



**Star Community Health, Inc.
Compliance Program**

CODE OF CONDUCT

An Ethical, Honest Workplace Begins with You!

Revised: March 2021



The mission of Star Community Health, Inc. (“Star Community Health”) is to provide compassionate, excellent quality and cost-effective health care to the residents of the communities we serve regardless of their ability to pay for health care.

Star Community Health Code of Conduct

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I. Introduction to the Standards

The mission of Star Community Health, Inc. (“Star Community Health”) is to provide compassionate care. We provide quality and cost-effective health care to the residents of the communities we serve. We provide this care regardless of their ability to pay. Our mission is focused on one individual: **the patient**.

- We conduct ourselves in an ethical manner. We follow the law.
- We show respect for ourselves and others.
- This behavior is in keeping with our values of **PCRAFT- PRIDE, CARING, RESPECT, ACCOUNTABILITY, FLEXIBILITY AND TEAMWORK**.

The Code of Conduct (“The Code”) summarizes the behavior expected by everyone. This includes directors, managers, team members, medical staff, volunteers, vendors, and contractors. No one is exempt from “The Code”.

“The Code” does not replace your sense of fairness, honesty and decency. It gives you direction when you face a situation that “just doesn’t feel right”. If this happens, speak with your supervisor. If you are not comfortable talking to your supervisor, you can speak with Human Resources or the Director of Compliance at 484-822-7822. You can also use the confidential **Hotline at 1-844-711-0265 or online at [starcommunityhealth.ethicspoint.com](https://www.starcommunityhealth.ethicspoint.com)**.

This link is also available on the Star Community Health’s Compliance webpage at: <https://www.starcommunityhealth.org/compliance>.

- Star Community Health will do everything possible to protect your confidentiality.
- Star Community Health prohibits retaliation against any employee who raises a concern or asks a question in good faith.

“The Code” covers a wide range of situations that you might encounter. Please read it carefully and keep it on hand when you have questions. You must sign a statement that you have received and will read “The Code”. Make sure you understand it and are willing to comply with all policies. If you have any questions, please contact your supervisor, Human Resources or the Director of Compliance at 484-822-7822. You may also call the confidential **Hotline at 1-844-711-0265 or go online at [starcommunityhealth.ethicspoint.com](https://www.starcommunityhealth.ethicspoint.com)**.

“The Code” is also available on the Star Community Health’s Compliance webpage at: <https://www.starcommunityhealth.org/compliance>.

II. Patient Confidentiality and Relations

Confidentiality of Patient Information:

- Unless you have a reason to open and read medical records, **don't do it!!!**
- Unnecessary use and disclosure of patient information is against the law. It can lead to corrective action, up to and including termination.
- Do not discuss patient information in public. Examples of these areas are corridors, elevators, cafeterias, and bathrooms.

Patient Safety: Star Community Health is committed to providing a safe environment for our patients and employees. You are responsible for reporting any concern, large or small. **The electronic “Patient Safety Event Reporting System” is a system available for reporting concerns.** It is accessible to all staff at www.starcommunityhealth.org (Employees Tab).

Patient Rights:

- Our patients have the right to quality care without regard to payment, race, color, religion, ancestry, or sex. Patients also have a right to quality care without regard to gender identity, nationality, sexual orientation, disability, age, genetic information or other characteristics defined by the law.
- We respect the right of a patient to make informed decisions about his or her health care. Each patient or their representative is provided information regarding care. This information includes diagnosis, treatment plan, and the right to refuse or accept treatment. Star Community Health also provides information about advance directives and an explanation of the risks, benefits, and alternatives associated with the treatment plan.

Grievances:

- We respect the patient's opinion and provide a process for filing a grievance.
- See the Complaint and Grievance Policy located on www.starcommunityhealth.org (Employees Tab).

III. Workplace Conduct

Harassment, Disruptive Behavior and Discrimination: Star Community Health does not condone or tolerate discrimination or harassment of any kind.

