibility of each team member. If you become aware of or suspect a situation that might jeopardize the ethical integrity of our company, it is your obligation to report the circumstances.

The Three Step Compliance Communication Process was developed to assist you with our responsibility to report possible violations of laws, policies, or the Code of Conduct and is outlined as follows:

1. Talk to your immediate supervisor
2. Talk to the manager or director over your area
3. Call the confidential Compliance Hotline

For more information about our Three Step Compliance Communication Process please see page 6.
COMPLIANCE HOTLINE

What is The Compliance Hotline?
Orlando Regional’s Compliance Hotline is a simple, confidential, risk-free way for you to report activities that may involve ethical violations or criminal conduct. The Compliance Hotline is available 24 hours per day, 7 days a week and is managed and operated by an independent communications firm hired by Orlando Regional to ensure the integrity and objectivity of compliance reporting.

Why is The Compliance Hotline Important?
Orlando Regional is committed to conducting business in compliance with all applicable laws. The Compliance Hotline – with the support of all team members – is an effective way to report activities that may be in violation of the law.

What should I report to The Compliance Hotline?
Call the Orlando Regional Compliance Hotline to report violations related to:
- Patient rights
- Professional standards of practice
- Medicare/Medicaid Fraud and Abuse
- Fraudulent billing
- Professional and business ethics
- Bribes
- Kickbacks
- Confidentiality
- Conflicts of interest

What should be my first step?
First report your concerns to your supervisor, or to another member of management. If you suspect your supervisor is involved, or your previous reports have not been acted upon, call the Compliance Hotline.

What happens when I make a call?
Your call to the Orlando Regional Compliance Hotline is answered by an independent, third-party communications specialist. This specialist will document the information you provide and generate a written report that will be forwarded to the Corporate Compliance Officer of Orlando Regional. After review by the Corporate Compliance Officer, the report will be assigned to the appropriate department to initiate an inquiry. The results of each call will be reported back to the communications specialist.

To protect everyone involved, no disciplinary or legal action will be taken based only on Compliance Hotline calls. Only substantiated findings will result in action.
Do I have to give my name?
No. You are not required to identify yourself and calls are not recorded. At the close of your call, the communications specialist will assign you a special coded number you can refer to during any follow up calls.

What if I don’t have all of the facts?
Call the Compliance Hotline even if you’re not sure there is a problem. Orlando Regional’s Corporate Compliance Officer will look into the information you do provide, attempt to verify it, and take appropriate action.

Compliance Hotline reports can be made two ways:
Via telephone by calling 888 464-6747 or by writing to:

Corporate Compliance Officer
Corporate Compliance and Internal Audit
Orlando Regional Healthcare
1414 Kuhl Avenue, MP 29
Orlando, FL 32806

CONTACT NUMBERS

<table>
<thead>
<tr>
<th>Corporate Compliance Department</th>
<th>321 841-2335</th>
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<tr>
<td>Corporate Compliance Officer</td>
<td>321 841-2664</td>
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<tr>
<td>Compliance Hotline</td>
<td>888 464-6747</td>
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<tr>
<td>HIPAA Hotline</td>
<td>321 843-3333</td>
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<tr>
<td>Risk Management</td>
<td>321 841-5294</td>
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<tr>
<td>Media Relations</td>
<td>321 841-7830</td>
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Government regulation of the healthcare industry is increasingly complex. At the same time, federal and state governments have made healthcare fraud and abuse a top law-enforcement priority. Orlando Regional takes its responsibility to comply with the law very seriously and has taken steps to prevent, detect, and correct legal violations. The following standards are neither exclusive nor complete. We are required to comply with all applicable laws, whether or not they are specifically addressed in this Code of Conduct or in policies and procedures. If you have any questions regarding the existence, interpretation, or application of any law, you should contact the Corporate Compliance Office.

**Anti-Trust**

Anti-Trust laws are designed to create a level playing field in the marketplace and to promote fair competition. We shall comply with applicable antitrust and similar laws that regulate competition. There shall be no discussions or agreements with competitors regarding price or other terms for product sales, prices paid to suppliers or providers, dividing up customers or geographic markets, or joint action to boycott or coerce certain customers, suppliers, or providers.

We are involved in numerous trade and professional associations. It is not atypical to learn information about other organizations, including competitors, through legal and ethical means. These affiliations promote a sharing of information but it is not always appropriate to share business information to these associations and their members. We will take care to safeguard any proprietary business data.

Marketing and advertising activities designed to provide information to the community, increase awareness of our services or to educate the public may be used. All communications, both oral and written, are to be presented in a truthful, fully informative, and non-deceptive manner.

Orlando Regional’s credentialing and peer review activities may carry antitrust implications. It is appropriate for physicians to review the work of their peers. Because the physicians reviewing a particular physician may, by virtue of their medical specialties, be the physician’s competitors, special care must be taken to ensure that free and open competition is maintained. As a result, credentialing, peer review, and physician discipline at Orlando Regional is conducted only through properly constituted committees. Physicians participating in these activities are expected to use objective medical judgment.

We are expected to seek advice from the Corporate Compliance Office when confronted with business decisions involving a risk of violation of the antitrust laws.

**Tax**

Orlando Regional is organized and operated exclusively for charitable purposes to serve the healthcare needs of the community, and therefore it is exempt from the payment of federal income tax. All of its assets are used exclusively to further Orlando Regional’s charitable purposes. Such assets may not be used to benefit any individual or person who is in a position to exercise influence over the business concerns of Orlando Regional. Moreover, Orlando Regional may not allow net earnings to benefit insiders of the organization, nor may Orlando Regional take part in any activities that result in excess financial benefits to any private individual. As a tax-exempt organization, we avoid compensation arrangements in excess of fair market value, accurately report payments to appropriate taxing authorities, and file all tax and information returns consistent with applicable laws.
Fraud and Abuse

Orlando Regional has adopted policies to prevent and detect fraud, waste and abuse. They require compliance with federal and state laws intended to protect against fraud, waste and abuse. Our policies are readily available upon request and on SWIFT.

Our policies and various federal and state laws, such as the federal False Claims Act and the Florida False Claims Act prohibit false claims and other fraudulent activity. Violations of these laws can result in civil actions and penalties. For example, the federal False Claims Act prohibits conduct such as knowingly submitting a false or fraudulent claim, or using or making a false statement, to get a false or fraudulent claim paid or approved by the United States. It also prohibits any plan to defraud the United States by getting a false claim allowed or paid. Also, the Florida False Claims Act prohibits knowingly causing the Florida government to pay claims that are false. Other laws governing Medicare/Medicaid program integrity also look for ways to reduce fraud and abuse.

While not an exhaustive list, the following are examples of fraud, waste or abuse:

- False documentation of a diagnosis or procedure code to obtain a higher rate of reimbursement
- Forging or changing patient billing-related items such as making false claims, or billing for services or supplies not rendered, not medically necessary or not documented
- Misrepresenting a diagnosis or procedure code in order to obtain payment
- Alteration or forgery of checks
- Any misuse or theft of funds
- Any irregularity in the handling or reporting of financial transactions
- Any irregularities of or giving or receiving payment in connection with business transactions and the giving or obtaining of contracts
- Falsifying or altering any record or report, such as an employment application, payroll or time record, expense account, medical record, patient record, or scientific research or data collection record
- Theft or unauthorized use of furniture, fixtures, equipment, supplies, software, or other property
- Misleading or falsely reporting financial or operation records or books
- Falsely reporting costs

Performing routine audits, monitoring, and reviews along with internal controls helps us prevent and detect fraud, waste and abuse. Please do not ignore these types of activities. If you know or suspect activity of this nature, report it immediately. If you are uncertain as to whether an activity is fraudulent, contact the Corporate Compliance Officer for guidance.

Individuals who lawfully report false claims or other fraudulent conduct or who otherwise assist in an investigation, action or testimony is protected from retaliation under both federal and state laws. We will not discriminate or retaliate against any whistleblower that files, in good faith, a civil action for false claims or participates in an investigation of Orlando Regional.
Coding and Billing

At Orlando Regional, policies, procedures, and systems have been put in place to assist accurate billing to government payors, commercial insurance payors, and patients. We ensure that coding and billing are performed accurately, in accordance with nationally recognized standards and rules. It is the providers’ responsibility to ensure that the information required for proper coding is documented in the patients’ medical record and on the encounter forms and that both accurately reflect the care provided.