- Employment is based on merit and experience. It is not affected by race, color, religion, ancestry, age, sex, nationality, sexual orientation, gender identity, disability, or genetic information.
- Sexual harassment is prohibited. Sexual harassment includes unwelcomed sexual advances or requests for sexual favors that affect employment. Sexual harassment includes, but is not limited to offensive comments, jokes, indirect suggestions and other sexually suggestive statements.
- Harassment also includes threats or actual verbal and physical assaults, robbery, stalking and crimes directed against an individual.
- Star Community Health has “zero tolerance” for disruptive behavior, or for retaliation against an accuser or witness to any alleged disruptive behavior.

Weapons on Star Community Health’s Property:

- Firearms, other weapons, explosive devices or other dangerous materials are not allowed on Star Community Health’s property.

Report any incident of discrimination, harassment or disruptive behavior to a supervisor, manager, or Human Resources right away. Star Community Health will investigate all claims. If the claim is supported, Star Community Health will take action to end the harassment. Reports of harassment will be kept confidential unless disclosure is necessary for the purpose of investigation or corrective action.

Workplace Health and Safety: Maintaining a healthy and safe workplace for patients, visitors, and members of the Star Community Health public is the responsibility of everyone.

- You should become familiar with how the safety rules apply to your specific job. Ask your supervisor when you have questions.
- You **must notify** your supervisor about safety hazards, broken equipment, a workplace injury or any situation presenting a danger of injury.

Smoke-Free Environment: Star Community Health is committed to the promotion of health, which includes the prevention of disease as well as its treatment.

- Smoking by employees is not permitted in or on any of the grounds of the Centers owned or leased facilities.
- Smoking on adjacent properties and sidewalks creates a negative reflection on the image of Star Community Health and is also prohibited.

Drugs, Alcohol Free Environment: Star Community Health is committed to improving the health of our patients and team members.

- Star Community Health does not allow the use of unprescribed controlled substances by any employee, whether the unlawful drug activity occurs inside or outside the workplace.
- Off-the-job conduct involving alcohol and/or drugs can result in corrective action up to and including termination.
- Actions that negatively affect the employee's job performance or jeopardizes his or her safety or the safety of others will result in corrective action, up to and including termination.
- Conduct that negatively affects the public trust in the ability of Star Community Health to carry out its responsibilities can result in corrective action, up to and including termination.
- Any employee on the job or on Star Community Health premises who is involved in unauthorized possession or use of drugs and/or alcohol or is suspected of being under the influence will be suspended from work immediately. He or she will be taken for fitness for duty exam and subject to corrective action, up to and including termination.

Licenses and Certificates: Team members, medical staff and independent contractors requiring licenses, certificates and other credentials to perform their jobs are responsible for maintaining the current status of their credentials.

- They shall comply with all federal and state requirements related to their discipline.
- The requirements to participate as a member of the medical staff can be found in his/her Medical Staff Membership section of the Medical Staff Bylaws.

Use of Star Community Health Property and Equipment: Each of us has a responsibility to protect and preserve the assets of Star Community Health. This includes employee time, Network equipment, supplies, facilities, computer hardware and software, and information.

- You may not use or take any Star Community Health assets without prior permission of your supervisor.
- Personal telephone calls should be limited to emergencies during working hours.
- Telephone and Internet access at work are not to be used to post, distribute, transmit, store or download any material that is obscene, threatening, discriminatory, or maliciously false.
- Abuse, misuse or deliberate destruction of Star Community Health's property or equipment may result in corrective action, up to and including termination.

IV. Legal Compliance

Star Community Health is a complex organization whose conduct is regulated by federal, state and local laws. It is the policy of Star Community Health to comply fully with the letter and spirit of these laws.

Legal and Regulatory Compliance (Fraud and Abuse):

- Your responsibility is to understand how your job impacts the environment. You must adhere to the policies and procedures for waste management and immediately report to your supervisor any situations involving discharge of a hazardous substance, improper disposal of hazardous material, and medical waste or potential damage to the environment.

Retention and Disposal of Records: A health center as large as Star Community Health creates many different types of records.