Accurate and timely documentation also depends on the diligence and attention of physicians who treat patients in our facilities. We do not destroy any information considered part of the official medical record.

We ensure that all payments and other transactions are properly authorized by management and properly documented. Payors should be notified of payment errors and refunds processed promptly and accurately.

Political Activity and Lobbying

Orlando Regional believes that our democratic form of government benefits from citizens who are politically active. For this reason, we are encouraged to participate in personal civic and political activities on our own time and at our own expense. While doing so, it is important not to give the impression that we are speaking on behalf of or representing Orlando Regional.

Orlando Regional’s own political activities are, however, limited by law. We cannot use organization funds or resources to contribute to political campaigns or for gifts or payments to any political candidate, political party or any affiliated organization. We cannot be required to make any contribution or ask for reimbursement for any contribution made to political candidates or campaigns.

Copyrights

We follow the laws regarding intellectual properties, including patents, trademarks, marketing, copyrights, and software. We may not make, acquire, or use unauthorized copies of computer software unless it is specifically allowed in the license agreement.

Orlando Regional purchases and subscribes to a variety of printed and online publications. We follow all copyright laws of the United States, even if the work does not carry the copyright symbol. These laws prohibit the reproduction or copying of the publication without permission from the author. Orlando Regional has a license with the Copyright Clearance Center that allows us to lawfully use copyright-protected content registered on their website within the organization. Before distributing a document internally, we will ensure inclusion on the Copyright Clearance Center catalog. We do not reproduce documents for distribution outside Orlando Regional, unless we are the author or have documented permission from the author.
Research Activity

Orlando Regional receives federal funds and grants to conduct scientific research and we follow federal regulations imposed as a condition to receiving those funds. These regulations prohibit “misconduct in science,” which includes intentional fabrication, falsification, or plagiarism in proposing, conducting, or reporting research. Any research errors or conflicts will be promptly reported and resolved.

We protect the patients and respect their rights during research, investigations, and clinical trials. We do not engage in human subject research without the approval of the applicable Orlando Regional Institutional Review Board (IRB). We follow all Orlando Regional polices and procedures regarding human subject research and IRB’s. We ensure fair and equal access to research protocols without discrimination while protecting the individual’s right to refuse, agree to, or withdraw from participation in a study.

We do not bill the patient or third party payor for the costs of research-related tests, procedures and treatments, which are paid by a study sponsor. Any billing errors will be promptly corrected and any duplicate payments refunded.

Environmental

Orlando Regional is committed to providing a safe and secure environment for patients, family members, team members, providers, visitors and customers. We comply with established safety and infection control laws and regulations, which are intended to prevent job-related hazards. We are consistent with ergonomic standards and maintain a safe work environment.

We are respectful of the environment and conserve natural resources. We exercise our policies and procedures with regard to the environmental aspects of the use of Orlando Regional buildings, property, laboratory processes and medical products in accordance with federal, state and accreditation standards. We comply with permit requirements that allow for the safe discharge of pollutants into the air, sewage systems, water or land and comply with all laws and regulations governing the handling, storage, use, and disposal of hazardous materials, other pollutants, and infectious wastes.

Workplace Conduct and Employment Practices

Orlando Regional provides equal employment opportunities to prospective and current team members, based solely on merit, qualifications and abilities. We show respect and do not discriminate in employment opportunities or practices on the basis of race, color, religion, sex, national origin, ancestry, age, physical or mental disability, sexual orientation, veteran status or any other status protected by law.

We support and observe a workplace free of alcohol, drugs and smoking.

Orlando Regional fosters an environment free of any type of harassment, derogatory comments and disruptive behavior. All types of harassing behavior are prohibited. We do not make offensive comments, jokes, indirect suggestions or sexually oriented statements. Unwanted sexual advances, requests for sexual favors, and all other verbal or physical conduct of a sexual nature are prohibited.
Any behavior that interferes with a team member’s work performance or creates an intimidating, hostile or offensive work environment will not be tolerated at Orlando Regional. Management is responsible for preventing discrimination and harassment of any kind. Everyone is responsible for respecting the rights of their fellow team members and for reporting inappropriate behavior to the appropriate parties.

Screening of Team Members and Vendors

We do not knowingly contract with, employ, or bill for services rendered by an individual or entity that is excluded or ineligible to participate in federal healthcare programs; suspended or debarred from federal government contracts; or has been convicted of a criminal offense related to the provision of healthcare items or services and has not been reinstated in a federal healthcare program after a period of exclusion, suspension, debarment, or ineligibility, provided that we are aware of such a criminal offense.

Each month, the federal government publishes a list of individuals and businesses that are not allowed to receive government payment, which includes Medicare and Medicaid, for services provided. At least twice a year, all Orlando Regional team members, physicians, allied health professionals, board members, and vendors are searched against these lists to ensure we are not employing or doing business with excluded persons.

Investigations and Requests for Information

We must report violations of the Code of Conduct or any illegal activity. It is Orlando Regional’s policy to promptly and thoroughly investigate reports of illegal activity or violations of this Code of Conduct. We must cooperate with these investigations. We must not take any actions to prevent, hinder, or delay discovery and full investigation of illegal acts or violations of this Code of Conduct. It is a violation of this Code of Conduct to do so.

We shall cooperate fully and promptly with appropriate government investigations into possible civil and criminal violations of law. It is important, however, that in this process the organization is able to protect the legal rights of Orlando Regional and its team members. To accomplish these objectives, any governmental inquiries or requests for information, documents, or interviews should be promptly referred to the appropriate party as described in Orlando Regional policies and procedures. Any questions about investigations or requests for information should be referred to the Corporate Compliance Office.
Criminal Conduct

We do not permit or condone criminal activity with respect to any team member, business practice or service provided. If you become aware of possible criminal activity, you are required to report the circumstances using our Three Step Compliance Communication Process.

Any team member found to be involved in criminal conduct will be disciplined in accordance with corporate policy. Disciplinary action will be appropriate for the offense committed up to and including discharge.

We will refer all instances of suspected criminal conduct to the appropriate governmental authorities for possible criminal prosecution.

Emergency Medical Treatment and Active Labor Act

We comply with the Emergency Medical Treatment and Active Labor Act (EMTALA) in providing emergency medical treatment to patients regardless of ability to pay. Anyone with an emergency condition or requesting emergency services is given an appropriate medical screening examination and treatment based on the medical necessity. Financial and demographic information is obtained only after the patient’s medical needs are met. Ability to pay is not a factor in determining whether to admit or discharge patients.

Patients will only be transferred to another facility if the patients’ medical needs cannot be met at Orlando Regional and appropriate care is known to be available at another facility. Patients may only be transferred after they have been stabilized and are formally accepted by the alternate facility. EMTALA procedures must be followed.
Orlando Regional is dedicated to providing high quality, skilled care in a courteous and professional environment. We are committed to fostering an atmosphere that promotes integrity, honesty and mutual respect.

Open and Honest Communication
We encourage and foster a workplace where you are free to discuss any concerns you may have. An effective open communication process is the key to ensuring compliance with federal and state laws, rules and regulations as well as maintaining the exceptional quality of the services we provide.

Dignity and Respect in the Workplace
We must conduct ourselves in a professional manner. We treat everyone with kindness, courtesy, dignity and respect at all times. We are responsible for respecting the rights of those we interact with and reporting questionable behavior. If you become aware of any situation that could jeopardize the integrity of our organization, it is your responsibility to report it. If you are aware of a possible violation of the Code of Conduct please use the Three Step Compliance Communication Process.

No Retaliation
The Code of Conduct is available to assist us by defining conduct expectations in a number of key areas and by setting standards of behavior. All good faith reports under the Code of Conduct will be resolved in a discrete and professional manner. Orlando Regional will not tolerate any type of retaliation from anyone. If you feel you have suffered retaliation for reporting your concerns, please contact Human Resources or make use of the Three Step Compliance Communication Process.

integrity [in-teg-rEE-tee] n.
Adherence to moral and ethical principles; soundness of moral character; honesty.
CONFIDENTIALITY

Orlando Regional maintains the privacy and confidentiality of all information, regardless of medium, entrusted to our care. We are committed to following all federal and state privacy laws and regulations.

Patient Information

We do not share confidential patient information with anyone who does not have a legal need to know. Original copies of medical records should never leave the facility unless authorized by hospital administration. We will safeguard patient information from physical harm and protect the privacy of our patients’ health records according to federal, state and accreditation requirements.