- We do not falsify facts or make false records.
- We create only those records that are necessary and required by law.
- We give records only to people who have a need to know and only to the extent necessary for them to perform their responsibilities.
- We retain records consistent with legal requirements.
- We dispose of records in accordance with Star Community Health policies and procedures.
- **All records containing sensitive information such as patient medical records, personnel files, and financial and business records are disposed of in a manner to ensure confidentiality.**
- Records must never be altered, falsified, or destroyed in an effort to deny governmental authorities' access to records that may be relevant to a government investigation.
- Under no circumstance may a director, manager, team member, member of the medical staff, volunteer, or contractor use information found in patient, personnel, or business records to personally benefit or engage in identity theft.

You must also know and follow the records retention and disposal policies and practices for your specific job. **If you are not certain whether a record should be retained or disposed of, ask your supervisor or contact the Director of Compliance at 484-822-7822.**

V. Business and Financial Practices

Accurate Coding and Billing: Star Community Health bills the government, third party payers, and patients for services and items that were provided. These services must be ordered by appropriate medical personnel and they must be medically necessary. The need for medical care must be documented in the medical record.

- Star Community Health prohibits any team member or agent from knowingly creating or submitting claims for payment or approval that are false, fictitious, or fraudulent.
- Star Community Health monitors coding of claims for accuracy and makes immediate corrective action when errors are discovered.
- Star Community Health does not excuse or accept falsifying information or documents. This includes making alterations that do not have a legitimate business purpose.
- It is your responsibility to ensure the accuracy and integrity of the documents and records you prepare.

If you think that claims are incorrect and have been billed, you must report it to the Director of Compliance at 484-822-7822 or call the Compliance Hotline at 1-844-711-0265 or online at [starcommunityhealth.ethicspoint.com](https://www.starcommunityhealth.ethicspoint.com).

This link is also available on the Star Community Health's Compliance webpage at: <https://www.starcommunityhealth.org/compliance>.

Star Community Health does not allow retaliation against any employee who reports a valid concern. Individuals, who violate the retaliation policy, will receive corrective action according to company policy.

Whistleblower Policy: Employees are also required to report any gross mismanagement of a Federal contract or grant or gross waste of Federal funds. In addition, employees are required to report reasonable suspicions of any action by Star Community Health, or a Star Community Health employee, which may **present substantial and specific danger to public health or safety**, or that is a violation of any law related to a Federal or State funded health care program.

Any employee who reports such information will have the right and opportunity to do so anonymously and will be protected against retaliation for coming forward with such information both under our internal compliance policies and procedures and Federal and State law.

Any employee who believes that he or she has been subjected to inappropriate retaliation by Star Community Health for reporting legitimate suspicions of non-compliant behavior may submit a complaint to the Inspector General of the executive agency involved and have all rights and remedies afforded to them through the judicial process as designated by Federal law. However, Star Community Health retains the right to take appropriate action against an employee who has participated in a violation of Federal or State law or internal policy or intentionally and maliciously makes a false report.

Summary of the Law: This statute applies to all employees working for contractors, grantees, subcontractors and sub-grantees of Federal contracts and grants.

It provides protections for employees who disclose information that the employee reasonably believes is evidence of gross mismanagement of a Federal contract or grant, a gross waste of Federal funds, an abuse of authority relating to a Federal contract or grant, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulations related to a Federal contract or grant.

The statute provides that employees who make such disclosures may not be discharged, demoted, or otherwise discriminated against if the disclosure is made to one of the following:

- A member of Congress or a representative of a committee of Congress
- An Inspector General
- The Government Accountability Office
- A Federal employee responsible for contract or grant oversight or management at the relevant agency
- An authorized official of the Department of Justice or other law enforcement agency
- A court or grand jury
- A management official or other employee of the contractor, subcontractor, or grantee who has responsibility to investigate, discover, or address misconduct.

Any employee who believes he or she has been subjected to retaliation as stated above may submit a complaint to the Inspector General of the governmental agency involved. The employee will have all rights and remedies afforded by Federal law.