We will not discuss patient information in any public area, including elevators, hallways, stairwells, restrooms, lobbies and dining areas.

We will safeguard confidential, sensitive and proprietary information in a manner designed to prevent the unauthorized disclosure of information.

Information Security

Information security refers to safeguarding confidential information from damage, loss, unauthorized access or unauthorized modification. All types of information, including but not limited to patient data, payroll records, personnel files, passwords and access codes will be maintained and respected to prevent unauthorized disclosure.

We maintain and monitor security systems, data back up systems and storage capabilities to ensure that information is maintained safely in accordance with our policies and procedures and federal, state and local laws.

Only Orlando Regional licensed software may be installed and operated on organizational equipment. We will not download any software from the internet or install personally acquired software.

We must also remember that use of the internet, including electronic mail (e-mail), is subject to review and monitoring by Orlando Regional at any time without notice. We should have no expectations of privacy regarding our internet or e-mail use.

Proprietary Information

We safeguard information technology and proprietary electronic information and protect it from improper use and access.

We guard our assets and the assets of others entrusted to Orlando Regional, including physical and intellectual property, and protect information against loss, theft or misuse.

We use Orlando Regional property appropriately, with approval and take measures to prevent any unexpected loss of equipment, supplies, materials or services and adhere to established policies regarding approval for disposing of Orlando Regional assets and data.

Personnel Actions and Decisions

Orlando Regional treats team member salary, benefit, disciplinary records, and other personal information as confidential. Team members must exercise care to protect unnecessary disclosure of this information.
Media Relations
All requests from the media for interviews with employees, medical staff members or employees of contracted services are coordinated through the Department of Media Relations to protect the patient’s right to security, personal privacy, and confidentiality of information.

All inquiries including requests for information about a patient’s condition from the news media must be referred to the Department of Media Relations. There is an on-call Media Relations representative available 24 hours a day, 7 days a week at 321 841-7830.

RECORD KEEPING

Documentation
Orlando Regional produces a large number of records and documents each and every day. Examples include medical records, financial records, e-mails, presentations, X-rays, and lab results. The following rules apply to all types of documentation:

• we do not falsify facts or make false records
• we do not sign someone else’s name to any document
• we do not document as someone else
• we create only records that are necessary and required
• we give records and information to people who have a legal “need to know”
• we always preserve patient confidentiality

Record Retention and Destruction
Orlando Regional has established policies and procedures regarding the storage and destruction of records. All records are kept for the legally required timeframe. Once that time is complete, it is important to destroy the records in a timely and appropriate manner. For more details regarding the retention periods and destroying old records, consult the policy on Records Management: Use/Retention/Destruction.

Any records that you wish to dispose of that may contain patient, financial, or other confidential information regarding Orlando Regional must be discarded in a shred bin. Under no circumstances should these documents be thrown in the trash.

Search Warrants and Subpoenas
If you or someone in your department is approached with a search warrant or subpoena, it is appropriate to contact Risk Management immediately at 321 841-5294. Risk Management will be able to advise you on proper procedures and help ensure that all rules and regulations are followed in executing a search warrant or subpoena. For additional information, consult the policy and procedure on subpoenas, search warrant, and government inspection or investigation.
CONFLICT OF INTEREST

All team members with management responsibilities, including directors, administrators, officers, managers, medical staff members with administrative duties, or other persons with substantial influence over the affairs of Orlando Regional have a duty to disclose any possible conflict of interest. All potential conflicts (including family members) will be reviewed by the Corporate Compliance Officer.

Outside Financial Interests

All persons noted above must disclose any situations where they or a member of the person’s family has a direct or indirect ownership, investment interest, or compensation agreement with any person or vendor with which Orlando Regional also has a business relationship.

Services for Competitors and Vendors

All persons noted above may not be employed by, act as a consultant to, or have an independent business relationship with any of Orlando Regional service providers, competitors, or third party payors outside the normal course of employment with Orlando Regional, unless prior approval is obtained from the Corporate Compliance Officer.

Participation on Boards of Directors and Trustees

Team members must acquire approval from the Corporate Compliance Officer prior to serving as a member of the Board of Directors or Trustees of any organization whose interest may conflict with those of Orlando Regional. Approval is not required for team members serving on the Board of Directors or Trustees of an organization with interests that will not conflict with those of Orlando Regional.

All potential or actual conflicts regarding membership on any Board of Directors or Trustees must be disclosed on the annual Conflict of Interest Questionnaire, if required.

Any questions regarding membership on any Board of Directors or Trustees and conflicts should be discussed with the Corporate Compliance Office.
BUSINESS RELATIONSHIPS

We will not offer or solicit gifts and favors or other improper inducements with whom the organization does or proposes to do business. Information about Orlando Regional business activities such as strategy, prices, costs, finances and similar matters are private. You may not enter into any agreement that is a refusal to deal with another organization or could impair the business of Orlando Regional or the other organization.

Gifts and Gratuities

A gift is defined as any gratuity, favor, discount, hospitality, loan, forbearance, or other item having economic value. For purposes of the Code of Conduct, “gift” shall include meals and entertainment.

Corporate policy states we may not give or receive any gift which may improperly influence relationships or business outcomes or give the appearance thereof. Gifts must never be given to or received from a referral source with the intent of inducing referrals or in a manner that could give the appearance of intending to induce referrals. A referral source is defined as an entity or individual that does or might direct patients or other medically related business activities to Orlando Regional. Further, we should not receive gifts from our patients.

We do not accept gifts at any time when we are in active negotiations or in a Request for Proposal (RFP) process with a potential vendor.

When we receive a gift that is not allowed by policy, the gift should be graciously returned to the donor and reported to the Corporate Compliance Office. If the donor insists on giving a gift, it is acceptable to suggest a donation to the Orlando Regional Healthcare Foundation. Should the donor agree to do this, we must contact the Foundation for guidance and processing. If the donor refuses to take the gift back, we must contact the Corporate Compliance Office or the Foundation immediately for further direction.

At the discretion of department management, there are gifts that are permissible so long as they do not improperly influence a relationship or decision or involve referral sources. Gifts may be given or received when they are of such nominal value that they could not reasonably be perceived by anyone as an attempt to affect the judgment of the recipient. Items of nominal value include promotional items bearing the vendor’s name (e.g., key chains, pens, note pads), as well as small amounts of food for departmental meetings. The value of the gift should not exceed $5-$10 for each item. Orlando Regional further recognizes that legitimate business dealings may include a shared meal or other similar social occasion, which may be proper business expenses and activities. More extensive entertainment, however, only rarely will be consistent with policy and should be reviewed and approved in advance by the Corporate Compliance Officer. Whenever you are unsure whether a gift or event is acceptable, it must be reported to your immediate supervisor and the Corporate Compliance Office for guidance.

You can contact the Corporate Compliance Office or The Foundation with questions regarding gifts.
Vendor Relationships

All business dealings on behalf of Orlando Regional must be the result of usual and proper business considerations. Anyone working on our behalf must agree to abide by our values and principles. We choose vendors using objective measurements. We give all vendors who meet these standards an equal chance to present their products and services. We do not give or receive any form of payment, kickback or bribe to induce the referral or the purchase of any service. We choose the product or service that best meets the needs of Orlando Regional.

Business Inducements

Team members may not attempt to gain any advantage or encourage favors with improper payments, business courtesies or other inducements. We do not offer any improper inducements or favors to patients, providers or others to encourage the referral of patients to our facilities or to use a particular product or service. Orlando Regional team members may not solicit gifts or favors in exchange for influence or assistance in a transaction when conducting business with a vendor. If any Orlando Regional team member has any doubt or concern about whether specific conduct or activities are ethical or otherwise appropriate, such person should contact the Compliance Office.

Contracting

All contracts and contract talks must be consistent with the law and, when required, must be reviewed and approved by the Corporate Compliance Officer or the appropriate corporate representative. Contracts identified with potential conflict of interests will be subject to review by the Corporate Compliance Officer.

All business relations with contractors must be conducted in compliance with Orlando Regional policies and procedures. Team members have a responsibility to obtain clarification from the Corporate Compliance Officer on any questionable issues that arise.

We must consider our Conflict of Interest policy before entering into any contractual relationship. Contracts must be in writing and signed by either the Director of Materials Management or the responsible Vice President or President of Orlando Regional.