Confidentiality of Personnel and Proprietary Information:

- Salary, benefit, and personal information about a team member is confidential. This information may only be accessed for business reasons.
- Confidential information covers many areas of Star Community Health operations. It includes many subjects. Some of these subjects are patient lists and clinical data. Also included in this list is information pertaining to acquisitions, financial data, marketing strategies. Any proprietary computer software, purchasing contracts, and supplier and sub-contractor information is also confidential.
- We must always be aware of our surroundings when accessing confidential information. This is true especially with patient information. We are obligated to prevent unintended disclosure.
- You must avoid sending sensitive information outside Star Community Health through the Internet or storing information on laptops or flash drives. This should not be done unless the information is encrypted and you can reasonably make sure that the storage devices will not be stolen, lost, or misplaced.
- You must safeguard your password to information systems and not share it with anyone.

It is essential that each person with access to Star Community Health information systems comply with all information security policies and procedures. It is our responsibility to maintain the confidentiality and integrity of information.

We must make sure that we do not disclose it to others unless the individuals have a need to know the information in order to perform their specific job duties or carry out a contractual business relationship.

VI. Personal and Business Relationships

Conflicts of Interests: A conflict of interest arises when your personal interests are different from the best interests of Star Community Health.

- A conflict of interest may happen if an interest of a team member, member of the medical staff, manager or director influences or appears to influence work related decisions.
- Individuals affiliated with Star Community Health may not use their position to profit personally. They may not assist others to profit at the expense of Star Community Health. As such, each owes a duty of undivided loyalty to Star Community Health. A conflict of interest may also result from outside activities if these activities hinder or distract an individual from job duties.
- It is your responsibility to make sure that your personal interests and outside activities do not lead to a perceived conflict of interest.
- You must also disclose conflicts of interests to your immediate supervisor, who will report this to the Director of Compliance. Your supervisor and the Director of Compliance will determine if there is a conflict of interest.

Gifts: It is the policy of Star Community Health to avoid team members giving, soliciting, or receiving gifts, favors or hospitality.

- These gifts include meals and entertainment that would influence or appear to influence decision making or actions affecting Star Community Health.
- Team members are prohibited from giving and receiving gifts of cash or its equivalents, including gift certificates, gift cards, stocks, and coupons.
- Team members may accept gifts with a face value of no more than \$100.00 per calendar year.
- Meals and entertainment with a value of \$100.00 may be accepted provided the Star Community Health team member and outside business associate are present and business is discussed.

Relationships with vendors, suppliers, consultants and contractors: It is the intent of Star Community Health to create a level playing field when dealing with vendors, suppliers, consultants and contractors.

- We manage our purchasing relationships in a fair and reasonable manner. It is free from conflicts and consistent with applicable laws and good business practices.
- We select vendors using objective measurements. These may include quality, technical excellence, price and ability to meet delivery schedules. We do not make decisions based on personal relationships.
- We do not solicit or accept inducements to steer business to specific vendors.
- We do not accept kickbacks from vendors for selecting them for Star Community Health business.
- We do not rig bids to favor a specific supplier or disclose confidential information from a vendor to competitors unless required by law and authorized by the vendor and law.
- We do not knowingly do business with any contractor or supplier who has been barred or excluded from federal programs.

Engaging in these practices and others deemed to be contrary to fair business practices will result in disciplinary action, including termination of employment.

Relationships with Competitors: Star Community Health is bound by highly complex antitrust laws which govern our relationships with competitors. These laws are designed to promote fair competition. Antitrust laws could be violated by discussing with a competitor our business matters.

- Included is the process for setting charges or marketing plans. Antitrust laws could also be violated by agreeing to allocate services or procedures in a particular geographical area or agreeing with a competitor to not deal with a particular vendor or payer.
- You should avoid any discussion of these matters with competitor's personnel in private discussions and public forums such as a professional meeting.
- You should also inform in writing the Legal Services Department of the incident.

Relationships with Research Subjects: We are committed without question to the safety and rights of the individuals who have chosen to participate in clinical research.