Workshops, Seminars and Training Sessions

Orlando Regional encourages its team members to pursue career development through attendance at approved job related seminars, conferences, or workshops. Team members’ attendance at approved job-related seminars, conferences or workshops shall be determined by the department manager based on mutual benefit to the team member and to Orlando Regional.

Management or the Corporate Compliance Officer’s approval is required before accepting an offer to attend vendor promotional training at the vendor’s expense for reimbursement or pre-payment for seminars, conferences and workshops. Team members must also follow the normal approval process governing the travel booking procedures and travel expense policies.
PROTECTION OF ASSETS

Financial Reporting

Financial statements serve as a basis for managing business and are important in meeting obligations to, among others, patients, team members, suppliers and creditors. Accurate financial statements are essential in complying with tax and financial reporting requirements. We use generally accepted accounting principles to maintain and report accurate financial statements. We maintain a financial reporting system that provides timely, accurate, and comprehensive disclosure concerning our financial and business condition. We do not create false or misleading entries in any financial record. We record all transactions, payments and receipts timely, accurately and in a consistent manner.

We promptly report concerns involving accounting, financial reporting, use of assets, internal controls or auditing matters to the Corporate Compliance Officer. Corrupt alteration, destruction or concealment of records, documents or other objects with the purpose of impairing the integrity or availability of such documents or objects in relation to any type of federal investigation or official proceeding is strictly prohibited.

Any officer, director or affiliated person of Orlando Regional cannot take any action to fraudulently influence, coerce, manipulate, or mislead any auditor engaged in an audit for the purpose of misrepresenting the organization’s financial condition.

Use of Company Assets

Company assets include, but are not limited to, equipment, inventory, supplies, funds, software, employee time, business strategies and data (financial, patient or otherwise). Company assets should be used for purposes directly related to Orlando Regional business, any other use should be approved in advance. Company assets should be handled with the utmost care and respect. We are responsible for reporting and guarding against loss, misuse, waste and/or abuse of company assets.

Travel and Entertainment

Orlando Regional pays travel and entertainment expenses in accordance with corporate policy. Travel and entertainment expenses should only be incurred to support the interest of the organization and should be consistent with job responsibility. We are expected to exercise reasonable judgment when using company resources to fund travel and entertainment.

Internal Control

Internal control is a process designed to provide reasonable assurance regarding the achievement of objectives. Orlando Regional has implemented a system of internal controls to ensure effective and efficient operations, reliable financial reporting, and compliance with laws and regulations. We make no attempt to circumvent the system of internal controls. We are responsible for reporting known control violations or weaknesses using the Three Step Compliance Communication Process. We promptly report information involving deficiencies in the design or operation of internal controls that could adversely impact our ability to record, process, and report financial data.

The effectiveness of the internal control system is reviewed regularly by Finance and Internal Audit. Internal Audit is responsible for monitoring compliance with laws, regulations, policies and procedures across the organization. Full cooperation should be provided to any internal or external auditor. No attempts should be made to obstruct or mislead an auditor.
What happens to any good faith report, complaint or inquiry once it is reported?

All reports, complaints, and inquiries will be investigated or researched by the appropriate area, usually either Human Resources or Corporate Compliance. If you use the Compliance Hotline, you will be given an identification number by the customer service representative that will allow you to follow-up on your Hotline call. You do not have to give your name, and calls are not recorded. Remember to include enough information, such as names and locations, and a detailed description of your concern when making your report so we may accurately investigate your matter. Orlando Regional does not condone retaliation against any team member that has given a good faith report or complaint.

While negotiating a contract with a vendor, the vendor suggested closing the deal with an all expense paid three day cruise for me and my spouse. Can I accept such gift?

No, you may not. Corporate policy states team members may not give or receive any gift which may improperly influence relationships or business outcomes or give the appearance thereof. Gifts must never be given to or received from a referral source with the intent of inducing referrals or in a manner that could give the appearance of intending to induce referrals. A referral source is defined as an entity or individual that does or might direct patients or other medically related business activities to Orlando Regional. If you have any questions regarding gifts or vendor relations, please don’t hesitate to contact the Corporate Compliance Office.

My supervisor insists on giving me a hug every morning as I come in to work. Who can I talk to about this uncomfortable behavior?