- Star Community Health adheres to ethical standards and complies with all laws and regulations in any research.
- We also adhere to ethical standards and comply with laws related to clinical and investigational trials conducted by our physicians and professional staff.
- Star Community Health will not tolerate any research misconduct. Misconduct includes coercing patients, plagiarism or taking credit for another's work or falsifying research results.

Relationships with Government and Public Officials: The federal and state government has strict rules regarding the giving of gifts, meals and other business courtesies to their employees.

- It is the policy of Star Community Health to not offer or give anything of monetary value.
- The list includes gifts, gratuities, favors, entertainment. We refrain from offering these items to any elected official, employee, and representative of a government agency that Star Community Health has a business relationship with.
- We also refrain from offering these items to any agency that regulates any Star Community Health operations or activities.
- We may provide minor refreshments, such as a cup of coffee, during the course of business discussions. We will only do this if allowed by law and the regulations of the governmental agency.

VII: Star Community Health Compliance Program

The mission of the Star Community Health Compliance Program is to ensure that Star Community Health team members “do the right thing”. Some may ask, what is the “right thing”?

- It is working together every day, respectfully and diligently, to provide comfort, compassion, guidance, and expertise to those we serve.
- It is recognizing that we have a duty to act as responsible stewards of resources entrusted to our care.
- It is conducting our personal and business affairs in a lawful manner.
- It is being a good corporate and private citizen.

The structure of the Star Community Health Compliance Program is designed to ensure a continual compliance presence throughout the organization.

- The Board of Directors provides guidance, direction and oversight to the Compliance Program.
- The Director of Compliance is responsible for the day-to-day operation of the Program.
- The Director of Compliance also maintains the Compliance Hotline and directs responses to team members’ inquiries and messages.
- The Director of Compliance coordinates and conducts investigations to resolve compliance issues. This department performs reviews and audits of Star Community Health operations to assess compliance with policies and federal and state requirements.
- Star Community Health executive leadership has working knowledge of relevant issues, laws and regulations relating to compliance, and conducts compliance training.

Each person affiliated with Star Community Health has an individual responsibility to report any activity that appears to violate applicable laws, rules, regulations the Star Community Health Code of Conduct, and Star Community Health policies

- to your supervisor
- to the Director of Compliance at the following number: 484-822-7822 or
- via the **Compliance Hotline at 1-844-711-0265** or
- to the confidential website [starcommunityhealth.ethicspoint.com](https://www.starcommunityhealth.ethicspoint.com) located on the Star Community Health website: <https://www.starcommunityhealth.org/compliance>

Star Community Health will make every effort to maintain your confidentiality within the limits of the law.

- **You will not be subjected to retaliation or discipline for reporting a violation made in good faith.**
- You will be disciplined for deliberately making a false accusation for the purpose of harming or retaliating against another team member.
- You are encouraged to report matters that pertain to employment to your supervisor and Human Resources.
- Star Community Health is committed to investigating all reported concerns. The Director of Compliance will coordinate all findings and recommend corrective action or needed changes.
- All persons affiliated with Star Community Health, including members of management, shall cooperate fully with investigations.

When an investigation determines that a violation of the law, Star Community Health policy or this Code of Conduct has occurred, Star Community Health shall implement immediate measures to correct the violation and prevent it from happening again.

Corrective measures may include:

- Education,
- Repayment
- Self-disclosures to federal and state officials
- Corrective action, including termination of employment

VIII: Conclusion

The Star Community Health Code of Conduct reflects who we are as members of this community and how we should conduct ourselves in our dealings with the individuals who seek our services.

The Star Community Health Code of Conduct explains how we deal with the governmental functions that regulate the provision of these services, and how we interact with outside parties whom we purchase resources from. Most importantly, it reflects how we deal with each other. We conduct ourselves in a lawful and ethical manner. After all, an ethical, honest workplace really does begin with you.

If you have any questions or comments regarding “The Code”, please contact the Director of Compliance at 484-822-7822 or call the toll-free, confidential Hotline at 1-844-711-0265, or by going on line to the confidential website, starcommunityhealth.ethicspoint.com located on the Star Community Health webpage: <https://www.starcommunityhealth.org/compliance>.