You should immediately report your concern to any Employee Relations Manager or another member of the Human Resources Management Team. Employee relations will conduct a thorough review involving all appropriate parties. You may also contact the Compliance Hotline and your matter will be forwarded to the Human Resources Department for investigation.

The office computer software is a newer version of what I have at home. Can I copy this file and install it on my home computer?

Due to copyright laws it is unlawful for any unauthorized duplication of software or applications. You may not copy any software or applications used by Orlando Regional to your home computer. You also may not bring in software from your home or downloaded from the internet and install it on your computer at work.

I am preparing a training session and would like to use an article from a nursing journal. Can I make copies of the article to distribute to the trainees?

It is the policy of Orlando Regional to comply with the copyright laws of the United States. Administrative Policy 5706-0313 Copyright addresses the procedures and resources available to help you be copyright compliant. You must determine if the document you would like to internally distribute is included on the Copyright Clearance Center approved copying list. Generally, copyright laws prohibit anyone from reproducing any copyrighted work, whether in print, video, electronic, or any other form. Copyright laws also protect works even if they are not registered with the U.S. Copyright Office and do not carry the copyright symbol. You must follow the procedures outlined in the policy.
I am reviewing completed medical records in preparation for an accreditation visit. Some of the medical records are missing signatures and other documentation. Can I add the missing signatures and documentation?

If you fill in the missing signatures and insert missing documentation on behalf of someone else, you are in violation of the Code of Conduct and specific policies. The medical record is a legal document and you may not sign or add documentation for another person.

Our laboratory department received a phone call from a person identifying himself as a Medicare Investigator and is asking questions. Do I answer his questions?

You should never answer any questions or release patient or confidential information without verifying who the caller is. The first step is to ask the caller for their name, title, agency or organization, and telephone number. Tell the caller that policy requires you to contact the Risk Management Department and that you cannot answer any questions without verifying their identity. Next, notify Risk Management and Corporate Compliance with the caller’s contact information so we may coordinate the proper response.

Can I discuss my salary with others in my department?

In addition to patient information, all business information such as payroll records (including salary or pay rates), financial records, personnel files, passwords, and access codes must be kept confidential at all times, and should never be discussed or shared with someone that doesn’t have a legitimate need to know.

What is the difference between the Compliance Hotline and the We’re Listening line?

The Compliance Hotline is a toll-free, 24 hour a day hotline service operated by an independent company, used to report any issues or concerns involving fraud and abuse, conflicts of interest, confidentiality, bribes and kickbacks, or any other compliance matters. You do not have to give your name, and the calls are not recorded.

The We’re Listening line is used to voice any HR related questions, concerns, or comments and is operated by Human Resources. Issues reported to either line will be forwarded to the appropriate department for follow-up and investigation if necessary.

A patient has recently stated to me that they really appreciate everything I have done for them as their nurse and want to compensate me for all I have done. How should I handle this?

We are not allowed to receive monetary gifts of any kind. A suggestion would be to thank the patient for their kindness, inform them of our policy on gifts, and suggest a donation to the Foundation.

I have a second job and over the holidays, I am required to work certain shifts in order to keep my job. How do I get my schedule changed to accommodate this need?

According to our Moonlighting and Dual Employment policy, we should not engage in outside work that conflicts with scheduled hours, overtime hours when required or of the proper performance of Orlando Regional assignments or the meeting of established deadlines.
ACKNOWLEDGEMENT OF RECEIPT AND UNDERSTANDING OF THE ORLANDO REGIONAL HEALTHCARE CODE OF CONDUCT

This is to acknowledge that I have received, reviewed and understand Orlando Regional Healthcare’s Code of Conduct. I agree to comply with the standards contained in the Code of Conduct and all related policies and procedures as is expected as part of my continued employment or association with the organization.

I acknowledge that the Code of Conduct is only a statement of principles for individual and business conduct, and does not constitute an employment contract. I will report any potential violation of which I become aware promptly to my supervisor or the Corporate Compliance Officer.

I understand that any violation of the Code of Conduct or any corporate policy or procedure is grounds for disciplinary action, up to and including discharge from employment.

SIGNATURE ____________________________________________ TITLE __________________________________________

NAME __________________________________________________ DATE __________________________________________

(please print)

EMPLOYEE ID ____________________________________________